

Whenever Wherever

Privacy Policy

Mondriaan Wine Global Privacy Policy

November, 2011

INFORMATION ABOUT US

Mondriaan Wine is registered in The Netherlands under company number 24406344 with a registered office and main trading address at Straatweg 177, 3054 AD Rotterdam, The Netherlands. Our VAT number is NL8173.90.765.B01.

We are committed to protecting and respecting your privacy. This Global Privacy Policy (together with the Mondriaan Wine Global User <u>Terms and Conditions</u>) and any other documents referred to in them govern our use of information gathered about you. Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it. Although We are committed to maintaining your confidence and trust in all of our activities with you, this Global Privacy Policy does not govern our collection or use of data about you through channels other than our sites (as defined below).

Please exit our sites immediately if you do not accept this Global Privacy Policy, are not of a legal age for consuming alcoholic beverages in the country or other territory in which you are located, or are accessing our sites in a country or other territory where use of our site is not permitted.

DATA WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide by filling in forms on our website(s) operated by Mondriaan Wine (here after defined as "our sites"). This includes information provided at the time of registering to use any of our sites, subscribing to any services offered on our sites including but not limited to interactive services, posting material or requesting further services. We may also ask you for information when you enter a competition or promotion sponsored by Mondriaan Wine, and when you report a problem with any of our sites;
- The correct country or other territory in which you are located or are accessing our sites and your correct date of birth, which We require that you submit accurately to ensure that you do not access our sites if you are not of a legal age for consuming alcoholic beverages in the country or other territory in which you are located or are accessing our sites;
- If you contact us, We may keep a record of that correspondence;
- Mondriaan Wine may also ask you to complete surveys to be used for research purposes, although you do not have to respond to them;

Mondriaanwine

Whenever Wherever

- Details of any transactions you carry out through any of our sites and of the fulfilment of any orders by you; and
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

IP ADDRESSES AND COOKIES

We may collect information about your computer (including, where available, your IP address, operating system and browser type) for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. Our Internet servers may also keep track of the number of visitors to our sites, the pages they visited and how long they stayed. None of this information includes any personal information about you.

For the same reason, We may obtain information about your general Internet usage by using a "cookie" file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. Some cookies load automatically unless otherwise disabled by the computer user, whilst others may require that you affirmatively accept them (such as a "remember me" option). Cookies help us to improve our sites and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern;
- To store information about your preferences, allowing us to customise our sites according to your individual interests;
- To speed up your searches; and
- To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies, however, by doing so you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

WHERE WE STORE YOUR PERSONAL DATA

The data that We collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") including but not limited to the USA. Data We collect may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or service providers. By submitting your personal data, you agree to this transfer, storing or processing. We will take reasonable steps to ensure that your data is treated securely and in accordance with this Global Privacy Policy.

Mondriaanwine

Whenever Wherever

The information you provide to us is stored on our secure servers. Where We have given you (or where you have chosen) a user identification code, password or any other piece of information as a part of a registration scheme or a security procedure to enable you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. In particular, you should not share your password with anyone who is not of legal drinking age in the country or other territory in which you are located or are accessing our sites or to anyone in a country or other territory where use of our sites is not permitted.

Unfortunately, the transmission of information via the Internet is not completely secure. Although We will do our best to protect your personal data, We cannot guarantee the security of your data transmitted to any of our sites; any transmission is at your own risk. Once We have received your information, We will use strict procedures and security features to try to prevent unauthorised access.

OUR USE OF YOUR INFORMATION

We use information held about you in the following ways:

- To ensure that content from our sites is presented in the most effective manner for you and for your computer;
- To provide you with information, products or services that you request from us or which We feel may interest you, where you have consented to be contacted for such purposes;
- To allow you to participate in interactive features of our service when you choose to do so;
- To notify you about changes to our service; and
- To provide you with information about goods and services which may be of interest to you.

We also reserve the right to share information with other organisations in the following situations:

- As permitted by law in order to investigate, prevent or take action regarding illegal activities, suspected fraud, violation of our intellectual property rights, situations involving potential threats to the physical safety of any person, violation of Mondriaan Wine's Global User Terms and Conditions or other agreements, or as required by law;
- When We have your consent to do so; and
- When We need to share information to provide any product or service you have requested.

If you are an existing customer, We will only contact you by appropriate electronic means with information about goods and services similar to those which were the subject of a previous sale to you. If you are a new customer, and where We permit



Whenever Wherever

selected third parties to use your data, We (or they) will contact you by electronic means only if you have consented to this.

DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to the following selected third parties:

- Our advertising and promotional agencies and consultants and those organisations selected by us to analyse or evaluate our data collection process or customer service fulfilment;
- Unaffiliated service providers with whom Mondriaan Wine may subcontract, including website hosting companies, fulfilment companies and other third party service providers;
- The prospective seller or buyer (other than Mondriaan Wine) of any Mondriaan Wine's business or assets, including where a Mondriaan Wine or substantially all of its assets is acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- If We are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation, or in order to enforce or apply the Mondriaan Wine Global User Terms and Conditions and other agreements; or to protect the rights, property, or safety of the Mondriaan Wine, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

LINKS TO AND FROM OUR SITE

Our sites may, from time to time, contain links to and from the websites of our partner networks, creative partners and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that We do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

VARIATIONS

We may revise this Privacy Policy at any time by amending this page. Each time you use our sites, the current version of the Privacy Policy will apply. Accordingly, when you use our sites, you should check the date of the Privacy Policy (which appears at the top right hand corner) and review any changes since the last version.

CHILDREN

Our sites are designed to appeal to adults. We do not knowingly solicit any information from children nor do we knowingly market or otherwise target our sites or its products or services to children. If we become aware that a visitor to our sites is under the legal drinking age in the country or other territory in which he or she is



Whenever Wherever

located at the relevant time and has registered without verifiable parental consent, we will remove his or her personal information from our files.

CONTACT

Questions, comments and requests regarding this Global Privacy Policy are welcomed and should be addressed to:

Mondriaan Wine Straatweg 177 3054 AD Rotterdam The Netherlands contact@mondriaanwine.com