

## **PRIVACY POLICY & DATA PROTECTION**

At McCaine Wine Education, we want you to know that we are committed to protecting your privacy and that we fully support the Personal Data (Privacy) Ordinance.

<https://www.gov.hk/en/about/privacy.htm>

### **PRIVACY IS IMPORTANT**

We recognise that privacy of personal information is important to individuals. Personal information for our business purposes is to be minimal, private, correct, safe and largely in the control of the individual. Except where otherwise legally appropriate we will treat your personal information as private.

### **OBTAINING PERSONAL INFORMATION**

Because of the nature of McCaine Wine Education it is necessary to obtain personal information. We will however not be unduly intrusive nor obtain or use information in an inappropriate manner. We will only ask for and use personal information we reasonably need to conduct our business.

If you have received any promotional material and do not wish to receive it then upon letting us know we will not send it to you. Alternatively, you can click the 'unsubscribe' link on our emails or contact us directly.

### **SAFEKEEPING AND NEED-TO-KNOW HANDLING**

All your personal details are stored in a single, secure database on our premises. Access is controlled and limited to our staff who manage the administration of the accounts.

### **YOUR ACCESS AND CONTROL**

However, in accordance with the privacy law we give you access to your personal information we hold and you can correct misinformation (except where it would be inappropriate or exempted by law e.g. - where it would require disclosing someone else's personal information, but we will provide you with reasons).

### **YOUR SAY ON YOUR PRIVACY**

If you have a particular concern or query about your personal information held by us you should contact us: [wset@mcwe-edu.com](mailto:wset@mcwe-edu.com)

McCaine Wine Education Approved Programme Provider has a Data Protection Policy as follows:

McCaine Wine Education will hold student details for internal marketing purposes only and will pass necessary student information to WSET Awards for course and exam registrations. We are required to comply with privacy and data protection laws. This policy sets out principles we will apply when handling individuals' personal information. By submitting data to McCaine Wine Education, individuals authorise us to process data in accordance with this policy.

#### **DEFINITION OF DATA**

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

#### **COMMUNICATION DATA**

Includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

#### **CUSTOMER DATA**

Includes data relating to any purchases of goods and/or services such as your name, title, date of birth, billing address, delivery address, email address, phone number, contact details, purchase details and your card details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.

#### **USER DATA**

That includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back-ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

## **TECHNICAL DATA**

That includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.

## **MARKETING DATA**

That includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy. We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interests, which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

## **SENSITIVE DATA**

Includes food allergies and other dietary requirements and special exam requirements, including medical conditions that require access considerations or alterations to the exam conditions. We only collect this information about you in order to deliver our training courses and events in the most sensitive and effective manner. Our lawful ground for this processing is contractual as may otherwise be unable to deliver our events or training courses appropriately. This information is only held or used by us and in communication with the relevant venue / caterer. If you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver appropriate food or exam conditions). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time. We will only

use your sensitive data in relation to the particular event for which it was collected.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

#### **DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below:

1. Service providers who provide IT and system administration services
2. Examination bodies that accredit qualifications, such as WSET Wine & Spirit Education Trust
3. Government bodies that require us to report processing activities
4. Third parties i.e. partner businesses McCain Corporation Limited to whom we sell, transfer, or merge parts of our business or our assets in the future
5. We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions

#### **DATA SECURITY**

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

#### **DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for 7 years after they stop being

customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

At any time, a student can request to see what information is held about them and can request for the information to be updated or removed from McCaine Wine Education database (after examination and assessment).

We will keep course and student records for a minimum of 3 years and should be able to produce these for inspection by WSET and/or the Regulator on request. These include:

- Candidate enrolment/registration data – for classes and for assessments.
- Class lists and attendance registers.
- Course programmes, session plans and educator lists (you must be able to demonstrate which educator taught which sessions on any class in the previous 3 years).
- Records of samples shown on each course (including vintages, suppliers and cost).
- Candidate results.
- Nominated Educator Peer Review Forms (or equivalent).
- Student feedback forms.
- Requests for Reasonable Adjustments and Special Consideration.

Please refer to WSET Privacy policy that published at <https://www.wsetglobal.com/privacyand-cookie-policy> or WSET via [dpc@wsetglobal.com](mailto:dpc@wsetglobal.com) if any further concern.