

GENERAL PRIVACY POLICY

1. WHO IS RESPONSIBLE FOR YOUR DATA?

MIGUEL TORRES S.A., (hereinafter referred to as "TORRES") with registered address at C/ Miquel Torres i Carbó, 6, 08720 Vilafranca del Penedès (Barcelona) and National Tax Identification Code A-0893325.

Similarly, for certain services, your data may be handled by Familia Torres, whereby the following companies act as co-managers:

- Excelsia Vinos and Destilados, S.L.U., with registered address at C/ Magarola, 9, 08720 Vilafranca del Penedès (Barcelona), and holding National Tax Identification Code B-66956517.
- Jean Leon, S.L.U., with registered address at Chateau Leon, s/n, 08775 Torrelavit (Barcelona), and holding National Tax Identification Code B-08271454.
- La Vinoteca Torres, S.L.U., with registered address at C/ Comerç, 22, 08720 Vilafranca del Penedès (Barcelona), and holding National Tax Identification Code B-63768675.
- El Petit Cellar, S.L., with registered address at C/ Barcelona, s/n, 08272 Sant Fruitós del Bages (Barcelona), and holding National Tax Identification Code C.I.F. B-61991550.
- Ribera del Duero, S.L.U., with registered address at C/ Urogallos, 9, 28230 Pinto (Madrid), and holding National Tax Identification Code C.I.F. B-28822443.

In a word, the foregoing companies are considered co-managers of your data. This implies the existence of a contract that enables the transfer of information while at all times complying with the guarantees required by the relevant regulations.

2. FOR WHAT PURPOSE DO WE PROCESS YOUR DATA? AND WHAT ARE THE LEGAL GROUNDS FOR OUR PROCESSING OF YOUR DATA?

We will process any data obtained through the corresponding section of this website, as well as any data that you may provide in the future as part of your relationship with this company, by online and/ or offline means, for the purposes set forth in the informed privacy policy at the time such data are gathered, and where applicable for the purposes set forth by any other specific privacy policies that may be generated.

Moreover, TORRES will process your personal data in keeping with the legal grounds set forth by the European Data Protection Regulations and the Spanish Organic Law on Data Protection and the Guarantee of Digital Rights:

<u>Purpose</u>	<u>Legal grounds</u>
To contact us: <ul style="list-style-type: none">• To process any questions that you send us.	<u>Legitimate Interest</u>
To create an account /To register: <ul style="list-style-type: none">• To process your registration at our website.	<u>Consent</u>

<p>To make a purchase at our Online Shop:</p> <ul style="list-style-type: none"> • To process your purchase. • To process your invoice. • To send your order. • To process the return, where applicable. • To process the service or product requested. • To process any questions or consultations that you may send us. • To facilitate and enable the accounting and administrative processing necessary for customer invoicing. • To process your contracts. • To process the logistical operations related with the transport of goods. • To control fraudulent transactions. 	<p><u>Contractual Relationship / Legitimate Interest</u></p>
<p>Participation in competitions, promotions and prize draws:</p> <ul style="list-style-type: none"> • To process your participation in the competition, promotion or prize draw. • To process the handing over of the prize and any possible tax-related consequences thereof, and to fulfil any legal obligations related with the handing over of such prize. • To be able to contact you in case you are the winner, and to be able to post your name, surname(s) and photo in any activity or promotion of the competition, promotion or prize draw (in any case, be sure to read carefully about how your data will be processed in the terms and conditions of the specific competition, promotion or prize draw). 	<p><u>Consent</u></p>
<p>Attendance to our events and tastings:</p> <ul style="list-style-type: none"> • To process your registration for the event and/or tasting. • To process your attendance, and if necessary, to issue the corresponding access passes. • To process the assignment of image rights, should you authorise us to do so, in accordance with the clause provided. 	<p><u>Consent / Contractual Relationship</u></p>

<ul style="list-style-type: none"> • If you have attended, to enable us to send you information and invitations to our upcoming events. <p>Similarly, if you attend as an “<i>influencer</i>”, “public figure” or “promotor” of the event, we will process your data for the following purposes:</p> <ul style="list-style-type: none"> • To process your admission to the event and/ or tasting, providing the corresponding access pass. • To process the contractual relationship between us. <p>To process the assignment of image rights, should you authorise us to do so, in accordance with the clause provided.</p>	
<p>Experiences:</p> <ul style="list-style-type: none"> • To process your experience. • To process any activities associated with the experience. • To process your attendance, and if necessary, to issue the corresponding access passes. • To process the assignment of image rights, should you authorise us to do so, in accordance with the clause provided. • If you have attended, to enable us to send you information and invitations to our upcoming events. <p>Similarly, if you attend as an “<i>influencer</i>”, “public figure” or “promotor” of the event, we will process your data for the following purposes:</p> <ul style="list-style-type: none"> • To process your admission to the event and/ or tasting, providing the corresponding access pass. • To process the contractual relationship between us. <p>To process the assignment of image rights, should you authorise us to do so, in accordance with the clause provided.</p>	<p><u>Consent</u> / <u>Contractual Relationship</u></p>
<p>Blog/ Question for our experts:</p> <ul style="list-style-type: none"> • To process your publications on the blog and/ or questions for our experts. • To post and reply to any questions you may ask. 	<p><u>Consent</u> <u>Legitimate Interest</u></p>

