# **COOKIES POLICY**

#### What is a cookie?

A "cookie" is a small amount of text that is stored in your browser (such as Google's Chrome or Apple's Safari) when you browse most websites.

#### What information does a cookie store?

Cookies do not usually store sensitive information about you, such as credit card or bank details, photographs or personal information, etc. The data they store are of a technical nature, statistics, personal preferences, personalisation of content, etc.

The web server does not associate you as a person but your web browser. In fact, if you usually browse with the Chrome browser and try browsing the same website with the Firefox browser, you will see that the website does not realise that you are the same person because it is actually associating the information with the browser, not the person.

# What types of cookies are there?

- **Technical cookies:** These are the most elementary and allow, among other things, to know when a human or an automated application is browsing, when an anonymous user and a registered user are browsing, basic tasks for the operation of any dynamic website.
- **Analysis cookies:** These collect information on the type of browsing you are doing, the sections you use most, products consulted, time of use, language, etc.
- **Advertising cookies:** These show advertising based on your browsing habits, your country of origin, language, etc.

#### What are first-party and third-party cookies?

First-party cookies are those generated by the website you are visiting and third-party cookies are those generated by external services or providers such as Mailchimp, Mailrelay, Facebook, Twitter, Google adsense, etc.

### Cookies accepted by the regulation and excepted cookies

According to the EU directive, the cookies that require the user's informed consent are analytical cookies and advertising and affiliation cookies, with the exception of technical cookies and those necessary for the operation of the website or the provision of services expressly requested by the user.

#### What cookies does this website use?

This website uses own and third party cookies. The following cookies are used on this website and are detailed below:

#### Own cookies:

**Login:** Login cookies allow you to log in and log out of your roncolibri.com account.

**Personalization:** Cookies help me remember which people or websites you have interacted with, so I can show you related content.

**Preferences:** Cookies allow me to remember your settings and preferences, such as your preferred language and privacy settings.

**Security:** I use cookies to avoid security risks. Mainly to detect when someone is trying to hack into your roncolibri.com account.

### Third party cookies

This website uses analysis services, specifically Google Analytics to help the website analyze how users use the website and improve its usability, but in no case are they associated with data that could identify the user. Google Analytics is a web analytics service provided by Google, Inc. The user can consult <u>here</u> the type of cookies used by Google.

COLIBRI SPIRITS, SLU is a user of the **Instra.com** for supplying and hosting websites, owned by the Instra Corporation, Pty. Inc. For this purpose, the use of such cookies by the systems are never under the control or management of the person responsible for the website, they can change their function at any time, and new cookies can be introduced. These cookies are also not of any benefit to the website operator.

Social network cookies can be stored in your browser while browsing roncolibri.com for example, when you use the button to share content on roncolibri.com on a social network.

Below you have information about the cookies of the social networks used by this website in their own cookie policies:

- Facebook cookies, see more information in their <u>cookie policy</u>.
- Twitter cookies, see more information on their cookie policy.
- Cookies from Instagram, see more information in their cookie policy.
- Youtube cookies, see more information in their cookie policy.

#### Can cookies be deleted?

Yes, and not only delete, but also block, in general or for a specific domain.

To delete cookies from a website you must go to your browser settings and there you can search for those associated with the domain in question and delete them.

- Cookie settings for Google Chrome
- Cookie settings for Apple Safari
- Cookie settings for <u>Internet Explorer</u>
- Cookie settings for Mozilla Firefox

### Acceptance of cookies

If the user continues browsing after having been informed about my Cookies Policy, I understand that he/she accepts the use of cookies.

When you access this website or application for the first time, you will see a warning informing you of the use of cookies and where you can consult this cookie policy. If the user consents to the use of cookies, continues browsing or clicks on any link, it will be understood that they have consented to my cookie policy and, therefore, to the installation of cookies on their computer or device.

In addition to the use of my own cookies, I allow third parties to set and access cookies on your computer. Your consent to the use of these companies' cookies is linked to your browsing of this website.

