

PRIVACY POLICY

BASIC INFORMATION ON DATA PROTECTION

Website: <https://cloud.gonzalezbyass.site/soberano>

Website Owner: GONZALEZ BYASS UK, LTD.

Purpose:

Your personal data Will be processed by the Company only for specified, explicit and legitimate purposes and Will not be processed in a way that is incompatible with those purposes. Mainly, the Company may process your data to manage your registration as a user of this website, to manage your purchases, to answer your queries, to comply with its legal obligations, to improve our services and products and, when requested, to send you personalised communications. This information can be found in the section: "Additional information on data protection".

Legitimation:

The Company will process your data only if one of the following conditions is met:

- (a) You have given your consent for one or more specific purpose(s)
- b) The processing is necessary for the performance of a contract to which you are a party
- c) The processing is necessary for the performance of a legal obligation on the part of the Company
- d) The processing is necessary to meet the legitimate interests of the Company (or a third party), provided that such interests are not overridden by the interests or fundamental rights and freedoms of the user. This information can be found in the section: "Additional information on data protection".

Legal age of consent:

Since, by accessing this website you certify that you are over 18 years of age, you have the necessary legal capacity to consent to the processing of your personal data, in accordance with the provisions of this Privacy Policy and the Terms of Use of this website.

Addressees:

Data will be communicated to third parties or companies of the González Byass Group that provide services to the Company, and that may be located outside or inside the European Union, in order to carry out the purposes described in this Privacy Policy.

If the User gives his express consent, data may be transferred to companies of the González Byass Group and to Pedro Domecq, S.A. de C.V. for the purposes described in this Privacy Policy Under no circumstances will data be transferred to third parties for purposes other than those described in this document.

Rights:

Access, rectify and delete data, as well as other rights. This information is explained in the section "Additional information on data protection".

Additional information:

You can consult additional and detailed information about our Privacy Policy at the point called: "Additional Information on Data Protection".

ADDITIONAL INFORMATION ON DATA PROTECTION

INTRODUCTION:

In this document you will find detailed information regarding the following aspects:

- Who is the owner of this website
- Who is responsible for the processing of your data
- How we collect your personal information
- For what purpose we will process your data
- For how long we will keep them
- What legitimacy do we have in each case
- To which recipients we will communicate your data and possible international transfers
- What rights you have

· Who is the owner of this website?

Identity: GONZALEZ BYASS UK, LTD.

Registration data: 05036529

Postal address: C/O Rayner Essex Llp Tavistock House South, Tavistock Square, London, WC1H 9LG

E-mail address: lopd@gonzalezbyass.es

· Who is responsible for the processing of your personal data?

GONZALEZ BYASS UK, LTD. (hereinafter, "The Company"), is jointly responsible for the processing and therefore, both entities are jointly responsible for processing and protecting your personal data.

Identity: GONZALEZ BYASS UK, LTD., VAT NUMBER: 05036529

Registration data: 05036529

Postal address: C/O Rayner Essex Llp Tavistock House South, Tavistock Square, London, WC1H 9LG

E-mail address: lopd@gonzalezbyass.es

· How do we collect your personal information?

- The Company may collect information about you through different means:

(a) Information that the user provides through the website when you contract a service, make a purchase, make an inquiry, fill out a form, send your C.V. because you are interested in working in the Company, or others. At the time of collecting your data, you will be informed of the identity of the data controller, the purpose of the processing, the recipients and how to exercise your rights.

Generally, the information you provide us with is: name and surname, address, VAT number, date of birth, e-mail address, contact telephone number and payment details. In particular cases, we may also collect personal, academic and professional data.

b) Information collected from the user when browsing the website: when you are browsing our website, the Company obtains limited personal information that allows it to know how the website is used, to improve its performance and to be able to offer a better service to the User. In certain cases, we may show you advertising based on your browsing habits. This information

includes: the protocol address (IP) of your device, the navigation program you use, operating system, date and time of access and information about how you use our website. This information is collected through cookies. For more information, please see our Cookie Policy.

· For what purpose will we process your personal data and for how long will we keep it?

-The company will process your personal information only for specified, explicit and legitimate purposes, and will not be processed in a way that is incompatible with those purposes.

-The following describes the main uses we may make of your personal information:

Purposes

Purpose 1: If you browse the website

Analysis of user behaviour when using the website.

Purpose 2: If you register as a user of the website:

Statistical analysis and market research of website user profiles.

