Cookies

Mateos &amp; Garcia Estates S.L. (“M&amp;G Estates”) values the privacy of visitors to our website and

individuals whose personal information we receive through the use of form submissions and other

related services.

This privacy policy explains how we collect personal information on our website, and how we use and

disclose that personal information. This privacy policy also describes our collection and use of personal

information on behalf of our customers (“Clients”) who subscribe to our Customer Identity Management

Platform and related services.

By providing your personal information to our website, you consent to the information handling

practices described in this privacy policy. We encourage you to read the section titled “Your Choices”

below to understand the choices you have with regard to your personal information.

This Privacy Policy also applies to personal information that we collect by other means, which we

combine with personal information collected on our M&amp;G Estates Websites or through the operation

and delivery of our Services.

This Privacy Policy is incorporated into and is subject to the M&amp;G Estates Terms of Service. Any

capitalized terms not defined herein have the meaning set forth in the M&amp;G Estates Terms of Service.

1. Websites Covered

This privacy policy covers the information practices of websites that link to this privacy policy, including,

but not limited to, www.exportwineradar.com, www.exportwineradar.es and www.exportwine.ru

M&amp;G Estates’s websites may contain links to websites operated by third parties. M&amp;G Estates is not

responsible for the privacy practices or the content of such other websites. We encourage you to learn

about such third parties’ privacy and security policies before providing them with personal information.

2. Information We Collect

We collect the following data about users: (1) information that you voluntarily submit to us (“User-

Supplied Information”); (2) technical data automatically collected from all visitors to the M&amp;G Estates

Website (described below under “Passive Data Collection”); (3) information we collect through our

Services; and (4) information we collect from third party sources.

User-Supplied Information

We may collect user-supplied information when you choose to provide us with your Personal

information via the M&amp;G Estates Websites, including when you send us an email asking a question,

register to attend an event, submit a form to receive marketing materials or email newsletters, or

request any research or whitepapers.

Passive Data Collection

Like most web-based services, we automatically receive and record information in on our server logs

from your browser when you use the M&amp;G Estates Websites. We may use a variety of methods,

including clear GIFs or Pixels (also known as “web beacons”) and “cookies”, to collect this information.

We use both session and persistent cookies. The information that we may collect with these automated

methods may include, for example, your IP address, cookie information, a unique device or user ID,

browser type, system type, the content and pages that you access on the M&amp;G Estates Websites, the

frequency and duration of your visits to the M&amp;G Estates Websites, and the “referring URL” (i.e., the

page from which you navigated to the M&amp;G Estates Websites).

We may also use cookies on the M&amp;G Estates Websites to store session validators on your hard drive. If

we directly combine any information gathered through passive means with Personal information, we

treat the combined information as Personal information under this Privacy Policy.

Otherwise, we use information collected by passive means in aggregated forms. For additional

information about the technologies that we use and how they operate, please see our Cookie Policy.

3. Use of Collected Information

We use personal information to establish and enhance our relationship with you. We may use personal

information to operate, provide, improve, and maintain the M&amp;G Estates Websites; to prevent abusive

and fraudulent use of the M&amp;G Estates Websites; to personalize and display content on the M&amp;G

Estates Websites; where permitted by applicable law, to send you information, including via email,

about our products and Services in which we believe you may be interested; to respond to your inquiries

and for other customer service purposes; and for other administrative and internal business purposes.

We may use your e-mail address, including any email address provided at exportwineradar.com or

through the M&amp;G Estates Websites as set forth in the “Communications and Unsolicited Marketing

Communications” section.

On the M&amp;G Estates Websites, we may use passively collected data to: (a) remember your information

so that you will not have to re-enter it during your visit or the next time you visit the M&amp;G Estates

Websites; and (b) monitor aggregate website usage metrics such as total number of visitors and pages

viewed.

4. Disclosure of Collected Information

We do not sell or rent email addresses and other personal information that we collect directly through

the M&amp;G Estates Websites. Please be aware, however, that any information that you voluntarily choose

to display on any publicly available portion of the M&amp;G Estates Websites, or on any Service, becomes

publicly available and may be collected and used by us or others without restriction.

We share your information, including personal information, as follows:

M&amp;G Estates Service Providers

We may provide personal information to third parties for their use in performing internal business

functions (e.g., maintenance, security, data analysis, email transmission, CRM, database management

services, email marketing, surveys, or data hosting) on our behalf. We require such third parties to agree

to only use your personal information in accordance with this Privacy Policy and for no other purpose

than to provide us with necessary services.

Legal Requirements

We may disclose personal information if we have a good-faith belief that doing so is required by a

subpoena or other judicial or administrative order or otherwise required by law.

