

## PRIVACY POLICY

<https://diffusionws.com>

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### I. INTRODUCTION & COMMITMENT TO PRIVACY

In compliance with current data protection regulations, Diffusion Wine & Spirits (hereinafter referred to as “the Website”) is committed to implementing the necessary technical and organizational measures to ensure a level of security appropriate to the risks associated with the processing of personal data.

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### II. APPLICABLE LEGISLATION

This Privacy Policy is in accordance with Spanish and European legislation, particularly:

- EU Regulation 2016/679 (General Data Protection Regulation – GDPR)
  - Organic Law 3/2018 on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD)
  - Royal Decree 1720/2007 (regulation developing the previous LOPD)
  - Spanish Law 34/2002 on Information Society Services and Electronic Commerce (LSSI-CE)
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### III. DATA CONTROLLER

**Controller:** FAMILLE PERRIN ESPAÑA SL

**VAT Number:** B42798579

**Commercial Registry:** Gipuzkoa, Volume 2978, Book 52, Page 43303

**Legal Representative:** Akim Simsek

**Postal Address:** Paseo de Bera Bera, 119, 1º

**Phone:** +34 637 37 14 23

**Email:** info@diffusionws.com

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### IV. PERSONAL DATA COLLECTED

Only identifying data is collected. No special categories of personal data are processed (as defined in Article 9 of the GDPR).

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### V. PURPOSE & LEGAL BASIS FOR DATA PROCESSING

**Main purposes:**

- To manage commercial and/or contractual relationships with users.
- To respond to inquiries, forms, or contact requests.
- For statistical, operational, and personalization purposes.
- For market research and continuous improvement of the Website.

**Legal basis:** The user's explicit consent, which may be withdrawn at any time.

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## VI. DATA RETENTION

Personal data will be retained for a maximum period of 18 months or until the user requests its deletion, whichever occurs first.

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## VII. DATA RECIPIENTS

Data may be disclosed to the following recipients:

- IONOS Cloud S.L.U.
- Google Ireland Ltd.
- Transport companies and service providers essential to the operation of the Website.
- Competent legal authorities, when legally required.
- Companies involved in potential merger or acquisition operations.

If international data transfers are required, users will be informed in advance.

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## VIII. MINORS

Only individuals over 14 years of age may provide consent. For those under 14, parental or legal guardian consent is required.

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## IX. SECURITY & CONFIDENTIALITY

The Website uses appropriate technical (such as SSL encryption) and organizational measures to protect the security and confidentiality of personal data.

In the event of a security breach that poses a risk to users' rights or freedoms, the Website will notify the appropriate authorities without undue delay.

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## X. USER RIGHTS

Users have the following rights:

- **Access:** To know whether we process their data and access such data.
- **Rectification:** To request corrections to inaccurate or incomplete data.
- **Erasure:** To request deletion of data ("right to be forgotten").
- **Restriction:** To request limited processing when legally appropriate.
- **Portability:** To request their data in a structured, commonly used, machine-readable format.
- **Objection:** To object to processing under certain conditions.

- **No automated decision-making:** Including profiling.

**How to exercise your rights:**

By written request via postal mail or email, including:

- Full name, ID copy (or similar identification)
- Specific request
- Mailing address for notifications
- Date, signature, and supporting documents if applicable

**Postal address:** Paseo de Bera Bera, 119, 1º

**Email:** [info@diffusionws.com](mailto:info@diffusionws.com)

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## **XI. THIRD-PARTY LINKS**

The Website may include links to third-party websites, each with its own privacy policy. Diffusion Wine & Spirits is not responsible for their data practices or privacy compliance.

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## **XII. COMPLAINTS**

If you believe your personal data is being mishandled or processed in violation of regulations, you may file a complaint with the relevant authority. In Spain:

**Spanish Data Protection Agency (AEPD)** — [www.aepd.es](http://www.aepd.es)