

# Protection of personal data

## Our Details

The website, <u>www.wineindustry.es</u> is operated by Wine Industry. The design is created through <u>www.wix.com</u>.

Our company is registered in Spain as Iván González Gaínza (DNI 78610668A. Our principal business is online.

You can contact us by telephone on +34 971 902 179 or by email, using wineindustrymallorca@gmail.com.

When we say 'we', 'us', 'our' or 'Wine Industry' we are referring to our business partnership, Iván González Gaínza and Lara Corfield. We own and run the business Wine Industry.

## Usage and storage of personal information

Wine Industry, in respect of current regulations on the protection of personal data, informs that any personal data submitted to us through the forms on our website: <u>www.wineindustry.es</u>, will be used for the purposes specified in this policy or in accordance with the users of our services.

The collection and automated processing of personal data is required in order to maintain the commercial relationship and the performance of specific tasks, training, advice or any other activities related to our business.

The data will only be transferred to other entities when it is necessary, for the sole purpose of fulfilling the points mentioned above.

Wine Industry takes the necessary measures to ensure the security, integrity and confidentiality of any data in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and their free movement.

The user may at any time exercise their right of access, opposition, rectification and cancellation recognized in the aforementioned Regulation (EU). The exercise of these rights can be done by the user through email to: wineindustrymallorca@gmail.com or to the address: C / Pedregal 13, 1 °, 07014, Palma de Mallorca.

Users of our website state that all data provided by him/her are true and correct, and agree to keep the data updated as necessary, communicating any relevant changes to Wine Industry.

### The type of personal information we collect

- We collect personal data about the visitors and users of our site.
- First names and last names we collect your full name because we would like to know who is requesting our services. We may also require your full name for invoicing purposes.
- Address we request this information so that we know where to go when you book or request one of our services. We may also require the address for invoicing purposes.
- Phone and email address we request your contact details so that we can maintain relevant communication with you.
- Age we may also request confirmation of your age in order to ensure we are complying with local laws in relation to the sale of alcohol and alcohol related services.
- ID or CIF number we may request this information for invoicing purposes.
- Gender / age range / nationality we may ask for this information for analysis and marketing purposes.

#### Purpose of the processing of personal data:

#### For what purpose will we use your personal data?

At Wine Industry, we will use your personal data collected through the website: <u>www.wineindustry.es</u> for the following purposes:

- 1. For goods and services you book / order directly through <u>www.wineindustry.es</u>, in order to maintain a contractual relationship, as well as for the management of the booking, administration, information, provision and any improvements to our services.
- 2. To send any requested information through the forms provided on the website www.wineindustry.es
- 3. To send bulletins (newsletters), as well as any other commercial communication relating to promotions and / or the advertising of Wine Industry and its sector.

We would like to remind you that you can oppose the sending of commercial communication by any means and at any time, Simply send an email to <u>wineindustrymallorca@gmail.com</u>.

When we require your personal information to comply with legal or contractual obligations, the provision of such data is mandatory. If such data is not provided, then we will not be able to manage a contractual relationship with you, or to meet obligations placed on us.

#### How long do we retain collected personal data?

We retain your personal information for as long as necessary to provide our services to you and to comply with our legal obligations. If you request the removal of your personal information, we will retain details from deleted accounts as necessary to comply with the law and keep data relating to invoices and expenses in relation to Wine Industry. The information we retain will be handled in accordance with this Privacy Policy.

## Legitimation:

We use your data when the following actions legitimize it:

- 1. The request for information and / or the hiring of Wine Industry's services, whose terms and conditions will be made available to you as relevant, prior to any possible contractual agreement.
- 2. Free, specific, informed and unambiguous consent. We make this privacy policy available to you, which after reading it, if you agree, you can accept by a statement or clear affirmative action, such as the marking of the box provided for this purpose.

If you do not provide us with your information or you do it in an erroneous or incomplete way, we will not be able to attend to your request, since it is impossible to provide you with the information requested or to carry out the contracting of our services.

#### **Recipients:**

As treatment managers, we use or hire the following service providers, having committed to compliance with the regulatory provisions, applicable in terms of data protection:

• (RESPONSIBLE) LGS Asesores & Brokers SL, with address at Gran Via Asima 20, 2nd office 10, NIF / CIF no B16537433, provides advisory / tax services.

+ You can consult the privacy policy and other legal aspects of this company at the following link: <u>www.lgsasesores.es/politica-de-privacidad.php</u>

• (MANAGER) Wix.com, with registered address at Wix Online Platforms Limited, 1 Grant's Row, Dublin 2 D02HX96, Ireland, provides web page provider services.

