

PRIVACY POLICY AND PROTECTION OF PERSONAL DATA

1.- INTRODUCTION

By entering your personal data, you give your consent to its incorporation into data files belonging to MAHOU, S.A. and CERVECERA INDEPENDIENTE, S.A., both with fiscal residence in Madrid, C/Titan, no. 15, and to AGUAS DE SOLAN DE CABRAS, S.A., with fiscal residence in Beteta (Cuenca), Paraje de Solán de Cabras, s/n (hereinafter denominated jointly as the "**COMPANY**") who are committed to protecting your privacy and therefore place this Policy for Privacy and Protection of Personal Data at your disposition. Your consent shall apply to all of the entities that form the **COMPANY**. If you do not accept the terms of this policy, do not provide your personal data to any of the entities comprising the **COMPANY**. This policy is incorporated in and forms part of the Terms and Conditions that govern the use of the web sites, applications and/or social networking accounts of each of the entities that comprise the **COMPANY** (hereinafter the "Contents" or the "Content").

We recommend that you re-read this policy from time to time, to keep up to date with its contents, including any modifications that may be introduced. When you access the **COMPANY**'s contents after any changes, alterations or updates in the policy have been announced, you implicitly accept the new conditions.

2.- MINORS (PERSONS UNDER 18 YEARS OLD)

The **COMPANY** informs its users that persons under 18 years old may not create user accounts nor access the **COMPANY**'s contents.

Minors must not provide us with any personal data. We may not, and do not wish to, collect personal data of any under-age person, nor offer any promotion, including the promotion of alcoholic beverages, to anyone too young to purchase them. If we are informed, or come to believe, that a minor has provided us with personal data, by falsifying the requirements (giving a false date of birth when accessing the web site), we will do all in our power to eliminate this personal data from our files. Parents or guardians may in any case request the **COMPANY** to block the account of any minor in their charge who may have registered using a false identity.

3.- COLLECTION OF PERSONAL DATA

Any user who wishes to access particular services that require a user account, participate in competitions, raffles, promotions, forums, surveys and other activities of the **COMPANY**, or participate in the services offered by the **COMPANY**, or submit videos, images or other material, receive information on promotions or contact the **COMPANY**, must fill out the forms requesting personal data or comply with the requirement of other means of gaining access to particular services, as applying to the Contents in each case. Notwithstanding the above, precedence shall be given in all cases to the data treatment conditions applying to each case as established and communicated to the user by the corresponding entity within the **COMPANY** at the time that the user filled out the registration forms or surveys or was informed of the rules of a competition or promotion and/or the conditions of particular services. In these cases, the contents of this policy shall be understood as complementary to said conditions (except when they are contradictory, in which case, the particular conditions applying to said promotions/services/competitions shall prevail).

The **COMPANY** does not check the truthfulness of the data provided, and consequently, each case shall be handled on the basis of the data provided by the user, whether or not it be true. The **COMPANY** requests any user whose personal data changes to communicate the changes, in order to keep the user data up to date.

4.- PASSWORD ACCESS

When users wish to participate in games, competitions, raffles, promotions and other services offered by any of the entities that constitute the **COMPANY**, it may be necessary to create a user account, as indicated in each case, and obtain a "user name" and a "password", to identify the user when he/she wishes to participate. Once the user's account has been created, the same user name and password may be used on all platforms. This means that users do not need to create a separate user name and password for each of the Contents of each of the entities that constitute the **COMPANY**; by creating a user account for any Content provided by any of the entities, the user obtains a user name and password that can be used to participate in the games, competitions, raffles, promotions and other services offered by all of the entities that constitute the **COMPANY** in any of their Contents, unless otherwise indicated by one of these entities.

5.- EXISTENCE OF FILES, IDENTIFICATION OF RESPONSIBILITIES, PURPOSES AND CONSENT

When a user creates a user account for any of the Contents of any of the entities that constitute the **COMPANY**, by filling in the registration form, the user accepts the conditions of this policy (thereby declaring that he/she has been freely, consciously, expressly and fully informed) and accepts that the data will be incorporated into the files of personal data on end users created by the entities that constitute the **COMPANY**, whose company names and fiscal residences have been indicated above.

The personal data is processed by the entities that constitute the **COMPANY** in order to maintain and administrate the relationship with the user and for tasks involving information, investigation, statistics, market surveys, training and merchandising, and in order to carry out promotional and advertising activities, including the delivery of commercial information via e-mail or equivalent electronic communications, or by non-electronic means, dealing both with the products, services and activities related to the **COMPANY** and with those of third-parties in the food, hotel & lodgings, entertainment, communications, tourist and travel sectors. In addition, the data provided by users may be used, when appropriate, to manage their participation in specific promotions or competitions (including checking that the user complies with the conditions required in order to receive the prize of the promotion or competition, to deliver or present the prize, or to publish the names of the winners or the prize-winning material in the Contents of the **COMPANY**'s web sites or via other means of communication), to manage their participation in the **COMPANY**'s Contents, and to publish the videos, images or other documents or information that the user decides to provide.

