

Wine and Spirit Training is an Approved Provider of Wine and Spirit Education Trust courses - APP 1401

#### **BACCHUS ACADEMY PRIVACY POLICY**

Bacchus Academy is committed to protecting your privacy. We aim to respect all personal information you share with us, or that we receive from others, and keep it safe.

Bacchus Academy is an approved program provider for Wine Spirit Education Trust (WSET), French Wine Scholar (FWS) and Barossa Wine School (BWS).

If you enrol in a course with these programs, we will need to share some of your information with them in order to administer course materials and qualifications.

Therefore we encourage you to review the relevant partner's privacy policy as well:

- Click here to view WSET's privacy policy
- Click <u>here</u> to view BWS's privacy policy
- Click <u>here</u> to view WSG's privacy policy

#### Who we are and how to contact us:

If you have any questions about how we use your personal information or how we comply with our responsibilities, please contact us as follows:

Bacchus Enterprises Pty Ltd ABN 51 638 188 940 https://bacchus.academy jenny@bacchus.enterprises +61 414 812 811

## How we collect your personal information

We collect your personal information in a number of different ways, depending on how you engage with us. We have set out these methods below:

# When you directly provide it to us directly

For example, when you register for a course or event through the website or via personal conversation/email.



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When our systems collect information or personal information indirectly

For example, whenever you use a website or mobile application. The most common type of information our systems collect is in the form of cookies (cookies are small text files sent by your computer each time you visit our website) but can also include personal information transferred by the device you are using to access our website.

The manufacturer of your device or the provider will have the details about what information your device shares.

### Cookies on the Bacchus Academy website:

If you leave a comment on our site, you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

# What personal information we collect:

The type of information we collect depends upon your engagement with us. We may collect the following information about you:

- (a) Your name, date of birth, gender and contact details (this could include your postal address, telephone numbers and email address);
- (b) Purchases and orders made by you or on your behalf.
- (c) Your payment card details (which are encrypted) when you purchase any products or services
- (d) When you set up any account with us, your login credentials;
- (e) Your marketing preferences;
- (f) Your correspondence with us;
- (g) In certain situations, information relating to health which may be required to support applications for reasonable adjustment and/or special consideration in the context of exams for WSET qualifications:
- (h) Your ethnicity and/or racial origin and such other information as may be required by our regulator in connection with the delivery of WSET qualifications.

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# Why we collect your personal information

We use your personal information for a number of different reasons, as listed below:

- 1. To register you as a candidate with WSET and enable you to sit exams for WSET qualifications.
- 2. To administer and conduct your exam, including making arrangements for reasonable adjustments and/or special considerations.
- 3. To communicate with WSET and have your exam results and qualification certificate issued as appropriate.
- 4. To provide you with post-results services such as enquiries against results and appeals and solicit feedback from you on WSET qualifications.
- 5. To process your registration for any WSET-related courses or events so that we can deliver these services to you.
- 6. To send you information regarding the course or event for which you are registered (or which you have registered interest in).
- 7. To process sales of products or services you have purchased from us.
- 8. To manage any account(s) for providing our online services including but not restricted to our online courses. For example:
- (a) We can provide you with the relevant products and services;
- (b) You can access relevant course materials;
- (c) We can fulfil our services and communicate with you about them.
- (d) To verify your identity.
- (e) To carry out research to better understand your requirements on the relevant products and services.
- (g) To personalise, report on and improve the services and products we provide to you, and to provide you with a best-in-class customer service experience.
- (g) To send you marketing communications including information about our qualifications, upcoming events, etc.
- (h) To investigate any potential maladministration, malpractice, or other non-compliance in connection with the delivery of WSET qualifications.

# Lawful processing

We are required to rely on one or more lawful grounds to collect and use the personal information we have outlined above. We consider the grounds listed below to be relevant:



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### 1. Legitimate interests

Where applicable law allows us to collect and use personal information for our or another person's legitimate interests, and the use of your personal information is fair, balanced and does not unduly impact your rights. We rely on this ground to process your personal information when we believe that it is more practical or appropriate than asking for your consent.

For example, when we use your personal information to register you for and process your exams, that is a key component of our legitimate business interest in providing you with a WSET qualification.

Additionally, where you provide information on the Online Classroom and Global Campus, we will rely on the legitimate interest ground to communicate with you in most instances.

#### 2. Consent

Where we ask for your consent for our use of your personal information for a specific purpose. For example, we will ask for your consent to send you marketing materials via email. You always have the right to withdraw your consent.

#### 3. Contract

Where it is necessary to use your personal information to fulfil a contract with you or to take steps at your request prior to entering into one. For example, when you sign up for a qualification, you are asked to agree to our terms and conditions. This creates a contract between you and Bacchus Academy. It may be necessary to use your information to update you about course details, or other such administrative matters.

