

Privacy Policy



PREPARED FOR
End User

PREPARED BY
ClubCellars

Privacy Policy

This Privacy Policy (herein referred to as “Policy”) explains how ClubCellars (herein referred to as the “Company,” “we,” “us,” or “our”) processes Personal Data that we collect from you (herein referred to as the “Subscriber”) as a Controller.

1. DEFINITIONS.

(a) “**Controller**” means the natural or legal person, public authority, agency, or other body, which alone or jointly with others, determines the purposes and means of processing Personal Data.

(b) “**Personal Data**” means any information relating to an identified or identifiable natural person (“**data subject**”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

(c) “**Service(s)**” means wine ordering for members of private clubs.

(i) “**Subscriber**” means the natural or legal person who has subscribed to the Service(s) by agreeing to the Terms.

(ii) “**Terms**” means the binding contract between the Company and Subscriber that governs the Subscriber's access and use of the Service(s).

2. DATA COLLECTION.

The Subscriber directly provides the Company with most of the data we collect. The Company collects Personal Data from the Subscriber from the following sources:

User submitted order data from iOS App

3. PROCESSING OF PERSONAL DATA.

(a) The Company processes the Subscriber’s Personal Data to to process orders and consolidation of items ordered from an event..

(b) The Company will generally collect Personal Data from Subscribers only where it needs to create a contract with the Subscriber, where the processing is in the Company’s legitimate interests and

not overridden by the Subscriber's data protection interests or fundamental rights and freedoms, or where the Company has the Subscriber's consent. In some cases, the Company may also have a legal obligation to collect Personal Data from the Subscriber.

(c) If the Company processes Personal Data with the Subscriber's consent, the Subscriber may withdraw their consent at any time.

4. SHARING OF PERSONAL DATA.

(a) The Subscriber acknowledges that the Company may share the Subscriber's Personal Data with its group companies and third-party service providers to offer the Subscriber the Company's Service(s) and/or send information or updates about the Service(s).

(b) When the Company processes the Subscriber's order, it may send the Subscriber's Personal Data and use the resulting information from credit reference agencies to prevent fraudulent purchases.

(c) The Company shares Personal Data in the following instances For processing and fulfilling orders at the private club hosting the event..

5. RETENTION OF PERSONAL DATA.

(a) Company retains the Personal Data when an ongoing legitimate business requires retention of such Personal Data.

(b) In the absence of a need to retain Personal Data, the Company will either delete or aggregate it. If this is not possible, the Company will securely store your Personal Data and isolate it from any further processing until it is deleted.

6. SECURITY OF PERSONAL DATA.

The Company uses appropriate technical and organizational measures to protect the Personal Data it collects and processes. These measures are designed to provide a high level of security appropriate to the risk of processing the Subscriber's Personal Data. If you are a Subscriber and have any concerns about the security of your Personal Data, please contact us immediately.

7. MODIFICATION.

The Company keeps this Policy under regular review and may update this webpage at any time. This Policy may be amended at any time, and the Subscriber shall be notified only if there are material changes to this Policy.

8. CONTACT DETAILS.

If you have any concerns about this Policy, please get in touch with us at griffin@clubcellars.com.

ACCEPTANCE AND SIGNATURE.

End User

Name:

Signature:

Date:

ClubCellars

Name:

Signature:

Date: