

VSF Privacy & Data Protection Policy

What is this Privacy & Data Protection Policy for?

This Policy is for this website www.vsf.wine and served by Vin Sans Fin Education Ltd. (trading as 'VSF Wine Education', '尝乐', '尝乐品酒教育', '嚐樂' and '嚐樂品酒教育', referred to as 'VSF', 'we', 'us' or 'our' hereinafter) and governs the privacy of its users (referred to as 'you' or 'your' hereinafter) who choose to use it.

The Policy sets out the different areas where user privacy is concerned and outlines the obligations and requirements of the users, the website and website owners. Furthermore, the way this website processes, stores and protects user data and information will also be detailed within this policy.

The Website

This website is not intended for minors under 18 years of age and we do not knowingly collect data relating to minors. This website and its owners take a proactive approach to user privacy and ensure that necessary steps are taken to protect the privacy of its users throughout their visiting experience. This website complies with all UK national laws and requirements as well as EU-wide laws and regulations for user privacy, including but not limited to the General Data Protection Regulation (hereinafter "GDPR") that became effective on 25th May 2018 .

Cookies Policy

Our website uses cookies to improve users' experience while visiting the website. For details, please refer to the separate document entitled "VSF Cookies Policy" available on our website.

Contact & Communication

Users contacting this website and/or its owners do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use, as detailed in the GDPR. Every effort has been made to ensure safe and secure forms to submit your personal information.

We will only use your personal information for the purposes we clearly state at the point at which you provide it to us – for example, when you register for one of our events, submit an enquiry, subscribe to our newsletter, or order any of our products or services.

We will only share your personal information with our employees, contractors, agents or professional advisors where it is necessary in order to fulfil a valid, stated purpose, as above. Each and every marketing message we send you, via whatever medium, will also include an appropriate and easy way for you to opt out of receiving further communications of that type.

The Data that We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, marital status, title, date of birth, personal photograph and gender.
- **Contact Data** includes billing address, delivery address, residential address, email address and telephone numbers.
- **Financial Data** includes bank account and the last 4 digits and date of expiry of your payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use and interact with our websites and/or other websites, our mobile apps, products and services, and the frequency with which you use and interact with our websites and/or other websites, our mobile apps, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated

Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How We Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To complete orders placed by you including; sending you emails, invoices, receipts, tickets and alerting you of any issues with the order. To enable third parties to process credit card transactions securely, we send your billing information to the same third parties to process your orders and credit card payments.
Where you purchase tickets for an event or course, your Identity Data, Contact Data and Financial Data may be shared with the relevant parties (including but not limited to the Wine & Spirit Education Trust (hereinafter the “WSET”)) for purposes such as exam registration and the issuance of certificates.
- To send you messages about our services, including temporary or permanent changes to our services such as planned outages, new features & releases, abuse warnings and changes to this policy.
- To communicate with our users about their registered events/courses and provide customer care.
- To send you emails and other information and promotional content in accordance with your marketing preferences.
- To enforce compliance with our relevant Terms & Conditions and applicable laws.
- To protect the rights and safety of our users and third parties as well as our own.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our **Legitimate Interests** (or those of a third party such as the WSET) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal, professional, security or regulatory obligation.
- Where we need to protect against legal liability and/or protect and defend our rights or property

The information we collect about how you and when you use our services may be stored in log files associated with your account, and may be linked to other information we collect about you. This information may include Technical Data such as your IP address and the browser that you used, and the time and date you used our websites and/or mobile apps

and any actions you have taken within the websites, White Label Websites and/or our mobile apps. Linking the information we collect about you helps us to improve our services for you and other users of our websites and mobile apps.

Email Newsletter

This website operates an email newsletter program, used to inform subscribers about the products and services supplied by VSF and/or events organised by VSF. Users can subscribe through an online automated process should they wish to do so but do so at their own discretion. Some subscriptions may be manually processed through prior written agreement with the user.

Subscriptions are taken in compliance with the GDPR 2018. All personal details relating to subscriptions are held securely and in accordance with the GDPR 2018. No personal details are passed on to third parties nor shared with companies / people outside of the company that operates this website. Under the GDPR 2018 you may request a copy of personal information held about you by this website's email newsletter program. A small fee may be payable. If you would like a copy of the information held on you, please write to the Data Privacy Manager using the business address indicated at the bottom of this policy.

Email marketing campaigns published by this website or its owners may contain tracking facilities within the actual email. Subscriber activity is tracked and stored in a database for future analysis and evaluation. Such tracked activity may include but not limited to the opening of emails, forwarding of emails, the clicking of links within the email content, times, dates and frequency of activity.

This information is used to refine future email campaigns and supply the user with more relevant content based around their activity.

In compliance with the GDPR 2018, subscribers are given the opportunity to un-subscribe / opt-out at any time through an automated system. This process is detailed at the footer of each email campaign. If an automated un-subscription system is unavailable, clear instructions on how to un-subscribe / opt-out will be detailed instead.

External Links

Although this website only looks to include quality, safe and relevant external links, users are advised to adopt a policy of caution before clicking any external web links (i.e. clickable texts / banners / images linking to other websites) mentioned throughout this website.

The owners of this website cannot guarantee or verify the contents of any externally linked website despite their best efforts. Users should therefore note that they click on external links at their own risk, and that this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

Adverts and Sponsored Links

This website may contain sponsored links and adverts. These will typically be served through our advertising partners, who may have detailed privacy policies relating directly to the adverts they serve.

Clicking on any such adverts will send you to the advertiser's website through a referral program which may use cookies and will track the number of referrals sent from this website. This may include the use of cookies which may in turn be saved on your computer's hard drive. Users should therefore note that they click on sponsored external links at their own risk, and that this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

Social Media Platforms

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are governed by the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate/engage upon them with due care and caution in regard to their own privacy and personal details. Neither this website nor its owners will ever ask for personal or sensitive information through social media platforms. We encourage users wishing to discuss sensitive details to contact us through primary communication channels such as by telephone or email.

This website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

Shortened Links in Social Media

This website and its owners through their social media platform accounts may share web links to relevant web pages. By default, some social media platforms shorten lengthy URLs.

Users are advised to take caution and good judgement before clicking any shortened URLs published on social media platforms by this website and its owners. Despite the best efforts to ensure only genuine URLs are published, many social media platforms are prone to spam and hacking, and therefore this website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

Language & Applicable Laws

This Policy is written in the English language and may be subsequently translated into different languages. The English version of this Policy shall therefore prevail in case of dispute and discrepancy between different language versions. This Policy shall be governed by and construed in accordance with the law of England and Wales and any applicable EU-wide laws, directives and regulations.

Contact Us:

Data Privacy Manager

VSF Wine Education

*a trading name of Vin Sans Fin Education Ltd.
(registered in England and Wales)*

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Last updated: 29 November 2022