Espresso Works Online Privacy Policy

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1 Respecting your privacy

Espresso Works is committed to compliance with privacy laws which apply to its businesses and which set out standards for the management of personal information. This policy outlines our personal information management practices. Specifically:

- the kinds of personal information we collect and hold;
- · how we collect and hold it;
- the purposes for which we collect, hold, use and disclose it;
- · your right to access and seek correction of it;
- · how you may complain about privacy matters; and
- our sharing of your personal information overseas.

There are some matters to which this policy does not apply. These are referred to below (see clause 9 below).

2 What kinds of personal information do we collect and hold?

The personal information we collect and hold is what is reasonably necessary for our business functions and activities. When we collect and hold personal information, it is of the following kinds:

- your personal details such as your name, addresses, telephone numbers, age and gender;
- what, how and when you buy from us or have expressed an interest in buying from us;
- your stated or likely preferences, for example whether you may be interested in particular products or promotions.

3 How do we collect and hold personal information?

Collection of personal information: When we collect personal information about you, we do so by making a record of it. We do this when:

- you register with us, for example to create an account, to become a member of one of our clubs or loyalty programs or to send you information;
- you make a purchase with Espresso Works, directly, online or otherwise;
- · you communicate with us online;
- you take part in our promotions, competitions, testimonials, surveys and focus groups;
- you deal with us in other ways involving a need for personal information to be provided such as when you make a lay-by, contact one of our call centres or bring a claim against us.

We may also collect personal information about you by accessing data from other sources and then analysing that data together with the information we already hold about you in order to learn more about your likely preferences and interests. When you visit our websites, social media pages or mobile applications or click on our advertisements on the online media of other companies, we may collect information about you using technology which is not apparent to you, for example "cookies". For information about our use of this technology, see below to view Cookie Statement.

Most of the personal information we collect and hold about you is from your direct dealings with us. We may sometimes collect your personal information other than from you directly. For example from other suppliers who, in common with us, have a relationship with you. Holding of personal information: Personal information we hold is generally stored in computer systems. These may be operated by us or by our service providers. In all cases, we have rigorous information security requirements aimed at eliminating risks of unauthorised access to, and loss, misuse or wrongful alteration of, personal information.

4 Why do we collect, hold, use and disclose personal information?

When we collect, hold and use your personal information, we do so primarily to sell and promote our goods and services to you and to improve on the range of our offerings. For example:

- to learn of your likely preferences so that we may promote our goods and services to you in a way which may be of most interest to you; and
- to assist in investigating your complaints and enquiries. We disclose personal information we collect for purposes which are incidental to the sale and promotion of our goods and services to you. For example, we may disclose your personal information within our group, to service providers who assist us in our day-to-day business operations and as part of buying or selling businesses.

We may collect, hold, use and disclose your personal information for other purposes which are within reasonable expectations or where permitted by law. When marketing to you, your personal information is only ever used or disclosed for Espresso Work's own purposes. You may opt out of our direct marketing to you. Our direct marketing materials will tell you how to do this.

5 How can you enquire about, access and correct your personal information?

Access: We will provide you with access to any of your personal information we hold (except in limited circumstances recognised by law). If you wish to access your personal information or have an enquiry about privacy, please contact Espresso Works at info@espressoworks.com.au or by calling us on 08 6161 6006.

Before we provide you with access to your personal information we may require some proof of identity. We may charge a reasonable fee for giving access to your personal information if your request requires substantial effort on our part.

Correction: If you need to correct your personal information, please contact our Privacy Officer at one of the above contact points.

6 How can you complain about our management of personal information?

If you wish to complain about a breach of the privacy rules that bind us, you may contact Espresso Works on 08 6161 6006. We may ask you to put your complaint in writing and to provide details about it. We may discuss your complaint with our personnel and our service providers and others as appropriate.

Espresso Works will investigate the matter and attempt to resolve it in a timely way. We will inform you in writing about the outcome of the investigation. If we do not resolve your complaint to your satisfaction and no other complaint resolution procedures are agreed or required by law, we will inform you that your complaint may be referred to the Privacy Commissioner for further investigation and will provide you with the Commissioner's contact details.

7 Our sharing of your personal information overseas

It is our policy to require all of our overseas sharing of personal information to be done in a way which requires observance of strict privacy and security standards, both during transit and at the overseas destination. We may allow your personal information to be shared with those who are in countries other than your own location. We do this:

- where we have made a business decision to store our data with a trusted service provider who is in the business of providing data storage and processing services. Examples are those who store and process our email and mobile application data. These services commonly involve diverse geographic locations which change from time to time for reasons which include data protection and processing efficiency. Where these services are used by us, it is not practical for us to notify you of which country your personal information may be located in; and
- for disclosures between our group companies. Our main business locations are in Australia, Asia and New Zealand, but some of our group companies may be based in other countries from time to time.
- when our business which collected your personal information is in a different country to your location;
- when our supply to you necessarily involves overseas disclosures.

• where you are involved with public liability issues concerning a product we may disclose your personal information to any overseas supplier of such a product in the course of managing those issues.

8 Updates

This privacy policy is current at the date of your order. We may change it from time to time at our discretion.

9 Other privacy terms and limits of this policy

This is a policy. There may be additional privacy notices and terms relevant to you depending on the nature of your dealings with us and on our particular businesses. There are additional privacy terms in our loyalty program and club membership contracts and for use of our online sites, for example. We have separate charters concerning our employees – this policy does not apply to the personal information of our employees in their capacity as such.

10 More information

More information about privacy law and privacy principles is available from us, please contact Espresso Works at info@espressoworks.com.au or by calling us on 08 6161 6006.

11 Cookie statement

About this statement

This statement gives you information about our use of cookies. This is relevant to when you use your computer or mobile device to visit online content (such as websites and mobile apps) which display or promote us or our goods or services. The content may be our own, or may be the content of others in which we have an interest, such as our banner advertisements.

Cookies may be arranged ("set") by us or by others under an arrangement with us, such as companies whose business it is to analyse information. We may also access information from cookies set by others ("3rd party cookies").

Why should you know about cookies?

You should know about cookies because they involve the collection of information about you (which may or may not be personal information) in a way which may not be obvious to you.

What is a cookie?

Cookies are small pieces of information captured when your device is used to access online content. Cookies are stored in your device by the person who arranges for the cookie to be set. This person may be the provider of the content being accessed. It might be a 3rd party cookies are used to provide information about your device's access to more than one discrete site or data set.

Why do we allow cookies to be used?

We allow cookies to be used for three reasons.

First, we allow session cookies to be used when you visit our online content. This enables your device to move from page to page without having to log in repeatedly. These generally improve your browsing experience.

Secondly, we allow persistent (permanent) cookies to be used to better inform how the content your device visits may be presented to you. Persistent cookies can store your preferences for a particular site, so they will be remembered when the site is visited again.

Thirdly, we allow persistent and other kinds of permanent cookies (such as "flash" cookies) to be set and we access information from 3rd party cookies in order to assist in compiling and analysing the types of online content you visit and your interaction with that content. This assists us to assess what promotions to make to you, when and how. It also assists us to measure the effectiveness of our promotions.

What are your choices about cookies?

You can control the extent to which your device allows cookies to be set on it. You can do this by changing the settings on the software your device uses to access the internet (your browser software). For example, depending on which browser your device uses, you may be able to disable third party cookies.

There is a lot of information available online about how cookies work and how to change your browser's cookie preferences.