

LEGAL INFORMATION ON THE PROCESSING OF PERSONAL DATA

(adapted to GDPR 2016/679)

Who is the Data Controller?

BODEGAS VIVANCO S L Tax ID no. B26023473 Mailing address: CR. Nacional 232 Km 442 26330 Briones, La Rioja. Phone: +34 941322013 Email: protecciondatos@vivancoculturadevino.es hereby notifies you that the personal data that you provide through this website will be processed in accordance with current regulations on personal data protection in Spain.

When the data is collected, its voluntary or required nature will be indicated. A refusal to provide data determined as required will result in the non-provision of or inability to access the service for which such data was requested. Data may also be provided on a voluntary basis in order to ensure the services and/or products offered can be optimally provided.

The data provided by the user must be accurate and truthfully reflect the current situation. The user who enters the data solely and ultimately liable for the veracity of the information provided in our website.

Why do we process the personal data that you provide us?

The main purposes of processing of your personal data are as follows:

We process the information you provide through our website to contact you and respond to your request (the information sent to interested parties will not be considered commercial communication, provided that it aims to maintain the existing relationship between the user and our organisation).

When you request a product and/or service, we process the data you provide us for the provision of the product and/or service requested, for administrative and accounting management purposes and to send you information of interest about our products and/or services.

What is the legitimation for processing your personal data?

- The implementation of pre-contractual measures to respond to your request.
- The performance of a contract to manage the products and services you have, request or contract with us.
- The legitimate interest to be able to inform you about our products and/or services.

How long will we store the personal data?

The data provided will be stored for the time required to respond to your request and manage the products and services that you have requested or contracted, without prejudice to your right to the erasure of your personal data, which will entail the blocking of data during the time that our legal obligations persist, or until you object to continue receiving information about our products and/or services.

In order to comply with legal obligations, we may retain users' data once our relationship with the user has concluded. Accounting and tax documentation for mercantile purposes will be stored for a period of 6 years and for tax purposes for a period of 4 years and health and social records for a term of 5 years.

Automated decision-making and profiling are not being considered. No transfers of data to third countries are being considered.

Who are our Data Processors?

In order to provide you with a suitable service and manage our contractual relationship, we have hired the following categories of data processors who will process your data on behalf of BODEGAS VIVANCO: accounting and tax advisory services, labour consultancy services, auditing and consulting services, administrative services, printing and enveloping services, security services, legal services, computer consulting services, data processing services, data security and cybersecurity services, hosting services, data backup services, providers of other business support activities. Place of provision of services: Spain and, in some cases, the European Union.

What are your rights?

You have the right to obtain information about whether BODEGAS VIVANCO S.L. is processing your personal data (right of access), to request the rectification of inaccurate data (right to rectification) or its erasure when the data is no longer necessary for the performance of the contract (right to erasure), to the limitation, in certain circumstances, of your processing (right to restrict processing), to receiving the personal data provided to you or to request that we send it to another data controller of your choice, in a structured, commonly used and machine readable format (right to data portability), as well as to withdraw at any time the consent given to receive information of interest by any means (right to object). You can exercise your rights by writing to the postal or email address of the Data Controller, in accordance with the provisions of articles 15 through 22 of GDPR 2016/679. To exercise your rights, accompany your request with a copy of your ID or equivalent document proving your identity.

If you believe that the processing of your data infringes applicable personal data protection regulations, you can file a complaint with the competent Supervisory Authority.

Availability of the Data Protection Policy

BODEGAS VIVANCO will provide users with the appropriate technical resources so that, prior to the delivery of personal data, they can access this Data Protection Policy or any other key information, and give their consent so that BODEGAS VIVANCO can proceed to carry out the automatic processing of users' personal data.

Updates and modifications of information

The information in this website was accurate on the date it was last updated. BODEGAS VIVANCO reserves the right to make as many changes and modifications as it deems

appropriate, particularly if it is to adapt to any regulatory changes in the field of data protection in the European Union or Spain, at any time and without prior notice.