If a user decides to participate in any of the promotions or competitions included in the **COMPANY**'s Contents and wins any of the prizes, a message may be remitted to that user, via the e-mail address provided when filling out the entrance form or, failing this, via text message to his/her cell phone, and regardless of whether the user has accepted or rejected the reception of commercial messages on promotions or prizes, informing him/her of having won the prize, the nature of the prize, the way in which the prize may be received or enjoyed, and with confirmation of the award procedure. Notwithstanding the above, the particular conditions of the competition or promotion in question shall prevail.

At the same time, the user consents to the **COMPANY** using his/her Internet usage data to remit, from the user's Internet browser and/or additional software module to the user's internal messaging address, information and publicity from the **COMPANY**.

If the user subsequently wishes to revoke his/her consent to receiving commercial communications via e-mail or any other similar or equivalent means, he/she may do so via the "Contact us" links in the Contents, when such exist, or by accessing the appropriate link included in each commercial communication. This does not affect the user's rights to access,

rectification, cancellation and opposition concerning personal data, and said rights may be exercised according to the terms of this policy.

Users also consent to the **COMPANY** using their geo-localization data in its shop location service and to calculate shipping costs in on-line shops and to offer personalized services while the user is accessing the Contents.

The user also consents to the **COMPANY** combining all of his/her data for processing, to build user profiles in order to better know the user, for market surveys and to offer services tailored to the user.

Whenever the user sends an e-mail to one of the entities that constitute the **COMPANY**, or communicates in any way that implies the transmission of personal data, the user also indicates free, unequivocal, specific, informed and express consent to the **COMPANY** processing his/her personal data according to the terms of this policy.

Users who wish to may also provide additional data in certain sections of the **COMPANY's** Contents. The provision of said data is exclusively the user's decision. Nevertheless, the **COMPANY** recommends that users do not provide more information than is necessary for the purposes for which they use the services.

6.- DATA CESSION AND COMMUNICATION

Anyone who registers in one of the Contents of the entities that constitute the **COMPANY** grants consent to his/her data being shared between the entities that constitute the **COMPANY** and that are identified above in section 1 of this policy, for the purposes indicated above in section 5.

The **COMPANY** may cede or communicate data, according to the terms of article 11.2.c of the Law of Data Protection (LOPD), to comply with its obligations to public administrative bodies when required to do so by the law in force, and, when required, to other bodies such as the State security forces and the justice system.

If the user does not agree with the cession of data as described above, he/she should abstain from participating in the corresponding service, promotion or competition.

7.- OTHER DATA RECIPIENTS

The **COMPANY** advises the user that it is only responsible for, and only guarantees the confidentiality, security and treatment of data according to the terms of this policy in the case of personal data provided by the user via the **COMPANY's** Contents, and bears no responsibility whatsoever for the treatment and subsequent use of personal data by the **COMPANY's** third-party service providers who may collect said data in the course of their provision of services or of their activity.

In addition, the **COMPANY** accepts no responsibility for data treatment by third parties that set up hyperlinks to the **COMPANY's** Contents, nor by third parties to which the **COMPANY** remits users via hyperlinks in the **COMPANY's** Contents.

The user accepts and consents to his/her data being processed by Salesforce.com, Inc., acting as the **COMPANY's** data processor, and whose fiscal residence is The Landmark at One Market Street, San Francisco, CA 94105, USA. The main purpose of this service is to manage the **COMPANY's** relationships with its users and customers, and to provide a platform for publicity and marketing.

8.- DATA QUALITY

The **COMPANY** advises users that, except in the case of legally constituted and accredited representation, no user may use another person's identity or provide another person's personal data; users may only provide their own personal data and this must be suitable, pertinent, up to date, exact and truthful. In this regard, the user is exclusively responsible for any direct or indirect damages caused to third parties or to the **COMPANY** by his/her use of another person's personal data or by providing false, erroneous, out of date or inappropriate data. Similarly, a user who provides personal data of a third person is obliged to inform the latter according to the terms of article 5.4 of Organic Law 15/1999, dated the 13th of December, on Protection of Data of a Personal Nature ("LOPD", Ley Orgánica de Protección de Datos), which deals with cases in which data is not obtained from the person him/herself, and/or of the consequences of not informing this person or not obtaining his/her consent. Should a user decide voluntarily to provide personal data of another person to the **COMPANY** (for example, an e-mail address or telephone number) with the intention of remitting or recommending the **COMPANY's** Contents, the user undertakes to first inform the other person of the intention of providing his/her data to the **COMPANY** and to obtain that person's consent to the processing of said data and the transmission of communications according to current legislation, failing which, the user is solely responsible.

9.- UPDATING INFORMATION

The user is the only source of persona data, and the **COMPANY** recommends that, in order to maintain the data up to date at all times, according to the principles of the Law of Data Protection ("LOPD"), the user should communicate any modifications in the personal data via the address C/Titan, 15, 28045 Madrid, or by selecting the corresponding option in the "Contact us" section of the Contents, when such exists. We remind users that, in order to update their data, they must prove their identity by providing a photocopy of their Identity Card or equivalent document.