Additionally, we may disclose personal information where we, in good faith, deem it appropriate or

necessary to prevent violation of the M&amp;G Estates Terms of Service, or our other agreements; take

precautions against liability; protect the rights, property, or safety of M&amp;G Estates, any individual, or the

general public; maintain and protect the security and integrity of our Services or infrastructure; protect

ourselves and our Services from fraudulent, abusive, or unlawful uses; investigate and defend ourselves

against third-party claims or allegations; or assist government enforcement agencies.

Aggregate Information and Non-Identifying Information

We may share aggregated information with Clients, prospective Clients, partners or the press in order to

demonstrate usage of the Service, identify industry and advertising trends, and to generate publicity for

the Company Names Services.

5. Your Choices

On the M&amp;G Estates Websites

You may, as a visitor to our website, choose not to provide us with personal information. You may also,

at any time, access your personal information to update, correct, or delete certain personal information

about you by contacting us at exportwineradar@gmail.com or at the address set forth below in the

“Contact Us” section.

You also have the right to obtain from M&amp;G Estates the erasure of personal data about you in

accordance with applicable data privacy laws. You may exercise your rights with the following requests

concerning your rights on your personal data:

Right to be removed (right to be forgotten):

You are entitled to request deletion of your personal data, like e-mail address. M&amp;G Estates deletes

your personal information at your request, provided we do not have an obligation to store personal data

in accordance with the EU Data Protection Ordinance (GDPR) or other legislation.

Right to Access to your data:

You have the right to confirm whether your data is processed and access your information about how

your data is processed. For example, the purposes of the treatment and the categories of information to

which the treatment applies.

Submit a complaint:

You are entitled to lodge a complaint with a competent regulatory authority (without prejudice to any

other administrative or judicial remedy). Such a complaint is given to the competent supervisory

authority that is the Data Inspection that you access.

Request rectification:

You also have the right to edit or modify any incorrect data, like e-mail address / phone number without

unnecessary delay, as well as providing additional information supplementing incomplete personal data.

Right to data portability:

You are entitled to obtain the personal data relating to you that you have submitted to us in a

structured, widely used and machine-readable format and may transfer them to another personally

responsible person (data portability) when:

(a) The treatment is based on your consent or on an agreement; (b) The treatment is automated.

You are entitled to transfer personal data directly from us to another personally responsible person

when this is technically possible.

In addition you may decide to use your Right to object to treatment and not to opt–in, either when you

first provide M&amp;G Estates with any personal information, to receive marketing information from M&amp;G

Estates about products and Services (including our products and Services and those of third parties).

See also Section 6, “Communications and Unsolicited Marketing Communications”, for additional

information regarding changing your preferences or opting out of receiving marketing information.

Please be aware that even if you update or remove personal information that you have provided to us,

your personal information may be retained in our backup files and archives for a reasonable period for

legal purposes.

6. Communications and Unsolicited Marketing Communications

If you opted in to receive communications from us, including through info@exportwineradar.com, we

may send you administrative messages and updates regarding your account, updates regarding the

M&amp;G Estates Websites, and, where permitted by applicable law, information regarding our offer,

products and Services, including, without, limitation, through social media updates, by email and postal

mail.

If you no longer want to receive commercial email messages, you may indicate your preferences

regarding commercial email messages by taking the steps described in such messages. In addition, you

may indicate your preferences regarding commercial email messages and postal mail messages by

contacting us using the information in the “Contact Us” section below.

7. Client Data

We collect, use, and retain certain information at the direction and on behalf of our Clients/Partners

from individuals (“End Users”) who use the Client/partner website (Client Data) and our M&amp;G Estates

website (e.g. Youtube, Facebook, Twitter and similar).

M&amp;G Estates has no relationship with such End Users whose Client Data we process on behalf of our

Clients. We also do not decide how the Clients use such Client Data. M&amp;G Estates does not access and

use the Client Data, except at directed by our Clients or required by law.

Information Collected Directly Through Use of the Services about End Users:

We collect two types of data about End Users: (1) information that is passed through the Service as a

result of use of the Website and (2) technical data automatically collected from all visitors to pages of

your website that load the Services.

The information that we collect on your behalf depends on the particular Services to which you

subscribe and your preferences. Social network and/or identity providers are hosted by a third party and

on our Client’s service. The Client’s and the End User’s interaction with these features are governed by

the privacy statement of the company providing it.

End User Information:

We maintain no rights to use any End User Personal Information transmitted to us on your behalf

through the M&amp;G Estates Website or received from the social networks, except to make the Services

available to you and/or End User.