<p>Mailing of our Newsletter:</p> <ul style="list-style-type: none"> • <u>Informative Newsletter</u>: To process your data in order to send you commercial information and the latest news from TORRES. • <u>Newsletter of the blog</u>: To process your data to send you updates and information related with our informative blog. 	<p><u>Consent</u></p>
<p>Customers that interact with us by means of offline channels:</p> <ul style="list-style-type: none"> • To process the requested service or product. • To process the dispatch of your order. • To process any questions or consultations that you may present to us. • To facilitate and enable the accounting and administrative processing necessary for customer invoicing. • To process your contracts. • To process any logistical operations related with the transport of goods. 	<p><u>Commercial Relationship and/ or existing contract</u></p>
<p>Press office</p> <ul style="list-style-type: none"> • To reply to any questions that you may present to us. • To process your attendance to our informative conferences. • To invite you to events. 	<p><u>Consent</u></p>
<p>Work with us:</p> <ul style="list-style-type: none"> • To process your Curriculum Vitae and motivation letter. • To evaluate your skills for the job. • To process the psycho-technical information of the tests taken during the selection process. • To process and save your application for future calls for applications. 	<p><u>Consent</u></p>
<p>Complaint Channel:</p> <ul style="list-style-type: none"> • Compliance with the code of conduct and business ethics, as a necessary measure to prevent any possible criminal acts by means of the internal complaint system. 	<p><u>Public interest</u></p>

<p>Suppliers:</p> <ul style="list-style-type: none"> • To process any questions that you may send us. • To process your collections and payments. • To process your contracts. • To process your data for compliance. • To process your data to send you personalised commercial information tailored to your preferences and tastes. 	<p><u>Commercial Relationship and/ or existing contract</u></p>
<p>Distributors:</p> <ul style="list-style-type: none"> • To process the requested service or product. • To process any questions that you may send us. • To facilitate and enable the accounting and administrative processing necessary for customer invoicing. • To process your contracts. • To process the logistical operations related with the transport of goods 	<p><u>Consent</u></p>
<p>Logistics:</p> <ul style="list-style-type: none"> • To process the logistical operations related with the transport of goods. 	<p><u>Commercial Relationship and/ or existing contract</u></p>

3. TO WHOM WILL WE DISCLOSE YOUR DATA?

TORRES may disclose your personal data to other companies within Familia Torres, which are described in Section 1 of this Privacy Policy.

Similarly, TORRES may disclose your data to third parties within the framework of the provision of services that require data access and processing. The services provided to TORRES that require access to and the processing of personal data are as follows: financial, tax, accounting, administrative and logistical services, the transport and delivery of goods, and technological, marketing and advertising services. All data disclosure shall always be carried out with the necessary guarantees, in keeping with the data protection regulations in force.

If such third parties process your personal data in places outside of the territory of the European Union, TORRES has entered into the corresponding agreements and has undertaken the relevant security measures and has selected the suppliers included within the Privacy Shield Protocol (in international transfers with the United States), which have adopted the standard data protection clauses adopted by the European Commission, by virtue of Article 46, Paragraph 2 of the General Data Protection Regulation (GDPR) or which are located in countries with data protection measures that have been approved by the European Commission, with the aim of guaranteeing compliance with the GDPR and the security of personal data.

You may, at any time, request further information on the guarantees undertaken in each case, by contacting our Data Protection Officer at dataprotect@torres .

4. WHAT INFORMATION DO WE COLLECT FROM THIRD PARTIES?

Similarly, in cases in which you may register at the website by means of your social media user account, such as Facebook, by using such option, you authorise TORRES to utilise, compile and process such information in accordance with the Privacy Policy of the specific social media used.

Such option is already configured by the social media and is offered as a service to both users and third-party companies, to facilitate registration or access without the user having to enter their data. The data are transmitted from the social media for the purposes specified at each time and in accordance with the corresponding applicable regulations, as well as respecting at all times the configuration that the user has established with them. In any case, we shall duly inform you of the information that we collect from the social media at the time such data are requested.

5. WHAT INFORMATION DO WE COLLECT USING COOKIES?

We use Cookies to process and store information related with the use of the website, enabling us to see the sections visited, to view influence maps, to track user behaviour at the site and to find out at what moment the user leaves the website.

We obtain this information primarily by means of Cookies, meaning that your processing will depend on what Cookies you have accepted.

