

CONFIDENTIALITY AND DATA PROTECTION POLICY

We are committed to protecting and respecting your privacy. This Policy sets out the basis on which any personal data that we collect from you, or that you provide us with, are processed on our website.

DEFINITION OF TERMS

In the following:

- **'Personal data'** means "all information about a person whose name is disclosed or data that allows one to identify a person whether directly or indirectly, through an identification number, or through several specific elements", according to the definition provided in the French law (loi informatique et libertés dated January 6th, 1978)
- **'Website'** or **'service'** means the website <http://www.wordofwine.com> as well as all the all web pages it includes.
- **'The Editor'** or **'us'** means Word of Wine, the legal entity or person responsible for the content of the website.
- **'User'** or **'you'** means the person visiting the website and making use of the service offered.

1 - Introduction and role of the confidentiality policy

The objective of this policy is to inform you of our commitment to protect your privacy and the confidentiality of all personal data we record to allow you to benefit from our service.

It is capital for you to read our Privacy Policy and understand the way we use your personal data, as well as the reasons behind their use.

When you sign in on the website, you in fact commit to give us true information at all times. Recording false information directly goes against our Terms and Conditions of Use.

Please note that our Privacy Policy may be updated at any point in time we judge necessary, as to comply with the evolution of the applicable laws, and of the technology we use. We will clearly mention any new update to our users as well as the date of applicability of the updated policy, directly on the website.

These updates will be valid and applicable from the day they are made live, and therefore we encourage all our users to refer to our Privacy Policy regularly so as to be informed of the most recent update.

You will also find in our Privacy Policy a clear description of your rights regarding the protection of all personal data provided, and the protection granted by the laws and regulations in place.

If you have questions regarding our Privacy Policy, or if you feel you need to defend your rights as per Article 10 of this Policy, please contact us sending an e-mail to: lucie@wordofwine.com or a letter to the following address: 15 impasse de l'Hotel de Palerme 84800 L'isle sur la Sorgue (FRANCE)

2 - Data recorded on our website

By using our website, and filling in our electronic forms, you are voluntarily providing personal data that will be processed by us in the manner and for the purposes described in the following.

For some of the specific services offered on our website you may even need provide information to a third party, one of our partners; when their services are specifically required for example when making a payment. We do not have any access to the payment information, this sensitive data must be processed according to its specific nature, governed

by the third party's policy in the strictest confidentiality. We encourage you to read their policy on their website before using their platform to fill in your personal data.

Your IP address (Internet Protocol, a logical numeric address assigned to every single device when it is connected to the internet) is automatically detected and recorded. You are informed through our Cookie Policy that our service is most likely to automatically track your online activity. You can easily avoid this, using your browser settings, as indicated in our Terms and Conditions of use.

The website <http://www.wordofwine.com> is accessible even without providing any personal data. You are under absolutely no obligation to provide any data if you do not feel comfortable doing so. However if you were to not provide all required information, you would not be eligible to benefit from our services fully or would not be able to access part of the information displayed on our website.

We gather, process and use aggregated data such as statistics or demographic data. These, although they are gathered from among your personal data are not directly linked to your identity and therefore are not included in the definition of personal data given by law. For example we are able to aggregate your user data to calculate what percentage of our users have accessed each page of our website. We can therefore focus our efforts and offer services that remain relevant for our users.

in order to provide the best possible services and contents, the website <http://www.wordofwine.com> uses Google Analytics. Google Analytics does not track your use of the internet outside of the boundaries of our website. Google Analytics does not access any of the personal data you have provided on the website, nor can it process these.

None of the data processed on our website are of sensitive nature.

All personal details our Users provide when signing in are kept in compliance with the effective laws and regulations (loi informatique et liberté dated January 6th, 1978). According to said law, our users have a right to access, remove, update or correct the data they have provided. To do so they may place a request using the following e-mail address : lucie@wordofwine.com or place a request in writing and send it to the following address: 15 impasse de l'Hotel de Palerme 84800 L'Isle sur la Sorgue (FRANCE).

