



## Privacy Policy.

Below is our **privacy policy** (hereinafter, "**online privacy policy**" o "**policy**") which governs the web platform <http://bertollioliveoil.com/foodle/> (hereinafter, "**the Platform**"), under the ownership of **DEOLEO, S.A.** (hereinafter, "**DEOLEO**" or "**we**"), which is a Company headquartered in Rivas-Vaciamadrid (Madrid), calle Marie Curie, 7, Edificio Beta (Parque Empresarial Rivas Futura), with Tax Identification Number A-48012009, registered in the Business Registry of Cordoba, Tome 2,425, Folio 56, Sheet CO-35003.

**PLEASE DEVOTE A FEW MINUTES TO READING OUR PRIVACY POLICY; IT SHALL NOT TAKE MUCH TIME TO DO SO. WITH THE AFORESAID PRIVACY POLICY, WE WISH TO EXPLAIN SIMPLY, CLEARLY AND TRANSPARENTLY HOW WE PROCESS AND PROTECT YOUR PERSONAL INFORMATION AND RIGHTS. YOUR SECURITY AND THAT OF YOUR PERSONAL DATA ARE OF PARAMOUNT IMPORTANCE TO DEOLEO AND WE TAKE THEIR PROTECTION MOST SERIOUSLY.**

### **1. TO WHOM DOES THIS POLICY APPLY TO?**

This policy is applicable to **all platform users**, regardless of whether they are DEOLEO customers or not, (hereinafter, and indiscriminately, "**user**" or "**users**") who are considered natural persons. As such, when referring to personal data, we refer to all types of information concerning an identified or identifiable natural person.

If you are already a DEOLEO customer, and have signed a contract with us, you must also refer to the information regarding our specific Terms of Privacy contained therein.

### **2. IF YOU NAVIGATE OR USE OUR WEB PLATFORM, WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?**

We are your personal data processing controllers, namely:

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**Full name of the Company:** DEOLEO, S.A.

**Registered Office:** Ctra. N-IV, Km 388, Alcolea (Cordoba)

**Physical location/headquarters:** Calle Marie Curie, 7, Edificio Beta (Parque Empresarial Rivas Futura), 28521, Rivas-Vaciamadrid (Madrid)

**(General) email address:** [rgpd@deoleo.com](mailto:rgpd@deoleo.com)

Please send any issue relating to the protection of your personal information to the following email address: [rgpd@deoleo.com](mailto:rgpd@deoleo.com)

### **3. WHAT TYPE OF DATA DO WE PROCESS?**

The **processing of your data is necessary as it enables you to have access to the contents and/or features of the Platform or to be sent information or to be provided with the services arranged therein, should you so require it.** In this regard, we maintain a **firm commitment to processing your personal data in a legitimate and consistent manner, pursuant to the principles and legal obligations outlined in current Personal Data Protection Provisions**

**When you browse our platform and, more specifically, when you interact or register with us, you provide us with data directly;** for example, when you fill in any type of form or request online, pursuant to the processing purposes indicated in each case (registration forms, question forms, investor profile forms, subscription to our blog, access to the customer area, etc.).

The type of data that you provide us with shall always be processed through the relevant forms or requests provided on the platform and, additionally, may vary depending on the type of form or application in question. Without prejudice to the above, through the platform, and the different forms and applications contained therein, different categories of personal data may be collected, although we shall always ask for the appropriate; relevant and necessary data, pursuant to the aforesaid processing purposes (Personal Data Minimisation Principle):

- **Personal identification data** (name and surnames);
- **Personal contact information** (telephone or personal mobile, email);
- **Data on personal characteristics** (investor profile, needs or doubts associated, for example, indicated through our chat, etc.).



Similarly, when you browse our platform you should be aware of the cookies that are installed on your data terminal or device, since this involves the processing of your personal data, pursuant to the classification of cookies reported and their specific purposes (see our [Cookies Policy](#)). Should you accept our cookies policy, analytical cookies shall be used; these cookies process the **personal data associated with your browsing profile** for analytical and/or statistical purposes. We would like to emphasise that if you continue to browse our platform with an awareness of the existing information regarding our personal data processing legal policies, it is understood that you unequivocally accept the cookies that we use, although you can, at any time, configure the use of such analytical cookies, as indicated in the aforesaid Cookies Policy.

