

# PRIVACY POLICY

BASIC INFORMATION ON DATA PROTECTION	
Website	<a href="http://www.neyendeapalta.cl">www.neyendeapalta.cl</a> / <a href="http://www.neyendeapalta.com">www.neyendeapalta.com</a>
Website owner	GONZALEZ BYASS, S.A.
Joint Controllers for data processing	GONZALEZ BYASS, S.A. ALTO DE CASABLANCA S.A. (onwards The Company)
Purposes	<p>The Company shall process personal data solely for specific, explicit and legitimate purposes, and the data shall not be processed in any way that is incompatible with those purposes.</p> <p>The Company shall process data primarily in order to manage its recording of website usage, manage purchases, answer inquiries, comply with its legal obligations, improve its services and products, and, at your request, to send you personalised communications.</p>
Legitimation	<p>The Company shall process data only when the following conditions are complied with:</p> <ul style="list-style-type: none"><li>a) You have given your consent to one or several specified purposes</li><li>b) Such processing is necessary for the execution of a contract to which you are a party</li><li>c) Such processing is necessary to comply with the Company's legal obligations</li><li>d) Such processing is necessary to satisfy the legitimate interest of the Company (or of a third party), but only where those interests do not prejudice the interests, rights or fundamental freedoms of the user.</li></ul>
Legal age of consent	By accessing this website, you confirm that you are at least 18 years of age, and therefore you have the necessary legal capacity to give consent to the processing of your personal data in accordance with stipulations set out in the present Privacy Policy and in this website's <b>Terms of Use</b> .
Recipients	<p>To fulfil the purposes described in this Privacy Policy, data may be provided to third parties or to companies within the González Byass Group that provide services to the Company and that are located within the European Union.</p> <p>If the User gives express consent, data may be provided to companies within the González Byass Group and to Pedro Domecq, S.A. de C.V. for the purposes described in this document.</p>
Rights	To access, rectify and erase data, as well as other rights, as explained in our Privacy Policy's additional information
Additional information	You may consult detailed additional information about our Privacy Policy by clicking here

## **ADDITIONAL INFORMATION ON DATA PROTECTION**

### **INTRODUCTION:**

In this document you will find detailed information about the following:

- Who the website owner is.
- Who the party responsible (controller) for processing your data is.
- How we gather your personal data.
- For what purpose we will process your data.
- For how long we will keep your data.
- What lawfulness of processing we have in each case.
- To which recipients we will send your data and possible international data transfers.
- What rights you have.

### **1.1 - WHO IS THE WEBSITE OWNER?**

Identity	ALTO DE CASABLANCA S.A
Registration details	Tax identity number (RUT) N° 96.762.990-1
Post address	Ruta 68 Km 66 s/n, Casablanca (Chile)
Telephone	56322320000

Identity	GONZALEZ BYASS, S.A Tax identity number: A11605276
Registration details	Cádiz Companies Registrar, Book 604, Sheet 56, Page CA-826.
Postal address	Calle Manuel María González (Aptdo. 1710), 12 – 11403 Jerez de la Frontera (Cádiz)
Telephone	(+34) 956357000
Email	lop@gonzalezbyass.es

### **1.2 - WHICH ARE THE PARTIES RESPONSIBLE (JOINT CONTROLLERS) FOR PROCESSING YOUR DATA?**

ALTO DE CASABLANCA S.A. and GONZALEZ BYASS, S.A. (henceforth, jointly “the Company” or “the joint controllers”), are joint controllers for processing your data, and therefore, both companies jointly determine the purposes and means of processing your data.

Identity	ALTO DE CASABLANCA S.A.
Registration details	Tax identity number (RUT) N° 96.762.990-1
Postal address	Ruta 68 Km 66 s/n, Casablanca
Telephone	56322320000

Email	lopd@gonzalezbyass.es
Identity	GONZALEZ BYASS, S.A Tax identity number: A11605276
Registration details	Cádiz Companies Registrar, Book 604, Sheet 56, Page CA-826.
Postal address	Calle Manuel María González (Aptdo. 1710), 12 – 11403 Jerez de la Frontera (Cádiz)
Telephone	(+34) 956357000
Email	lopd@gonzalezbyass.es

### 1.3 – HOW DO WE GATHER YOUR PERSONAL DATA?

- ✓ The Company may collect data on you by the following methods:
  - a) Through information that the User provides through the website when he or she contracts a service, makes a purchase, submits an inquiry, fills out a form, sends a C.V. to express interest in working for the Company, among others. When we collect your data you shall be informed about the identity of the party responsible for processing the data, the purpose for which it is processed, the recipients of the data and the way in which you may exercise your rights.  
In general, the information that you provide us with is: name and surname, residing address, National Tax Identity number, date of birth, email, contact telephone and payment data. In certain cases, we may collect other personal, academic and professional data.
  - b) Through information that is collected from the User as he or she browses the website: when you are browsing our website, the Company obtains limited personal information that allows us to understand how you use the website so that we can improve its performance and provide a better service to the User. In certain cases, we may show you advertising based on your browsing preferences. This information includes: your device's IP address, the browsing programme you use, the operating system, date and time of access and information about how you use our website. This information is collected via cookies. For more information, consult our [\*\*Cookies Policy\*\*](#).