Purpose 3: If you make an enquiry, complaint or request information: Management, study and resolution of queries and complaints made, and provision of the information requested.

Purpose 4: If you make a purchase or contract a service: Accounting, fiscal and administrative management. Conduct satisfaction surveys to improve our products and services. Conduct market research and commercial prospecting, consumer habits reports, statistical data and market trends, in order to offer products and / or services that may be of interest. Fulfillment of legal obligations.

Purpose 5: If you send us your CV: Management of personnel selection processes.

Purpose 6: If you agree to receive communications including news, events, contests and commercial communications about products and services. Keep you informed about products, services, offers, etc..

Purpose 7: If you subscribe to our Newsletter. Sending information about the company, its activity, news of interest, keep you informed about products and services.

Purpose 8: If participating in a promotion or contest. Manage your participation in the Promotion and communicate the result. To process the delivery of the prize. Manage the publicity of the Promotion and its results by any means, which may include the name and image of the winners and, in some cases, of all participants.

Purpose 9: If you register as a member of the wine club. Manage your registration in the wine club. Keep you informed about the club's activities, news of interest, products and services.

Purpose 10: If you expressly consent to your data being transferred to companies of the Gonzalez Byass Group and to Pedro Domecq S.A. de C.V. Transfer your data to the aforementioned companies so that they can:

(a) carry out market research and commercial prospecting, consumer habits reports, statistical analysis and market trends;

b) send you communications about the company, its activity, news of interest, and about products and/or services that may be of interest to you.

The company will keep your personal data as long as necessary according to the information provided and the retention periods set forth in applicable regulations.

• **What is the legitimacy and the purpose for the processing of your data?**

-Legitimate interest of the Company.

If you browse the Web: Analysis on user behavior when using the web.

-Legitimate interest of the Company.

If you register as a user of the website: Statistical analysis and market research of website user profiles.

-Legitimate interest of the Company.

If you contact us to make a query, request information or make a complaint: Management, study and resolution of queries, complaints made through the web.

-User consent | Execution of the contract | Legitimate interest of the undertaking | Legal Obligation.

If you make a purchase or contract the provision of a service: Accounting, fiscal and administrative management. Satisfaction surveys to improve our products and services. Statistical analysis and market research of customer profiles. Conduct market research and commercial prospecting, consumer habits reports, statistical data and market trends, in order to offer products and / or services that may be of interest. Fulfillment of legal obligations.

-User consent | Legitimate interest

If you send us your CV: Personnel selection process management if you send us your CV

-User consent.

If you agree to receive communications including news, events, contests, and commercial communications about products and services: To keep you informed about products, services, offers, etc.

-User consent.

If you subscribe to the Newsletter: Sending of information about the company, its activity, news of interest, keeping you informed about products and services, if you subscribe to the Newsletter.

-Legal obligation | Legitimate interest | Management of the competition or promotion

If you participate in any contest or promotion: Manage your participation in Promotions or contests and communicate the result to you. To process the delivery of the prize. Manage the publicity of the Promotion and its results by any means, which may include the name and image of the winners and, in some cases, of all participants

-User consent

If you expressly consent to the transfer of your data to companies of the González Byass Group and Pedro Domecq S.A. de C.V.: by the aforementioned companies:

a) to carry out market research and commercial prospecting, consumer habits reports, statistical analysis and market trends;

b) to send you communications about the company, its activity, news of interest, and about products and/or services that may be of interest to you.

• **To which recipients will your data be communicated?**

In order to comply with the purposes described in this Privacy Policy, the data may be communicated to companies of the González Byass Group and to third party service providers that provide services to the Company in the ordinary course of its business in general, and in relation to the services provided to the User, such as:

- Providers of technological services: Systems and IT, development and hosting of web pages, data hosting, communications.
- Providers of services related to marketing and advertising
- Consultancy service providers
- Financial institutions

When so required by the legislation in force and in compliance with its obligations on the part of the Company, the data may be communicated to public administrations and authorities.

Only when the User gives his express consent, his data will be communicated to the companies of the González Byass group listed below and to Pedro Domecq S.A. de C.V. (with registered office at Presidente Masaryk 275, Polanco 11560, CIUDAD DE MÉXICO, United States of Mexico, and RFC PDO 170316574, whose main activity is the production and marketing of wines and spirits), who will exclusively use them for the following purposes:

- (a) to conduct market research and commercial prospecting, reports on consumption habits, statistical analysis and market trends;
- b) to send you commercial communications about products and/or services that may be of interest to you.

