

## **DATA PROTECTION POLICY**

The Management of **DESTILERIAS ALDEA S.L.** (hereinafter, the data controller), assumes maximum responsibility and commitment to the establishment, implementation and maintenance of this Data Protection Policy, guaranteeing the continuous improvement of the data controller with the aim of achieving excellence in relation to compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons with regard to the processing of personal data and the free circulation of these data and therefore which repeals Directive 95/46/EC (General Data Protection Regulation) (OJEU L 119/1, 04-05-2016), and the Spanish regulations on the protection of personal data (Organic Law, legislation specific sector and its development standards).

The Data Protection Policy of **DESTILERIAS ALDEA S.L.** rests on the principle of proactive responsibility, according to which the data controller is responsible for compliance with the regulatory and jurisprudential framework that governs said Policy, and is capable of demonstrating this to the competent control authorities.

In this sense, the data controller will be governed by the following principles that must serve all its staff as a guide and frame of reference in the processing of personal data:

- Data protection by design: the data controller will apply, both at the time of determining the means of processing and at the time of the processing itself, appropriate technical and organizational measures, such as pseudonymization, designed to effectively apply the data protection principles, such as data minimization, and integrating the necessary guarantees in the processing.
- Data protection by default: the controller will apply appropriate technical and organizational measures to ensure that, by default, only the personal data that are necessary for each of the specific purposes of the processing are processed.

- Data protection in the information life cycle: measures that guarantee the protection of personal data will be applicable during the complete information life cycle.
- Lawfulness, loyalty and transparency: personal data will be processed in a lawful, fair and transparent manner in relation to the interested party.
- Limitation of purpose: personal data will be collected for specific, explicit and legitimate purposes, and will not be further processed in a manner incompatible with said purposes.
- Data minimization: personal data will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accuracy: personal data will be accurate and, if necessary, updated; All reasonable measures will be taken to promptly delete or rectify personal data that is inaccurate with respect to the purposes for which it is processed.
- Limitation of the conservation period: personal data will be maintained in a way that allows the identification of the interested parties for no longer than necessary for the purposes of the processing of personal data.
- Integrity and confidentiality: personal data will be treated in such a way as to ensure adequate security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, through the application of measures appropriate technical or organizational
- Information and training: one of the keys to guaranteeing the protection of personal data is the training and information provided to the personnel involved in their processing. During the life cycle of the information, all personnel with access to the data will be appropriately trained and informed about their obligations in relation to compliance with data protection regulations.

The Data Protection Policy of **DESTILERIAS ALDEA S.L.** It is communicated to all the staff of the controller and made available to all interested parties.

Consequently, this Data Protection Policy involves all the staff of the data controller, who must know it and assume it, considering it as their own, with each member being responsible for applying it and verifying the data protection regulations applicable to their activity. , as well as identifying and providing the opportunities for improvement that it considers appropriate with the aim of achieving excellence in relation to its compliance.

This Policy will be reviewed by **DESTILERIAS ALDEA S.L.**, as many times as it is considered necessary, to adapt, at all times, to the current provisions regarding the protection of personal data.