# PRIVACY POLICY

Your privacy is important to me. In this privacy statement I explain what personal data I collect from my users and how I use it. I encourage you to read these terms carefully before providing your personal data on this website. Those over 14 years of age may register on roncolibri.com as users without the prior consent of their parents or guardians.

In the case of children under 14 years of age, the consent of their parents or guardians is required for the processing of their personal data.

Under no circumstances shall data concerning the professional or financial situation or the privacy of other members of the family be collected from the minor without their consent.

If you are under 14 years of age and have accessed this website without notifying your parents, you should not register as a user.

This website respects and takes care of the personal data of its users. As a user you should know that your rights are guaranteed.

I have strived to create a safe and trustworthy space and that is why I want to share my principles regarding your privacy:

- I never ask for personal information unless it is really necessary to provide you with the services you
  require.
- I never share personal information about my users with anyone, except to comply with the law or with your express permission.
- I never use your personal data for any purpose other than that expressed in this privacy policy.

It should be noted that this Privacy Policy may vary depending on legislative or self-regulatory requirements, so users are advised to visit it periodically. It will be applicable in the event that users decide to fill in any of its contact forms where personal data is collected.

COLIBRI SPIRITS, SLU has adapted this website to the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons (RGPD), Organic Law 3/2018, of 5 December, on the Protection of Personal Data and guarantee of digital rights (LOPDGDD), as well as Law 34/2002, of 11 July, on Information Society Services and Electronic Commerce (LSSICE or LSSI).

For the purposes of the provisions of the aforementioned General Data Protection Regulation, the personal data that you send me through the forms on the website will be treated as "Website users and subscribers" data.

For the processing of my users' data, I implement all the technical and organizational security measures established by current legislation.

# Principles we will apply to your personal information

In processing your personal data, I will apply the following principles that comply with the requirements of the new European data protection regulation:

• **Principle of lawfulness, fairness and transparency:** I will always require your consent to the processing of your personal data for one or more specific purposes that I will inform you of in advance with absolute transparency.

- **Data minimization principle:** I will only request data that are strictly necessary in relation to the purposes for which I require them. As little as possible.
- **Principle of limitation of the storage period:** the data will be kept for no longer than necessary for the purposes of the processing, depending on the purpose, I will inform you of the corresponding storage period, in the case of subscriptions, I will periodically review my lists and delete those records inactive for a considerable time.
- **Principle of integrity and confidentiality:** Your data will be treated in a way that ensures adequate security of personal data and guarantees confidentiality. You should be aware that I take all necessary precautions to prevent unauthorized access or misuse of my users' data by third parties.

How did we get your details?

The personal data that we process in roncolibri.com come from:

- Contact form
- Service request form
- Sales form

What are your rights when you provide me with your data?

Any person has the right to obtain confirmation as to whether or not COLIBRI SPIRITS, SLU is processing personal data concerning me.

Interested persons have the right to:

- Requesting access to personal data relating to the data subject
- Request rectification or deletion
- Request the restriction of their processing
- Oppose treatment
- Request data portability

Data subjects may **access** their personal data, as well as request the **rectification** of inaccurate data or, where appropriate, request its **deletion** when, among other reasons, the data is no longer necessary for the purposes for which it was collected. In certain circumstances, data subjects may request the **limitation of** the processing of their data, in which case I will only keep them for the exercise or defence of claims.

In certain circumstances and for reasons related to their particular situation, data subjects may **object** to the processing of their data. COLIBRI SPIRITS, SLU will stop processing the data, except for compelling legitimate reasons, or the exercise or defence of possible claims. As a data subject, you have the right to receive the personal data concerning you, which you have provided to me and in a structured, commonly used and machine-readable format, and to transmit it to another data controller when:

- The processing is based on consent
- The data have been provided by the person concerned.
- The processing is carried out by automated means.

In exercising your right to data portability, you have the right to have personal data transmitted directly from data controller to data controller where technically feasible.

Data subjects also have the right to effective judicial protection and the right to lodge a complaint with the supervisory authority, in this case the Spanish Data Protection Agency, if they consider that the processing of personal data concerning them is in breach of the Regulation.