We use the information that we collect automatically about the use of our Website to facilitate delivery

of the Service and, in some cases, for internal reports.

Additionally, some of the information collected is used in the Client Reports. The Client Reports may

contain both passively collected information and End User Personal Information.

If you are a customer of one of our Service Partners, and you want to edit or delete any information

captured about you on that Partner website, you should contact the Partner directly.

8. International Users

The M&amp;G Estates Websites are hosted in the European Union, and we may use service providers in the

United States and elsewhere to process personal information on our behalf.

If you use the M&amp;G Estates Websites outside the European Union, please note that your personal data

may be transferred outside of your home jurisdiction to the United States and to other jurisdictions

where our affiliates and service providers are located.

Some of these jurisdictions, including the United States, do not have equivalent data protection laws as

the European Union and other jurisdictions. By using our Websites, you are agreeing that your personal

data may be transferred to the United States and other jurisdictions, as explained in this Section.

For EU residents, see Section 9, “EU and the Privacy Shield” below, for information regarding (i) M&amp;G

Estates participation in the EU-US Privacy Shield Program through its Solution Partnership with Gigya

and (ii) M&amp;G Estates’s handling of Personal information received from the European Union as a

Subprocessor of Clients for its cloud Services.

9. EU, Switzerland and the Data Privacy Shield Framework

M&amp;G Estates complies with the E.U.- U.S. Privacy Shield Framework and the Swiss – U.S. Privacy Shield

Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and

retention of personal information obtained from European Union member countries and Switzerland in

conjunction with its contractual relationship with Gigya.

M&amp;G Estates is a sub-processor for Clients websites that utilize our Services and certifies its processing

of personal information from E.U. member countries and Switzerland is in accordance with the Privacy

Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and

Purpose Limitation, Access, Recourse, Enforcement and Liability (the “Principles”).

You may view the certification for which M&amp;G Estates adheres to through its Solution Partnership with

Gigya here https://www.privacyshield.gov/list.

Gigya and its subsidiaries are subject to the investigatory and enforcement authority of the Federal

Trade Commission.

Information We Process.

We collect, in accordance with the Privacy Shield principles, the categories of information described in

sections 2 and 7 above. We process personal information about website users for the purposes

described in section 3 above.

Please note: additional information about M&amp;G Estates participation in the Privacy Shield program, with

regard to data collected in a capacity as a processor to our Clients, is available by contacting

exportwineradar@gmail.com.

Accessing Personal information.

The Privacy Shield Principles provide individuals located in the E.U. and Switzerland whose personal

information we process with the right to access their personal information in order to review, correct,

amend or delete information processed under the Principles. E.U. and Swiss individuals who use our Site

and would like to access their personal information may contact M&amp;G Estates at

exportwineradar@gmail.com or at the address set forth in the “Contact Us” section.

Additionally, anyone with a registered account on the M&amp;G Estates Websites may, at any time, review,

and update or correct the Personal information in their registration profile by using the tools provided

within this privacy policy to make a request.

E.U. and Swiss End Users whose personal information we process on behalf of a M&amp;G Estates

Client/partner (as a data processor) should first contact the M&amp;G Estates Client/partner, who is the

controller of your personal information, to access their personal information; M&amp;G Estates will work

with its Clients to provide End Users the necessary access about what personal information is processed.

Transfers to Third Parties.

As described in the “Disclosure of Collected Information” section above, we may transfer personal

information from the E.U. and Switzerland to third parties. We contractually require third parties to

whom we transfer personal information to provide the same level of protections as these Principles.

M&amp;G Estates remains responsible for the personal information we receive and transfer under Privacy

Shield as it relates to our Services.

In accordance with our legal obligations, we may also transfer, subject to a lawful request, personal

information to public authorities for law enforcement or national security purposes.

Contacting Us, Complaints and Dispute Resolution.

E.U. and Swiss individuals who have questions or complaints about how we process their personal

information may contact us at exportwineradar@gmail.com. We will work to resolve your issue and

respond no later than 45 days of receipt.

10. Security

The security of your information is important to us, including, but not limited to, the personal

information collected via the M&amp;G Estates Websites and Services. We use reasonable security measures

to protect against the loss, misuse, and alteration of Personal information under our control, both

during the transmission and once we receive it.

This includes, but is not limited to, the use of firewalls and encryption. Although we make good faith

efforts to maintain the security of such personal information, no method of transmission over the

Internet or method of electronic storage, is 100% secure and we cannot guarantee that it will remain

free from unauthorized access, use, disclosure, or alteration.

Further, while we work hard to ensure the integrity and security of our network and systems, we cannot

guarantee that our security measures will prevent “hackers” or other unauthorized persons from

illegally accessing or obtaining this information.