Remember that you may manage the cookies from our system manager and change your preferences at any time. For further information, including the types of Cookies used and how to set up the Cookies installed on our website, please consult our [Cookies Policy](#).

6. WHEN AND HOW DO WE SEND COMMERCIAL COMMUNICATIONS AND INFORMATION NEWSLETTERS?

If you have given your consent, we may process your data to send you commercial communications and information newsletters primarily, as well as invitations to our events and tastings, and information on our products.

As a user, you undertake to bear in mind that all our communications and newsletters may be personalised in keeping with the interests expressed or according to the products or services that you have purchased or in keeping with any data we may obtain regarding your browsing at our website, through the use of Cookies.

Such personalisation will be carried out partially by automated means.

We remind you that you may revoke your consent at any time and that our newsletters include a link to enable the user to unsubscribe.

7. HOW LONG WILL WE STORE YOUR PERSONAL DATA?

We will store your data for the term set forth in the different privacy policies, after which term, we will keep your data duly blocked in case it may be necessary to fulfil our legal obligations, which may require us to keep certain data for a specific period of time. Moreover, whenever possible, we will store such data anonymously for purposes related with statistics or market studies.

Contact us	We will hold onto your data for 1 year after your consultation has been resolved.
Create an account /Register	Until you cancel your registration as a user.
Make a purchase at our Shop Online	We will keep your data until the conclusion and delivery of your purchase, and for a maximum term of 15 years, unless we are required to keep them for a longer period of time to comply with a legal obligation.
Participation in competitions, promotions and prize draws	We will hold onto your data for 4 years after the conclusion of the competition, promotion and prize draw.
Attendance at our events and tastings	We will hold onto your data for 6 months after the conclusion of the event or tasting. With reference to the receipt of information on our events and tastings, your data will be processed until you cancel your registration or revoke your consent.
Experiences	We will hold onto your data for 2 years after the conclusion of the experience.
Blog/ Ask our experts	We will hold onto your data for 3 years, after which time we will delete your blog publication, unless you want us to keep it posted.
Mailing of our Newsletters	Until you cancel your registration or cancel your subscription to the newsletter.
Customers that interact with us by offline means	For as long as the Commercial Relationship is maintained and/ or the existing contract is valid and up to 15 years after the termination of the relationship with TORRES. In the case of the mailing of commercial information, your data will be stored until you inform us, by any means, that you do not wish to continue to receive information of this nature.
Press office	Until you cancel your registration.
Work with us	1 year as of the evaluation of your candidacy.
Complaints Channel	If you have sent a letter to the TORRES complaints channel, please bear in mind that we will store the information for as long as the corresponding investigation lasts and after such time, we may store such data to make it available to the State Courts and Law Enforcement and Security Forces, as well as

	<p>the relevant authorities in such area, for a maximum of 10 years.</p> <p>If you have any questions, you may contact the DPO, who will provide you with this information.</p>
Suppliers	For as long as the Commercial Relationship is maintained and/ or the existing contract is valid and up to 15 years after the termination of the relationship with TORRES.
Distributors	For as long as the Commercial Relationship is maintained and/ or the existing contract is valid and up to 15 years after the termination of the relationship with TORRES.
Logistics	For as long as the Commercial Relationship is maintained and/ or the existing contract is valid and up to 15 years after the termination of the relationship with TORRES.

8. HOW CAN I EXERCISE MY RIGHTS?

We inform you that if you have registered as a user, you will have the option of editing your data and keeping them up to date in the specific section titled "Edit my profile", which you may access from your user account.

You may exercise your rights to access, rectification, deletion, opposition and limitation regarding the processing and portability of your data and you may revoke your consent to receiving commercial communications or your consent to such personal data processing by writing to C/ Miquel Torres i Carbó, 6, 08720 Vilafranca del Penedès (Barcelona), or by sending an email to the address dataprotect@torres.es, including the subject heading "Personal data". In both cases, you will be required to enclose a photocopy of your identity card or passport.

We inform you that if you do not receive a reply within a reasonable term (2 months), you may file a claim with the Spanish Data Protection Agency.

Moreover, in each mailing with information on our products and services, we will include a link or valid email address to enable you to unsubscribe to such communications.

9. WHAT WILL WE DO IF OUR PRIVACY POLICY IS MODIFIED?

In the event of a change in our privacy policy, we will notify you by email and/ or by posting information on our website, in order to keep you informed of the changes, and to enable you to exercise your rights regarding your personal data, if you deem necessary.

10. HOW CAN I CONTACT THE DPO?

If you have any doubts, questions, queries or complaints regarding the manner in which we process your personal data, you may contact our Corporate Data Protection Officer, via email at dataprotect@torres.es or by sending a written letter to the postal address C/ Miquel Torres i Carbó, 6, 08720 Vilafranca del Penedès (Barcelona), indicating the reference "DPO".