### 4. Special Categories of personal information

Data protection law recognises certain categories of personal information as sensitive and therefore requires more protection. These categories of data include information about health, ethnicity, and political opinions.

We may collect and/or use special categories of data in connection with the provision of our services, for example in order to make adjustments for any disabilities or dietary requirements you may have. We will only process these special categories of data if there is a valid reason for doing so and where the data protection laws allow us to do so.

5. Marketing communications - Opt-in and Opt-out In general, Bacchus Academy will not send you any marketing information unless you have requested to receive e-mail/text/social media message updates from us. However, if you have made a purchase from us in

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the past or contacted us in relation to one of our qualifications, we may contact you in the future about similar items or qualifications. We will always provide you with an opportunity to opt out of any further communication, as discussed below:

For legal entities, such as companies, limited liability partnerships and other incorporated organisations, Bacchus Academy operates, in compliance with the relevant data protection laws, an 'opt-out' policy. This means that we will continue to contact such businesses with news and information about our goods and services until we are informed that this communication is no longer required.

If you (whether an individual or a legal entity) wish to be removed from our direct marketing list and do not wish to receive any further information from us (opt-out) you can inform us of this by clicking on the link at the bottom of each email communication you receive from us, or by our Contact Us page.

## 6, Sharing your personal information with third parties

For us to provide you with products and services, we on occasion share some of your personal information with certain approved third parties. These include WSET, examiners, and teachers.

For WSET courses, information such as names, date of birth and email addresses will be shared between Bacchus Academy and WSET to facilitate ordering examinations and filing past exam grades.

Teachers will receive a class list including names, email and phone numbers so contact can be made with students directly if required.

# Data Retention - how long do we hold your personal information

We will not hold your personal information for longer than is necessary for the purposes described in this policy. If, however, you have completed one of our qualifications we will retain your information for a longer period.

# Your Rights

If you have an account on this site or have left comments, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

You have several rights under the data protection law these are summarised below.



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### 1. The right to be informed:

You have the right to total transparency on how we are using your personal information, we will endeavour to make this clear by ensuring that this document is regularly reviewed and updated, but if you have any concerns or questions, please send them to our data protection contact at jenny@bacchus.enterprises

### 2. Your right to access:

You have the right to know what information we hold about you and how it is processed. If you wish to access your personal information, contact jenny@bacchus.enterprises. If we are satisfied that you have a right to see this personal information and we are able to confirm your identity, we will, except in very limited circumstances, provide you with this personal information.

# 3. The right to rectification

If you think your information is inaccurate or incomplete, or if your contact details change, please ask us to amend it by contacting jenny@bacchus.enterprises.

### 4. The right to erasure

Australia does not currently enforce the right to be forgotten (also known as the right to erasure), however, we will happily delete your data if requested, unless we have a legal obligation to keep it.

When you ask us to delete your personal information, we may clarify with you whether instead you no longer wish to hear from us again. If this is the case, we may retain limited information about you to make sure you are removed from all future marketing lists.

# 5. The right to transfer your personal information (known as data portability)

You have the right to move, copy or transfer your personal information from one organisation to another. If you wish to transfer your personal information, we would be happy to help. If you ask for a data transfer, we will give you a copy of your personal information in a structured, commonly used and machine-readable form (for instance, in a CSV file format). We can provide the personal information to you directly. When making a transfer request, it would be helpful if you can identify exactly what personal information you wish us to transfer. We will comply with your request within one month or, if the request is complex or there are several requests from you, within two months.

## 6. The right to object

If you would like us to stop processing your personal information:

- (a) for marketing purposes;
- (b) on the basis of legitimate interests;
- (c) for research purposes

If you would like to exercise any of the above rights or if you have any questions or complaints, please contact jenny@bacchus.enterprises ACN 638 188 940 ABN 51638188940

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### On the website:

Visitor comments made on the Bacchus Academy website may be checked through an automated spam detection service.

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognize and approve any follow-up comments automatically instead of holding them in a moderation queue. For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

When visitors leave comments on the site we collect the data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection. An anonymised string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available here: <a href="https://automattic.com/privacy/">https://automattic.com/privacy/</a>.

After approval of your comment, your profile picture is visible to the public in the context of your comment.

#### **Contact forms**

If you send a message through the website contact forms, they will be sent as an email to jenny@bacchus.enterprises

#### Media

If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.

#### Embedded content from other websites

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

## **Policy Update**

We may update this policy from time to time to take account of any new business activity or to reflect any changes in law or best practice in relation to data protection. We will seek to make you aware of any significant changes to this policy by placing an update notice on our website.

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