

PRIVACY & COOKIES NOTICE

INTRODUCTION

We are committed to protecting your personal data; your privacy matters to us. That is why we have developed this Privacy and Cookies Notice to explain how we collect, use, share and store your personal information when you use this website, and to inform you about how we will look after that information. This includes any information you may provide us with when you sign up to keep in touch with us or take part in any competitions that we might run.

It is important that you take some time to read and familiarize yourself with this Notice, together with our website terms and conditions and any other privacy or fair processing notices that we may provide on specific occasions when we are collecting or processing personal data about you. This will help you to be fully aware of how and why we are using your information.

If you do not agree with any term in this policy, please do not use the website or submit any personal information to or through it.

All references to “our”, “us”, “we” or “Company” within this policy are deemed to refer to Casa Lumbre, its subsidiaries, affiliates and associates.

1. CHANGES TO THE PRIVACY POLICY

This Privacy Policy was last updated in March 2020; however we keep this policy under review. We will show any updates to it on this webpage. We recommend that you check this page regularly to ensure that you have read the most recent version.

2. THIRD-PARTY LINKS

From time to time this website may include links to third-party websites, plug-ins, platforms and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements or for how they collect and use your personal information. When you leave our website, we strongly advise you to read the privacy notice of every website you visit before you submit any personal information to them.

3. INFORMATION WE COLLECT FROM YOU

Personal data or personal information means any information about an individual from which that person can be identified.

You must not provide us with your personal information if you are not of legal age to purchase alcohol in the jurisdiction in which you reside and (if different) in the jurisdiction in which you are accessing the website(s). We do not intend to collect personal information from any individuals under the legal purchase age, or to market alcoholic beverages to anyone under the legal purchase age. If we receive notice or believe that someone under the legal purchase age has provided us with personal information we will make every reasonable effort to remove such personal information from our files, or to flag such personal information and (to the extent permitted by law) retain it for the sole purpose of ensuring that it is no longer used.

The personal information we collect includes (a) information you provide to us; and (b) information we automatically collect or generate. We have set out below more details about these types of information:

(a) Information you provide to us these types of information might include:

Date of birth (day, month, year)
Zipcode or postal code
Country of residence

(b) Information we generate or automatically collect: these types of personal information may relate to your device (such as your PC, tablet or other mobile device) your use of our websites and apps, photographs and video recordings made by us or on our behalf and / or your personal preferences, interests or geographic location. Examples of these types of information might include:

age (or predicted age range);
information about your device, operating system, browser and IP address;
unique identifiers associated with your device;
details of web pages that you have visited

4. HOW WE COLLECT YOUR INFORMATION

We use different methods to collect your personal data including through direct interaction with you, for example when you:

- visit and use our website;
- contact us with an inquiry or other feedback;
- use the product locator tool; and/or
- communicate with us via social media websites, third party apps or similar technologies

We may also collect your personal data using automated interaction, for example when you browse or use our website, we use cookies and other similar technologies to collect information automatically from your device. Cookies are explained more fully in section 6 below.

5. INFORMATION YOU POST ON PUBLIC AREAS OF OUR SITE AND SOCIAL MEDIA

Information that you post on or through any public areas of the website (such as chat rooms, bulletin boards or discussion forums) and on any social media pages is publicly available information. This means that it is generally accessible to, and may be collected by, others, and may be used by them to send you unsolicited messages. We do not have control over if or how other people may use that information, therefore you should use caution and ensure not to disclose personal information when using public web areas or social media. We will not be responsible for any postings that you make with personal information in them.

6. COOKIES

We use cookies on this website. These allow us to give you the best possible experience on our website.

This section contains information on the following:

WHAT ARE COOKIES?
WHY DO WE USE COOKIES?
WHAT COOKIES DO WE USE?
HOW DO I CONTROL COOKIES?

WHAT ARE COOKIES?

Cookies are small text files that are placed on your computer by websites that you visit. They can't harm your

computer.

If you'd like to read more about cookies, this website contains a lot of useful information that may be of interest: <http://www.aboutcookies.org/default.aspx>

WHY DO WE USE COOKIES?

We use cookies to distinguish you from other users of our website and to provide increased functionality on this site. This helps us improve your experience of the website(s) and to deliver a better and more personalised service.

We don't use cookies to collect personal information about you, but we do use encrypted information gathered from them to also:

- estimate our audience size and usage pattern; and
- recognise you when you return to the website(s).

So that you can make full use of the personalized features on our website(s), your computer, mobile phone or other device that you use to access the internet will need to accept cookies.

HOW DO I CONTROL COOKIES?

You may refuse to accept cookies from us by: (a) not opting in to the use of cookies by us on the landing page of the website(s); or (b) activating the setting on your browser which allows you to refuse the setting of cookies. Each web browser is different so check the 'Help' function of your particular browser to determine how to update your particular cookie settings. The website <http://www.allaboutcookies.org> contains step-by-step guides which can assist you in adjusting your browser settings.

To opt out of being tracked by Google Analytics across all websites visit tools.google.com/dlpage/gaoptout.

Please note that switching off cookies may reduce the functionality of (or prevent access to) certain websites.

7. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to and it is fair for us to do so. Most commonly, we will use your personal data in the following ways:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; For example, this will be the basis upon which we collect information which is necessary for us to understand our markets and consumers, to promote our services and to operate our business effectively.
- Where we need to perform a contract that we are about to enter into, or have entered into with you;
- Where we need to comply with a legal or other regulatory obligation;
- Where you have given us your consent that we do so, for example where you have given your consent to receive marketing or other information from us. Please note, you can withdraw your consent at any time by clicking on the "unsubscribe" link at the bottom of any marketing e-mail we send you.