To process the personal data of the User, it is not necessary for the Editor to make an official declaration to the French authority for the protection of personal data (Commission Nationale de l'Informatique et des Libertés - CNIL)

3 - Processing your personal data

" Word of Wine as a registered company, is responsible for processing your personal data. The company's main office is registered at 15 impasse de l'hotel de palerme, 84800 L'isle sur la Sorgue (FRANCE)"

4 - Purpose of personal data collection

The mandatory fields on the forms displayed on our website need to be filled with the correct, up to date information. Only then will you benefit fully from the service provided on our website.

- Our website collects and processes the data provided by its users in order to provide the necessary services or the information you subscribed to, such as: We will be in touch to offer you new products, to inform you about the status of your order.
- Our website collects and processes the data provided by its users in order to be able to contact you for a follow up on: in order to contact you for a follow up on your interest in purchasing wine.

5 - Recipients and use of the data collected

The Data collected by us are processed for the purposes of performing the operations on the contents of the Service.

You may receive emails from our Service, including newsletters that you have accepted. You can ask to no longer receive these emails by contacting us at the address lucie@wordofwine.com or clicking the link provided for this purpose in each email that will be sent to you.

Only Word of Wine is the recipient of your Personal data. These are never transmitted to a third party, notwithstanding the subcontractors of Word of Wine. Neither Word of Wine nor the subcontractors make any marketing use of the personal data of the visitors and users of the Service.

Your personal data may be shared with the parties listed below for the purposes set out in this Privacy Policy.

We require that all third parties guarantee the security of your personal data and treat it in accordance with the law. We do not allow our third-party service providers to use your data.

6 - Legal basis for data protection

In compliance with the General Data Protection Regulation (GDPR), Word of Wine does not process your personal data

- unless you have previously given your **explicit consent** ;
- unless a legally enforceable **agreement or contract** was established between Word of Wine and yourselves ;
- unless we need to do so to comply with our **legal obligations** (whether with French or European laws and regulations).

7 - Data security and confidentiality

We take the security and confidentiality of your personal data very seriously. We want to inform you that your personal data may be disclosed to comply with the applicable laws and regulations, with a decision rendered by a statutory or regulatory authority, or in any case where it is necessary for the Editor to do so to protect his own rights and interests.

We use up-to-date data storage and security techniques to protect your personal information from unauthorized access, improper use or disclosure, unauthorized modification, unlawful destruction, or accidental loss. We protect your personal data using encryption protocols.

8 - Storage of personal data: Duration

Your personal data is kept through data hosting. You can find the data hosting details in the Legal Notices of our website. We keep your personal data for only as long as reasonably necessary for the purposes for which it was collected or to comply with any applicable legal reporting or document retention requirements. We will not keep your personal data for a duration exceeding 36 months. After this time, your data will only be used for statistics and will not be processed in any other manner.

9 - Data transfer to a Third party within the EU

Word of Wine has involved a third party to improve the way the data you provided is processed. This third party may be a company registered in a country outside the EU or in a country within the EU. The third will access the data gathered through the forms displayed on the website.

Prior to any agreement, each third party we wanted to work with has provided us with evidence showing they are able to protect the personal data they access using established protocols, thus guaranteeing they meet our standards regarding data protection. We pay special attention to the effective laws and regulations regarding data protection in the country where the third party is registered. Thus, some of the third party we are currently working with comply with the Binding Corporate Rules which are CNIL approved since 2016, and all others comply with both Standards Contractual Clauses and the Privacy Shield.