The companies of the González Byass Group are the following:

- GONZALEZ BYASS, S.A. SPAIN.

Main activity: Winemaking and marketing of wines and spirits. Tio Pepe Festival.

Information: Registered office: Calle Manuel M^a González, 12; 11403 Jerez de la Frontera (Cádiz) NIF A-11605276.

- GONZALEZ BYASS DISTRIBUCION S.L. SPAIN.

Main activity: Marketing of wines and spirits

Information: Registered office: Calle Alcalá, 21, 6^o; 28014 Madrid
NIF B-83631226.

- BODEGA GONZALEZ BYASS JEREZ S.L. SPAIN

Main activity: Winemaking and marketing of wines and spirits

Information: Registered office: Calle Manuel M^a González, 12; 11403 Jerez de la Frontera (Cádiz) NIF B-11916509.

- FINCA CONSTANCIA S.L. SPAIN.

Main activity: Winemaking and marketing

Information: Registered office: Calle Camino del Bravo s/n; 45543 Otero (Toldeo)
NIF: B-45035359

- A. PAZOS DE LUSCO SL. SPAIN.

Main activity: Winemaking and marketing

Information: Registered office: Calle Alxen-Girxo s/n; 36450 Salvaterra de Miño (Pontevedra)
NIF: B-83055418

· CATERING LA BUNGAVILIA S.L. SPAIN.

Main activity: Restaurant services, catering and event organisation

Information: Registered office: Calle Manuel M^a González, 12; 11403 Jerez de la Frontera (Cádiz) NIF: B-11887312.

· DOMINIO FOURNIER S.LU. SPAIN.

Main activity: Winemaking and marketing

Information: Registered office: Finca El pinar, s/n; 09316 Berlangas de Roa (Burgos).
NIF: B-83400358.

BODEGAS BERONIA S.A. SPAIN.

Main activity: Winemaking and marketing

Information: Registered office: Ctra. de Nájera (Km 1.800), 26220 – Ollauri - La Rioja.
NIF:A26012773

VIÑEDOS DEL RIO TAJO, S.L. SPAIN.

Main activity: Winemaking and marketing

Information: Registered office: Finca Daramezas, Carretera CM-4000, KM 8.5, 45160, Guadamur (Toledo). NIF: B45819786

VIÑAS DEL VERO S.A. SPAIN.

Main activity: Winemaking and marketing

Information: Registered office at Ctra. Barbastro a Naval, Km 3,7 -22300 Barbastro (Huesca) y con CIF A50155910

Vin Divino LTD. (dba GONZALEZ BYASS USA). USA.

Main activity: Marketing of wines and spirits

Information: Registered office: 3921 N. Lincoln Ave. 60613 Chicago, Illinois

GONZALEZ BYASS UK LTD. UK.

Main activity: Marketing of wines and spirits

Information: Registered office: c/o Rayner Essex LLP, Tavistock House South, Tavistock Square; WC1H 9LG London. Número de la compañía: 5036529

ALTO DE CASABLANCA S.A. CHILE

Main activity: Winemaking and marketing

Information: Registered office: Ruta 68 Km 66 s/n, Casablanca. Rol Único Tributari.
N° 96.762.990-1

Under no circumstances will data be transferred to third parties for purposes other than those described in this document.

We inform you that, in some cases, some of the recipients of the aforementioned data (service providers or companies of the González Byass Group) may be located outside the European Union. In such a case, your data will be transferred with the appropriate guarantees and keeping the security of your data:

- a) Either because the recipients are located in third countries that have an adequacy decision approved by the European Commission.
- b) Either because the Company has signed Standard Contractual Clauses approved by the Commission with the recipients. https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en

• **What are your rights when you provide us with your data?**

The Company guarantees the exercise of your rights.

To this end, you may contact the Company at its postal address or at the email address provided herein in order to exercise the following rights:

- Right to request access to personal data relating to the data subject.
- Right to request its rectification or deletion.
- Right to request the limitation of their processing.
- Right to object to the processing.
- Right to data portability.

You can request the necessary forms for the exercise of these rights by sending an email to the email address provided in this document.

Given the very personal nature of the exercise of any of these rights, you must attach a copy of your identity card or equivalent supporting document to the request.

You may contact the Spanish Data Protection Agency to obtain additional information about your rights or to file a claim before the same, especially when you have not obtained satisfaction in the exercise of your rights, obtaining all the necessary information for this purpose through the website www.aepd.es