8. THE PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We use your personal information to:

- manage and improve this website so as to ensure that its content is presented in the most effective manner for you and for your computer and/or device;
- improve our products and services;
- target online advertising;
- authenticate and control access to parts of, or features of, our website (including relative to your age and location);
- enable us to carry out marketing analysis of our products, services and campaigns;
- provide specific services that you request from us, as well as to provide additional services that may be of interest;
- diagnose service or technology problems reported by our users or engineers in connection with the use of our websites.

9. HOW DO WE STORE YOUR PERSONAL INFORMATION?

We will take all steps reasonably necessary to ensure the security of the personal information we collect and store about you. We will use all reasonable endeavours to protect your personal information from unauthorized disclosure and / or access, however unfortunately, the transmission of information via the internet is not completely secure and we have no control over the privacy of any communication while it is in transit to us. Although we will do our best to protect your personal information, we cannot guarantee the security of your information while it is being transmitted to our site. Accordingly, any transmission is at your own risk.

All information you provide to us is stored in secure managed servers and we will limit access to your personal data to those of our employees, agents, contractors and other third parties who have a business need to know.

Where we are legally required to do so, we will notify you and any applicable data protection authority or other regulator should there be an actual or suspected personal data breach involving your personal information.

10. HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only keep 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 obligations that we may have. We will only keep personal data for longer where there is a legal requirement for us to do so.

To determine how long we should keep your information for, we will consider the amount, type, and sensitivity of the personal information involved as well as the potential risk of harm if it is lost, or used or disclosed without authorisation. We will also consider the purposes for which we process your personal data and whether we can achieve those purposes through other means without the need to keep your data.

In some circumstances, we may also anonymize your personal data so that it can no longer be associated with you, for example for statistical purposes. Where we do this, we may use this information indefinitely without further notice to you.

11. OPTING IN

Sometimes, we will give you the option to choose whether you would like to receive information from us or not (e.g. by choosing to opt in to receiving emails from us with news about our brands or promotional offers). However, sometimes we will need to collect information from you by law or you will sometimes not have the option to opt out, such as when we are satisfying the obligations of a contract we have with you, or administering a transaction requested by you [, i.e. if you purchase products from us online]. In some circumstances, if you choose not to provide certain information, we may be unable to provide you with a certain service or product.

12. SHARING YOUR PERSONAL DATA WITH OTHERS

We may share your personal information with any member of our group of companies – this includes any of our subsidiaries, our ultimate holding company and its subsidiaries.

We may disclose your personal information to our suppliers, distributors (wholly or partly owned) and other contractors who are engaged by us to assist in the provision of products and services to you, including delivery of products ordered by you and the conduct of market research which you have agreed to participate in, as well as to other third parties if:

- the third party has been appointed to perform certain functions on our behalf, (for example to administer any competitions, prize draws and promotions we run on this website; or to provide technical services in relation to this website; [or to provide technical or other services in relation to the processing of customer payments and orders;]or to provide technical or other services in relation to the processing of your personal information for mailing or marketing purposes for our products or services, to which you have consented) and it needs access to your personal information to be able to properly perform their function;
- we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation; or to protect the rights, property, or safety of the company, our customers, or consumers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
- we become involved in any merger or acquisition or other transaction involving the sale of all or part of our group companies' business or assets, user information (including the personal information collected from you through your use of this website) may be included in the assets which are transferred to the new owner.

We use only carefully selected third parties to help us deliver our services and products to you and they are only allowed to use your personal information to deliver the services or products you have purchased, registered for or subscribed to. We do not allow them to use your personal data for their own purposes. We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

We will never share any of your personal data with anybody outside of our group of companies for third party mailing or marketing purposes unless we have your consent to do so.

As a global business, we may sometimes need to transfer personal data to another country which is outside of the EEA. Where this is the case and your personal data is affected, we will ensure that an adequate level of protection is in place to protect your personal data.

13. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. This includes the right to:

REQUEST ACCESS TO YOUR PERSONAL DATA

This enables you to receive a copy of the personal data we hold about you and to check that we are processing it lawfully

REQUEST THAT INACCURATE PERSONAL DATA BE CORRECTED

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us

REQUEST THAT YOUR PERSONAL DATA BE ERASED

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for

specific legal reasons which will be notified to you, if applicable, at the time of your request.

OBJECT TO YOUR PERSONAL DATA BEING PROCESSED OR TO REQUEST PROCESSING SHOULD BE RESTRICTED.

RIGHT TO WITHDRAW YOUR CONSENT TO OUR PROCESSING OF YOUR PERSONAL INFORMATION

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

If you wish to exercise any of the rights set out above, or you have any concerns about how we process your information, please e-mail us at DataProtection@abasolowhisky.com so that we can investigate and hopefully resolve your concerns.

If we are unable to satisfactorily deal with your concerns then you have the right to lodge a complaint with the appropriate data protection authority.

14. HOW TO UNSUBSCRIBE OR WITHDRAW YOUR CONSENT

Where we have collected your personal information based on your consent and we have no other lawful basis on which to continue processing your information, if you subsequently withdraw your consent we will delete your personal information.

You can withdraw your consent, change your preferences, or opt out from hearing further from us by letting us know by e-mailing us at DataProtection@abasolowhisky.com.

You can also ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

However please note, where you unsubscribe from receiving e-mailed marketing communications from us, we will keep a note of your e-mail address to make sure that we do not send you further e-mailed marketing communications in future.