10.- THE RIGHT OF ACCESS, RECTIFICATION, CANCELLATION AND OPPOSITION TO PERSONAL DATA

The **COMPANY** informs users that they have the rights of access, rectification, cancellation and opposition to the treatment of their personal data by means of a signed written request addressed to any of the entities that constitute the **COMPANY** at the following address: Dpto. Asesoría Jurídica, c/ Titán 15, 28045, Madrid. To this end, the user should send said written request, indicating the right he/she wishes to exercise, his/her name and surname, and the address to which the replies should be sent, accompanied by a copy of his/her Identity Card or other valid document as proof of identity (photocopy of passport). In the case of a representative, the right of representation must be demonstrated by a valid document. Users may also exercise their rights by sending a photocopy of both sides of their Identity Card (or of their passport) via the "Contact us" form, when such exists. Because of the centralized manner in which the **COMPANY** handles its data, the use of the right of cancellation of personal data addressed to any of the entities that constitute the **COMPANY** shall also entitle the remaining entities to cancel the data in their own files.

11.- CANCELLING THE PROMOTIONAL E-MAIL SERVICE

The user has the right to oppose the use of his/her data for promotional purposes via the transmission of commercial messages, and to revoke at any time the consent granted for this purpose by simply notifying the entity of the **COMPANY** that he/she does not wish to continue receiving commercial messages, without this affecting the user's right to opposition. Users may communicate their opposition by filling out the corresponding form in the "Contact us" section, when such exists, or in the manner indicated in each commercial message.

12.- "COOKIES"

The owner of this Content informs users that "cookies" may be used when a user accesses the Content. More information regarding our use of "cookies" may be found [here](#).

13.- PROHIBITIONS

With regard to any personal data that is published in the **COMPANY's** Contents, we inform users that this data is part of one or more data files that belong to and are the responsibility of the **COMPANY**, and they may not be freely processed or reproduced by other users of the Contents unless authorisation and informed consent has previously been obtained from the person in question.

Personal data published in the **COMPANY's** Contents may consist of any information on any support that concerns physically-identifiable persons, such as a name, surname, IP address, post code, e-mail address, photographs, images of events and parties celebrated by the **COMPANY**, data identifying prize winners or victors in competitions, promotions or services organised or sponsored by the **COMPANY**, data published by users or any other information. Consequently, any personal data may only be used by the user of the Contents in order to participate in the services and Contents in the way established in the usage policies of the Contents and in the Privacy Policy, for personal purposes and within the framework of current legislation, with no lucrative or commercial objectives of any nature. Any other uses, apart from those indicated above, are expressly forbidden, including the incorporation of images or data into files or processes, and/or the creation of data bases containing personal data and/or sending publicity or cessions to third parties, without the prior informed consent of the corresponding user. The **COMPANY** shall bear no responsibility for the use of personal data that other users of the Contents may make in violation of this policy.

When users participate in the **COMPANY's** activities, competitions or promotions and these involve users of certain Contents contributing any type of file, opinion, etc., the **COMPANY** advises users that the following activities are forbidden:

- Publishing information or making comments or insinuations that incite or promote violence, intolerance, racism, abuse, hatred, menaces, physical or psychological harm, sexual or other harassment or any other acts contrary to law and order;
- Publishing information or making comments or insinuations that are false or deceitful, hurtful, debasing, menacing, offensive, abusive, obscene or defamatory;
- Using information published by another user without respect for the intellectual property rights of the legitimate owners of these rights.
- Using a false identity (impersonating another person, or using the account, user name or password of another person). Users must not give their password to a third person, nor allow a third party to access their account.

Users may only publish information or images belonging to them, and are personally responsible for these. When the information or images affect other persons, the prior express consent of these persons must have been obtained.

Users must always remember that the **COMPANY** is committed to protecting personal honour and privacy. Article seven of Act 1/1982, dated the 5th of May, on Civil Protection of the Right to Honour, Personal and Family Privacy and Personal Image establishes the following acts as illicit and forbidden offences against the person:

- Installation in any location of listening devices, cameras, optical devices or any other means of recording or reproducing a person's private life.

- The use of listening devices, optical devices or any other means to discover a person's private life, manifestations or private correspondence not addressed to those using the aforesaid means, and their recording, copying or reproduction
- Disclosure of events related to a person's or family's private life that affect their reputation or good name, and the revelation or publication of the contents of letters, memoirs or other personal documents of a private nature.
- Revelation of a person's or family's private data obtained via the professional or official activity of the person who reveals the data.
- Capturing, reproducing or publishing a person's image, whether in places or moments corresponding to the person's private life or otherwise, via photographs, filming or any other procedure, except in those cases expressly permitted by law.
- The use of a person's name, voice or image for advertising, commercial or similar purposes.
- Imputation of actions or manifestations of value judgements via actions or expressions that in any way attack anyone's dignity, diminish their good name or threaten their self-esteem.
- The use of a crime by a person condemned by a firm penal sentence to achieve public notoriety or obtain financial benefit, or the divulging of false information on criminal acts, when this is harmful to the dignity of the victims.