10 - IT rights and freedom

In compliance with the effective laws and regulations on personal data, you have rights. They are detailed below. Please refer to Article 1 of our privacy policy for details on how to exercise these rights, as a reminder, you can send your request in writing to the following address 15 impasse de l'hotel de palerme 84800 L'isle sur la Sorgue (FRANCE), or contact us via the following e-mail address: lucie@wordofwine.com

Please see the following list of your rights:

- Right to be informed: we must give you informations about the way we are using your personal data (as described in our Privacy Policy)
- Right of accessing your personal data: you have the right to request the access to all the personal data you have provided us with. When you do so, you then receive a copy of all the information you have given us. However to comply with the obligation to protect the confidentiality of such informations, Word of Wine will not disclose these informations before receiving first verifying your identity. We will then need a sufficient proof of ID, such as a copy or a scan of a valid ID document.
- Right of correction: you can request that we amend the data provided if it is incorrect or incomplete. This right also includes any update, or suppression of incorrect or obsolete information.
- Right to delete: also called in French "droit à l'oubli" in some cases you can request that we delete all information provided by you (with the exception of a legal reason for us to decline your request and preserve your data).
- Right to limit data processing: in some cases you can request that we put your data processing on hold for a period of time.
- Right to data portability: You have the right to request a copy of your personal data in a relevant format (such as .csv for example).
- Right to object: you have the right to refuse that we process your personal data (for example you could refuse that we use your data for marketing purposes).

However you can only exercise these right in one of these two situations: if you have a legitimate reason or if you wish to keep your data from being disclosed to a third party for commercial prospection or solicitation purposes.

Please contact us if you feel you need to exercise one of the rights listed above, write a letter and send it to the following address: 15 impasse de l'hotel de palerme 84800 L'isle sur la Sorgue (FRANCE), or contact us via e-mail at lucie@wordofwine.com.

You do not need to pay any fee to access your personal data (or to exercise any of the rights listed above). However we may charge you an appropriate fee if you send us a request clearly unfounded, or repetitive or obviously excessive. In that situation we will have the right to dismiss your request entirely.

Word of Wine, if necessary, will have the right to dismiss any improper request, whether they are excessively repetitive, systematical or simply too numerous.

We may ask you to provide us with specific informations to confirm your identity before granting you access to personal data (or to exercise any other of your rights). It is a way for us to protect your data, so they are not accidentally disclosed to a person who should not have any access to them. We may also contact you after receiving your query, simply to be able to answer it quicker.

We aim to answer all queries within a month as long as they are legitimate. We may answer your query after a period longer than a month if it requires more time and attention, or if you sent multiple or complex requests. In that case we will inform you we need more time and will keep you updated.

11 - Filing a complaint with the data protection authority

If in your opinion Word of Wine is not complying with the effective laws and regulations regarding your personal data, you may file a complaint with the relevant entity. In France, this entity is the CNIL, and you can place your request directly on their website, using the following link: <https://www.cnil.fr/fr/plaintes/internet>.

12 - Cookies policy

During your first connection on the service <http://www.wordofwine.com>, an information about the cookies (and similar technologies) is displayed. This policy presents you dispositions taken to provide you an optimal use of our service. It explains you how to set up your system to accept or refuse the use of these cookies and similar technologies.

a) General information about the cookies on our website

Word of Wine as the editor of the website may decide to use cookies which will be installed on your device (whether you are using a computer, laptop, tablet or smartphone). These cookies will ensure you benefit from a fluid and intuitive navigation on our website.

“Cookies” are small files that allow us to identify your device and therefore to offer you a service tailored to your needs and interest.

The information provided via the cookies will by no means disclose your identity. They are used exclusively by us, with the sole purpose to improve the fluidity of the navigation on our website, while guiding you to a content suited to your main areas of interest. None of this information is disclosed to a third party of any kind except when you have given Word of Wine your explicit consent to do so, or when disclosing this information to comply with a legal requirement, to respond to a court order or another relevant authority or agent legally authorized to receive this information.