### 1.4 - FOR WHAT PURPOSE DO WE PROCESS YOUR PERSONAL DATA AND FOR HOW LONG DO WE KEEP IT?

- ✓ The Company shall process your data solely for specific, explicit and legitimate purposes and shall not process it in any way that is incompatible with those purposes.
- ✓ We describe below the main uses to which we may put your personal data:

Purposes	
Purposes 1: If you browse the website	Analysis of the behaviour of users as they use the website.
Purpose 2: if you register as a user of the website:	Statistical analysis and market study of user profiles on the website.
Purpose 3: If you submit an inquiry, lodge a complaint or request information:	Management, study, resolving of inquiries and complaints, and provision of requested information.

Purpose 4: if you make a purchase or contract a service	Accounting, tax and administrative management. To carry out customer satisfaction surveys so we can improve our products and services. To carry out market studies and commercial research, produce reports on consumer habits, statistical data and market trends with the aim of offering you products and/or services that may be of interest to you. To comply with legal obligations.
Purpose 5: If you send us your CV	Staff recruitment management.
Purpose 6: If you agree to receive communications, including notifications about news, events, competitions, and advertising about other products and services.	To keep you informed about products, services, special offers, etc.
Purpose 7: If you subscribe to our Newsletter	To send you information about the Company, its activity, news, and to keep you informed about products and services.
Purpose 8: If you participate in a promotion or competition	To manage your participation in the promotion and to notify you of the result. To process the awarding of the prize. To manage the promotion's advertising and its results by any means, and which may include the name and image of the winners and, in some cases, of all the participants.
Purpose 9: If you register as a member of the wine club	To manage your registration in the wine club. To keep you informed about the club's activities, news, products and services.
Purpose 10: If you expressly consent for your data to be provided to companies within the Gonzalez Byass Group and to Pedro Domecq S.A. de C.V.	To provide your data to those companies so that they may: <ul style="list-style-type: none"> <li>a) carry out market studies and commercial research, produce reports on consumer habits and conduct statistical and market trend analysis;</li> <li>b) send you communications about the Company, its activity, news and about its products and/or services that may be of interest to you.</li> </ul>

- ✓ The Company shall keep your personal data for the time necessary according to the information provided and the retention periods allowed under the applicable regulations.

## 1.5 – WHAT IS THE AUTHORISATION FOR DATA PROCESSING?

Lawfulness	Purpose
The Company's legitimate interest	If you browse the website: analysis of user's behaviour while using the website.
The Company's legitimate interest	If you register as a user of the website: statistical analysis and market studies of the website's user profiles.
The Company's legitimate interest	If you contact us to submit an inquiry, request information or to lodge a complaint: management, study and resolution of complaints made through the website.
User's consent Execution of contract The Company's legitimate interest Legal obligation	If you make a purchase or contract a service: accounting, tax and administrative management. To carry out customer satisfaction surveys in order to improve our products and services. Statistical analysis and market studies of customer profiles. To carry out market studies and commercial research, produce reports on consumer habits, statistical data and market trends with the aim of offering you products and/or services that may be of interest to you.
User's consent Legitimate interest	If you send us your CV: staff recruitment management
User's consent	If you agree to receive communications, including notifications about news, events, competitions, and advertising about other products and services: to keep you informed about products, services, special offers, etc.
User's consent	If you subscribe to the Newsletter: to send you information about the Company, its activity, news, and to keep you informed about products and services.
Legal obligation Legitimate interest Management of competition or promotion	If you participate in a promotion or competition: To manage your participation in the promotion and to notify you of the result. To process the awarding of the prize. To manage the promotion's advertising and its results by any means, and which may include the name and image of the winners and, in some cases, of all the participants.
User's consent	If you expressly consent for your data to be provided to companies within the Gonzalez Byass Group and to Pedro Domecq S.A. de C.V.: To provide your data to those companies so that they may:

	<ul style="list-style-type: none"> <li>a) carry out market studies and commercial research, produce reports on consumer habits and conduct statistical and market trend analysis;</li> <li>b) send you communications about the company, its activity, news and about its products and/or services that may be of interest to you.</li> </ul>
--	---

## 1.6 – TO WHICH RECIPIENTS WILL WE SEND YOUR DATA?

- ✓ In order to comply with the Purposes described in this Privacy Policy, your data may be shared with companies within the González Byass Group and with third-party service providers who provide services to the Company in the normal course of business generally and in relation to services provided to the user, such as:
  - . Providers of technological services: systems and IT, development and hosting of websites, data hosting, sending of commercial communications.
  - . Providers of marketing and advertising services.
  - . Providers of advisory services.
  - . Financial bodies.
  