### For what purpose do I process your personal data?

When a user connects to this website, for example to comment on a post, send an email to the owner, subscribe or make a contract, they are providing personal information for which COLIBRI SPIRITS, SLU is responsible. This information may include personal data such as your IP address, name, physical address, e-mail address, telephone number and other information. By providing this information, you consent to your information being collected, used, managed and stored by roncolibri.com, only as described in the Legal Notice and this Privacy Policy.

At roncolibri.com there are different systems for capturing personal information and I process the information provided by interested parties for the following purposes for each capture system (forms):

- Contact form: I request the following personal data: Name, Email, to respond to the requirements of users roncolibri.com. For example, I can use these data to respond to your request and respond to questions, complaints, comments or concerns you may have regarding the information included on the web, the services provided through the web, the processing of personal data, questions concerning the legal texts included on the web, as well as any other queries you may have and that are not subject to the terms and conditions. I inform you that the data you provide will be located on the servers of:
  - Ecwid (supplier of COLIBRI SPIRITS, SLU) is located outside the EU in the USA. Ecwid is covered by the EU-US Privacy Shield agreement, whose information is available <u>here</u>, approved by the European Data Protection Committee.
- **Purchase form:** The user has different purchase forms subject to the contracting conditions specified in my particular contracting conditions for each product or service where you will be asked for contact and payment details. I request the following personal data: Name, Email, Address. I inform you that the data you provide will be located on the servers of:
  - Ecwid (supplier of COLIBRI SPIRITS, SLU.), is located outside the EU in the USA. Ecwid is covered by the EU-US Privacy Shield agreement, whose information is available <u>here</u>, approved by the European Data Protection Committee.

There are other purposes for which I process your personal data:

- To ensure compliance with the terms of use and applicable law. This may include the development of tools and algorithms that help this website to ensure the confidentiality of the personal data it collects.
- To support and improve the services offered by this website.
- Other non-identifying data are also collected and obtained through some cookies that are downloaded to the user's computer when browsing this website, which are detailed in the cookies policy.
- To manage social networks. COLIBRI SPIRITS, SLU may have a presence on social networks. The processing of data carried out by people who become followers on social networks of the official pages of roncolibri.com, will be governed by this section. As well as those conditions of use, privacy policies and access regulations that belong to the social network in each case and previously accepted by the user of COLIBRI SPIRITS, SLU It will process your data for the purposes of correctly managing your presence on the social network, informing you of activities, products or services of roncolibri.com. As well as for any other purpose that the regulations of the social networks allow. Under no circumstances will I use the profiles of followers on social networks to send advertising on an individual basis.

In accordance with the provisions of the European General Data Protection Regulation (RGPD) 2016/679, COLIBRI SPIRITS, SLU with address at C/ Ramon Turro 100 6-4. 08005 Barcelona, SPAIN, will be responsible for the processing of data corresponding to Users of the website and subscribers.

COLIBRI SPIRITS, SLU does not sell, rent or transfer personal data that may identify the user, nor will it do so in the future, to third parties without prior consent. However, in some cases, collaborations with other professionals may be carried out, in which case users will be asked for their consent, informing them of the identity of the collaborator and the purpose of the collaboration. I may select and publish client testimonials on our Services, which may contain personally identifiable information, such as your name and/or the city, state or country in which you live. I obtain your consent before posting any testimonials with your name. If such content is posted, it will be

available to other users of the Services. If you would like me to remove or delete your name or testimonial from our website, you can contact roncolibri.com at our contact me.

I may post customer reviews on our Sites or Services, which may contain personally identifiable information, such as your name and/or the city, state or country in which you live. By submitting your review you are giving me permission to post your review on my Sites or Services. If you post such content, it will be available to other users of the Sites or Services. Your posting may also become public and I cannot prevent such information from being used in a way that may violate this Policy or the law. If you would like me to remove your name or review from my Sites or Services, you can contact roncolibri.com at my contact form.