A You can consult the privacy policy and other legal aspects of this company at the following link: https://www.wix.com/about/privacy

## Data collected by users of the services

In cases where the user includes files with personal data on shared hosting servers, Wine Industry is not responsible for any breach of the GDPR by the user.

#### Data retention in accordance with the LSSI

Wine Industry informs you that, as a provider of a data hosting service and under the provisions of Law 34/2002 of July 11, Services of the Information Society and Electronic Commerce (LISS-EC), we will retain for a maximum period of 12 months any information essential to identify the origin of the data, from the time when the provision of the service began.

The retention of this data does not affect the secrecy of communications and may only be used in the framework of a criminal investigation or for the safeguarding of public safety, placing itself at the disposal of judges and / or courts or the Ministry that so requires the information.

The communication of data to the Forces and Bodies of the State will be done in virtue of the provisions of the regulations on the protection of personal data.

## Intellectual property rights

Wine Industry is the owner of all copyright, intellectual property, industrial "know how" and any other rights relating to the contents of the website <u>www.wineindustry.es</u> and the services offered therein, as well as the programmes necessary for its implementation plus related information. The reproduction, publication and / or non-strictly private use of the contents (total or partial), of the website <u>www.wineindustry.es</u> without prior written consent is not allowed.

### Intellectual property of the software

The user must respect the third party programmes placed at their disposal by Wine Industry, even if they are free and / or publicly available.

Wine Industry has the necessary exploitation and intellectual property rights of the software.

The user must not acquire any right or license for any service contracted on the software necessary for the provision of the said service, nor on the technical information that monitors the service, except for the rights and licenses necessary for the fulfillment of the services contracted and only during the duration of them.

For any action that is outside the fulfillment of their contract, the user will need authorization in writing from Wine Industry. The user is forbidden to access, modify, or re-visualize the configuration, structure and files of the servers owned by Wine Industry, assuming civil responsibility and criminal activity arising from any incident that could occur in the servers and security systems as a direct result of negligent or malicious action on the user's part.

#### Intellectual property of the hosted contents

The use contrary to the legislation on intellectual property of the services provided by Wine Industry and, in particular, of:

• The use that is contrary to Spanish laws or that infringes the rights of third parties.

• The publication or transmission of any content that, in the opinion of Wine Industry, is violent, obscene, abusive, illegal, racial, xenophobic or defamatory.

• The cracks, serial numbers of programmes or any other content that infringes the intellectual property rights of third parties.

• The collection and / or use of personal data of other users without their express consent or in contravention of the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, concerning the protection of persons physical as regards the processing of personal data and the free movement of them.

• The use of the mail server of the domain and of the email addresses for the sending of unwanted mass mail.

The user has full responsibility for the content of its website, transmitted and stored information, hypertext links, claims of third parties and legal actions in reference to intellectual property, third party rights and protection of minors.

The user is responsible with respect to the laws and regulations in force and the rules that have to do with the operation of the online service, electronic commerce, copyright, maintenance of public order, as well as universal principles of Internet use.

The user will indemnify Wine Industry for the expenses generated by the imputation of Wine Industry in any case whose responsibility was attributable to the user, including fees and expenses of legal defense, even in the case of a non-final judicial decision.

## Protection of hosted information

Wine Industry makes backup copies of the contents housed in its servers, but is not responsible for the loss or accidental deletion of data by users. Similarly, it does not guarantee the total replacement of data deleted by users, since the aforementioned data could have been deleted and / or modified during the period of time since the last backup.

The services offered, except the specific backup services, do not include the replacement of the contents preserved in the backup copies made by Wine Industry, when this loss is attributable to the user; in this case, a rate will be determined according to the complexity and volume of the recovery, always upon user acceptance.

The replacement of deleted data is only included in the price of the service when the loss of content is due to causes attributable to Wine Industry.

### Commercial communications

For the application of the LISS-EC, Wine Industry will not send you any advertising or promotional communications by electronic mail or any other electronic means of communication unless they have been previously requested or expressly authorized by the recipients through the subscription of our Wine Club or by direct communication.

In the case of users with whom there is a prior contractual relationship, Wine Industry is authorized to send commercial communications regarding products or services relating to Wine Industry that are similar to those that were originally the object of contractual obligations with the client.

In any case, the user, after providing his / her identity, may request that no more commercial information be sent to him / her through the Customer Service channels previously indicated.

### Updating this policy

We will need to change this policy from time to time in order to make sure it stays up to date with the latest legal requirements. We may also need to update any information relating to Wine Industry and the way in which we conduct our business.

When we do change the policy, we will notify you of any changes as relevant. A copy of the latest version of this policy will always be available on this page of our website.

If you have any questions about our privacy policy or the way in which we have been managing your personal information, please contact us at <u>wineIndustrymaliorca@gmall.com</u>.