If we learn of a security breach involving your personal information, we may attempt to notify you

electronically so that you can take appropriate protective steps. By using the M&amp;G Estates Websites or

providing personal information to us, you agree that we can communicate with you electronically

regarding security, privacy, and administrative issues relating to your use of the M&amp;G Estates Websites.

If a security systems breach occurs, we may post a notice on our homepage (www.companywebsite.xyz)

or elsewhere on the M&amp;G Estates and may send an email to you at the email address you have provided

to us. Depending on where you live, you may have a legal right to receive notice of a security breach,

involving your personal information, in writing.

This notice paragraph applies to users of the M&amp;G Estates Websites and our Clients who utilize our

Services on their third party websites only. Should there be a breach that affects End Users of Clients;

the Client will be responsible for disseminating notice of such a breach to those End Users.

11. Children

The Children’s Online Privacy Protection Act (“COPPA”) protects the online privacy of children under 13

years of age. M&amp;G Estates Websites are not directed toward individuals under the age of thirteen (13),

and we request that such individuals do not provide personally identifying information through our

websites.

Additionally, we do not knowingly collect or maintain personal information from anyone under the age

of 13, unless or except as permitted by law. If we learn that personal information has been collected

from a user under 13 years of age on or through the M&amp;G Estates Websites, then we will take the

appropriate steps to cause this information to be deleted.

If you are the parent or legal guardian of a child under 13 who has registered on the M&amp;G Estates

Websites or you believe has otherwise provided personal information to M&amp;G Estates, please contact

M&amp;G Estates at exportwineradar@gmail.com to have that child’s account terminated and information

deleted.

12. Analytics

In addition, we use Google Analytics to analyze our users’ use of the M&amp;G Estates Websites. Google

Analytics is currently on company website links list. Google Analytics provides us with aggregated data in

order to help us make informed business decisions. Ultimately, Google, as a third party, controls

information collected through Google Analytics and you should check and be comfortable with its

privacy practices prior to using the M&amp;G Estates Websites. You may review information about Google’s

privacy practices with respect to Google Analytics at https://policies.google.com/

13. Third-Party Ad Networks

We use third parties such as network advertisers to assist us in displaying advertisements on third party

websites, and to evaluate the success of our advertising campaigns. Network advertisers are third

parties that display advertisements based on your visits to our Website as well as other websites. This

enables us, and these third parties, to target advertisements by displaying ads for products and services

in which you might be interested. Third party ad network providers, advertisers, sponsors and/or traffic

measurement services may use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs and

other technologies to measure the effectiveness of their ads and to personalize advertising content to

you. These third party cookies and other technologies are governed by each third party’s specific privacy

policy, not this one. We may provide these third-party advertisers with information about your usage of

our Websites, as well as aggregate information about visitors to our Website.

You may opt-out of many third-party ad networks, including those operated by members of the

Network Advertising Initiative (“NAI”) and the Digital Advertising Alliance (“DAA”). For more information

regarding this practice by NAI members and DAA members, and your choices regarding having this

information used by these companies, including how to opt-out of third-party ad networks operated by

NAI and DAA members, please visit their respective websites:

www.networkadvertising.org/optout\_nonppii.asp (NAI) and www.aboutads.info/choices (DAA).

Opting out of one or more NAI member or DAA member networks (many of which will be the same) only

means that those members no longer will deliver targeted content or ads to you. It does not mean you

will no longer receive any targeted content or ads on our Site or other websites.

You may continue to receive advertisements, for example, based on the particular website that you are

viewing. Also, if your browsers are configured to reject cookies when you visit this opt-out page, or you

subsequently erase your cookies, use a different computer or change web browsers, your NAI or DAA

opt-out may no longer be effective. Additional information is available on NAI’s and DAA’s websites

accessible by the above links.

14. Updates to This Privacy Policy

We may occasionally update this privacy policy. If we do, we will change the “effective date” at the top

of the privacy policy. Before making any update that would make this privacy policy materially less

restrictive in our use or disclosure of personal information collected prior to the update, we will provide

prior notice of the update by posting notice on our website at the top or bottom of the then-current

privacy policy. We encourage you to periodically review this privacy policy to stay informed about our

collection, use, and disclosure of personal information. Your continued use of our websites constitutes

your agreement to our then-current privacy policy.

15. Contact Us

If you have questions about this privacy policy, you may contact us at central@mandgestates.com.

You may also write to us at:

M&amp;G Estates Estates S.L. - Attn: Privacy

Jose Abascal, 58 4 Iz, 28 003

Madrid, Spain