### Legitimation for the processing of your data

The legal basis for the processing of your data is: consent.

Contacting or commenting on this website requires consent to this privacy policy.

The prospective or commercial offer of products and services is based on the consent that is requested from you, without the withdrawal of this consent in any case conditioning the execution of the subscription contract.

Also the contracting of products and services according to the terms and conditions set out in the commercial policy. (put a link to the commercial policy).

Data category

The categories of data processed are identification data.

No specially protected categories of data are processed.

How long will I keep your data?

# The personal data provided will be retained:

• Until requested to be removed by the data subject

To which recipients will your data be communicated?

Many of the tools I use to manage your data are contracted out to third parties.

To provide services strictly necessary for the development of the activity, roncolibri.com, shares data with the following providers under their privacy conditions:

**Google Analytics:** a web analytics service provided by Google, Inc., a Delaware company with headquarters at 1600 Amphitheatre Parkway, Mountain View (California), CA 94043, United States ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help roncolibri.com analyse how users use the website. The information generated by the cookie about your use of roncolibri.com (including your IP address) will be transmitted to and stored by Google on servers in the United States.

**Hosting, Web platform, Email marketing:** Instra Corporation Pty Ltd domiciled in Australia. More information at: https://www.instra.com, processes the data for the purpose of providing hosting, web platform and email services to COLIBRI SPIRITS, SLU

### **Navigation**

When browsing roncolibri.com non-identifiable data may be collected, which may include IP addresses, geographic location (approximately), a record of how the services and sites are used, and other data that cannot be used to identify the user. Non-identifiable data also includes data related to your browsing habits through third party services. This website uses the following third-party analysis services:

- Google analytics
- Facebook Pixel

I use this information to analyse trends, administer the site, track users' movements around the site and to gather demographic information about my user base as a whole.

#### Data secrecy and security

roncolibri.com is committed to the use and processing of personal data included users, respecting their confidentiality and use them in accordance with the purpose of it, and to comply with its obligation to save them and adapt all measures to prevent alteration, loss, treatment or unauthorized access, in accordance with the provisions of current legislation on data protection.

This website includes an SSL certificate. This is a security protocol that makes your data travel in an integral and secure way, that is, the transmission of data between a server and a web user, and in feedback, is fully encrypted or encrypted.

roncolibri.com cannot guarantee the absolute impregnability of the Internet and therefore the violation of data through fraudulent access to them by third parties.

With regard to the confidentiality of processing, COLIBRI SPIRITS, SLU will ensure that any person who is authorised by COLIBRI SPIRITS, SLU to process the customer's data (including its staff, collaborators and service providers), will be under the appropriate obligation of confidentiality (whether a contractual or legal duty).

When a Security Incident occurs, upon becoming aware of it, COLIBRI SPIRITS, SLU shall notify the Customer without undue delay and shall provide timely information related to the Security Incident as it becomes known or when reasonably requested by the Customer.

Accuracy and veracity of the data

As a user, you are solely responsible for the veracity and correctness of the data you send to roncolibri.com exonerating COLIBRI SPIRITS, SLU from any liability in this regard.

Users guarantee and are responsible, in any case, for the accuracy, validity and authenticity of the personal data provided, and undertake to keep them duly updated. The user agrees to provide complete and correct information in the contact or subscription form.

### Acceptance and consent

The user declares to have been informed of the conditions on the protection of personal data, accepting and consenting to the processing of the same by COLIBRI SPIRITS, SLU in the manner and for the purposes indicated in this privacy policy.

# Revocability

The consent given, both for the processing and for the transfer of the data of the interested parties, may be revoked at any time by communicating it to COLIBRI SPIRITS, SLU in the terms established in this Policy for the exercise of rights. This revocation will in no case be retroactive.

# Changes to the privacy policy

COLIBRI SPIRITS, SLU reserves the right to modify this policy to adapt it to new legislation or jurisprudence, as well as to industry practices. In such cases, COLIBRI SPIRITS, SLU will announce on this page the changes introduced reasonably in advance of their implementation.

Policies updated on 25-06-2023.