- ✓ In compliance with its legal obligations, the Company may share your data with public authorities and administrations as and when the law requires.
  
- ✓ Only when the User has given express consent, will the data be shared with companies in the González Byass Group listed below and with Pedro Domecq S.A. de C.V. (registered address: Presidente Masaryk 275, Polanco 11560, MEXICO CITY, United States of Mexico, and tax identity number (RFC)/PDO 170316574, whose main activity is the production and marketing of wines and spirits), who will use the data solely for the following Purposes:
  - a) to carry out market studies and commercial research, produce reports on consumer habits and conduct statistical and market trend analysis;
  - b) to send you communications about products and/or services that may be of interest to you.

The companies within the González Byass Group are the following:

Country	Company name	MAIN ACTIVITY	Information
SPAIN	GONZALEZ BYASS, S.A.	Production and marketing of wines and spirits. Tio Pepe Festival	Registered address: Calle Manuel M <sup>a</sup> González, 12 11403 Jerez de la Frontera Cádiz Tax identity number A-11605276
SPAIN	GONZALEZ BYASS DISTRIBUCION S.L	Marketing of wines and spirits.	Registered address: Calle Alcalá, 21, 6 <sup>o</sup> 28014 Madrid Tax identity number B-83631226

SPAIN	BODEGA GONZALEZ BYASS JEREZ S.L	Production and marketing of wines and spirits.	Registered address: Calle Manuel M <sup>a</sup> González, 12, 11403 Jerez de la Frontera Cádiz Tax identity number B-11916509
SPAIN	FINCA CONSTANCIA S.L	Production and marketing of wines.	Registered address: Calle Camino del Bravo s/n, 45543 Otero Toledo Tax identity number B-45035359
SPAIN	A. PAZOS DE LUSCO SL	Production and marketing of wines.	Registered address: Calle Alxen-Girxo s/n; 36450 Salvaterra de Miño Pontevedra Tax identity number B-83055418
SPAIN	CATERING LA BUNGAVILLA S.L	Restaurant and catering services, and event management.	Registered address: Calle Manuel M <sup>a</sup> González, 12, 11403 Jerez de la Frontera Cádiz Tax identity number: B-11887312.
SPAIN	DOMINIO FOURNIER S.LU	Production and marketing of wines.	Registered address: Finca El pinar, s/n, 09316 Berlangas de Roa Burgos Tax identity number: B-83400358.
SPAIN	BODEGAS BERONIA S.A	Production and marketing of wines.	Registered address: Ctra. de Nájera (Km 1.800), 26220 – Ollauri La Rioja Tax identity number: A26012773
SPAIN	VIÑAS DEL VERO S.A	Production and marketing of wines.	Registered address: Ctra. Barbastro a Naval, Km 3.7, 22300 Barbastro Huesca Tax identity number A50155910
UNITED STATES (USA)	GONZALEZ BYASS USA	Production and marketing of wines and spirits.	Registered address: 3921 N. Lincoln Ave. 60613 Chicago, Illinois
UNITED KINGDOM (UK)	GONZALEZ BYASS UK LTD	Production and marketing of wines and spirits.	Registered address: c/o Rayner Essex LLP, Tavistock House South, Tavistock Square London WC1H 9LG

			Company Number 5036529
CHILE	Viñedos Orgánicos Veramonte / Viña Neyen de Apalta ALTO DE CASABLANCA S.A	Production and marketing of wines.	Registered address: Route 68 Km 66 s/n, Casablanca Tax identity number 96.762.990-1

- ✓ Under no circumstances will data be shared with third parties for any purposes other than those described in this document.
- ✓ We inform you that, in some cases, some of the aforementioned recipients of data (service providers or companies in the González Byass Group) could be located outside of the European Union. In that case, your data will be transferred with the appropriate guarantees, maintaining the security of your data:
  - a) If the recipients are located in third countries where the Commission has decided that ensures an adequate level of protection;
  - b) If the recipients are certified under the Privacy Shield <https://www.privacyshield.gov/welcome>
  - c) If the Company has signed contractual clauses with the recipients of the type approved by the European Commission. [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)

## 1.7 – WHAT ARE YOUR RIGHTS WHEN YOU PROVIDE US WITH YOUR DATA?

The Company guarantees the exercise of your rights.

You may contact the Company by post or by email at the addresses provided in this document for the purpose of exercising the following rights:

- ✓ Right to access personal data concerning the interested party
- ✓ Right to request its rectification or erasure
- ✓ Right to request a restriction on its processing
- ✓ Right to oppose processing
- ✓ Right to transfer data

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

Given the highly personal nature of the exercise of these rights, you should attach to your request a copy of your national identity card or equivalent supporting document.

You may contact the Spanish Agency on Data Protection to obtain more information about your rights or to lodge a complaint before it, especially if you have not had satisfaction in the exercise of your rights, having obtained all the information necessary for that purpose via the website [www.agpd.es](http://www.agpd.es)