To shed some more light on the type of information gathered by the cookies, you may want to refer to the table describing which type of cookies we use. You can find this complementary information on the website, it includes the name of the cookies, their purpose and how long they remain on your device, just follow this link.

b) Define your settings for cookies

You can accept or decline cookie installation at all times.

During your first connection on the website <http://www.wordofwine.com>, a banner containing information about the cookies (and similar technologies) at the bottom of the screen. This banner also warns you that as you carry on Word of Wine’s website, whether you are opening a new page of the website or just clicking on that same page, you are in fact agreeing to the use of these cookies (and similar technologies), they will therefore be installed on your device.

Depending on the type of cookies we may need your explicit consent, or not.

c) Cookies that do not require explicit consent from the user

In compliance with the recommendations provided by The CNIL, some specific cookies do not require your explicit consent to be installed on your device for they are absolutely necessary for the use of our website or to make electronic communication possible. These are for example the cookies that identify the session, those that guarantee authenticity, or balance or cookies that will make your experience on the website more personal. These cookies are of course in compliance with our Privacy Policy as they are brought forward and handled by Word of Wine.

d) Cookies that do require explicit consent from the user

These are mainly cookies brought forward by a third party and they are ‘lasting’ as they remain installed on your device until they expire, or until you uninstall them.

Such cookies do not necessarily comply with our Privacy Policy as they are not brought forward or handled by us, but by a third party. Their use and their settings are therefore in compliance with the third party Privacy Policy, which you can access thanks to the below link. The purpose of this class of cookies is to evaluate the traffic on the website, to generate adverts for which Word of Wine has not signed off, and also cookies that enable sharing on social media (such as Facebook, YouTube, Twitter, LinkedIn...) to which Word of Wine has chosen not to subscribe.

Other cookies are installed to evaluate the traffic on the website, they set up statistics regarding the number of users accessing various pages and contents of our website. These elements in turn have an impact on the improvement of our website on our website <http://www.wordofwine.com> we use tools to evaluate the traffic (Google Analytics). Their Privacy Policy is available by following the below link <https://www.google.com/analytics/learn/privacy.html>

e) Tools and settings of cookies

Most internet browsers' default settings allow the installation of cookies. You are able to personalise these settings to stop the installation of all cookies, or to allow the installation of some cookies and stop others, depending on what entity brought the cookies forward.

CAUTION: We want you to pay special attention to the fact that changing your browser's settings to stop the installation of all cookies on your device will have a negative impact on your experience as a user of our website and may even alter some of the features of our website. If this were to happen, Word of Wine would decline any responsibility in the matter, as the reason for the poor quality of your experience on our website is your refusal to install the suggested cookies or your decision to delete or block them. In these circumstances, you will not receive any compensation.

Your browser also enables you to delete cookies already installed on your device and can notify you when new cookies are ready to be installed. These settings have no negative impact on the quality of your experience on our website, but you are likely to lose an opportunity to benefit from the cookies features.

Please find below several tools at your disposal to personalize your settings. We advise you to have a close look at it.

f) Your internet browser's settings

Each internet browser offers its users its own settings to allow you to deal with cookies. To learn how to intervene and personalize these settings, please click on the relevant link(s) and access the help section made available for your browser;

Google Chrome : <https://support.google.com/chrome/answer/95647?hl=en>

Internet Explorer : <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies#ie=ie-11>

Mozilla Firefox : <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Opera : <https://help.opera.com/en/latest/web-preferences/#cookies>

Safari <https://support.apple.com/en-gb/guide/safari/sfri11471/mac>

For more information about the tools at your disposal to protect your data, and specifically regarding cookies, you may want to consult the following page made available by The CNIL : <https://www.cnil.fr/fr/cookies-les-outils-pour-les-maitriser>.

Please contact us for any complement of information regarding our Privacy Policy, and our use of cookies.

g) List of cookies

You can find a detailed list of all cookies used on the website <http://www.wordofwine.com> following the link if applicable, if not than no link will appear: (no cookies used).