#### **4. WHAT DO WE USE YOUR DATA FOR?**

**The personal data that you provide us with shall be processed for the specific means outlined within this Privacy Policy and, where appropriate, in the different data forms provided therein.** In this regard, data collection serves the following processing purposes:

- **Making it possible for you to browse our platform**, thereby allowing you access to the information and content contained therein;
- **Addressing your requests or claims**, according to the forms or claims you send to us;
- **Clarifying your doubts** about our services **in a streamlined and efficient way**, via the different channels available for this purpose (email, telephone, chat, etc.);
- **Allowing and managing your user registration**, should you so require it. You can unsubscribe from such registration, whenever you deem fit, by writing to [rgpd@deoleo.com](mailto:rgpd@deoleo.com).
- **Allowing uses associated with the cookies of the Platform**, as described in our [Cookies Policy](#);
- Should you accept our Cookies Policy, you thus accept that you are subject to the purposes associated with the different cookies outlined therein; more specifically, analytical cookies (browsing profile/user cookies); the aforesaid cookies **carry out web browsing analysis and statistics in order to improve our services and the quality thereof**. You can configure the use of analytical cookies at any time, should you so wish, as you hold the right to withdraw your consent regarding the purposes associated with these cookies. We inform you that the withdrawal of your consent of the processing of your personal data, with regard to specific types of cookies, such as session or technical cookies, may prevent you from browsing our platform (see our [Cookies Policy](#));
- **Establishing as many applicable protection measures as possible, pursuant to the legal provisions currently in force**, including the potential anonymisation of your personal data, which is done by

applying the appropriate techniques available to this end. Therefore, in the event, the anonymisation and pseudonymisation processes can also be carried out in order to provide the highest-level of personal data protection;

- **Applying the relevant security, technical and/or organisational measures to your personal data, with a view to prevent existing risks at any time, including the pseudonymisation or encryption of your personal data through our platform.**

**5. WHAT BASIS DO WE HAVE TO PROCESS YOUR PERSONAL DATA LEGITIMATELY?**

<b><i>Processing purposes</i></b>	<b><i>Legitimate processing basis</i></b>
<b>Make it possible for you to browse our platform, thereby allowing you access to the information and content contained therein.</b>	Your consent and, as the case may be, satisfaction of a legitimate interest, be it our own or of third parties, associated with the adequate management, maintenance, carrying out and evolution of the platform, its tools, network and associated information systems, which enabling proper functioning thereof, as well as the features contained therein, access to its content and services, and the general security of all the aforesaid.
<b>Address the requests or claims, according to the forms or claims you send to us;</b>	Your consent.
<b>Solve your doubts about our services in a streamlined and efficient way</b>	Your consent and, as the case may be, the carrying out of pre-contractual measures at the request of the user/interested party.
<b>Allow and manage your registration as a user, should you require it.</b>	Your consent.
<b>Should you accept our Cookies Policy, provided for this purpose, you thus accept the processing procedures associated therewith to be carried out and, thus, agree to the carrying out of the relevant analysis derived from your web browsing for analytical and/or statistical purposes.</b>	Your consent.
<b>Establish as many applicable</b>	Compliance with the legal obligations set forth in REGULATION (EU) 2016/679, of

<p><b>protection measures as possible, pursuant to the legal provisions currently in force, including the pseudonymisation or anomysation of your personal data through our platform</b></p>	<p>the European Parliament and of the Council, of 27<sup>th</sup> April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter, "<i>General Data Protection Regulation</i>" or "<i>GDPR</i>") <a href="https://www.boe.es/doue/2016/119/L00001-00088.pdf">https://www.boe.es/doue/2016/119/L00001-00088.pdf</a>. In the case of processing data designed to guarantee the protection of the platform, the web, and information systems associated therewith, where appropriate, this is done in order to satisfy the legitimate interests of DEOLEO or, where appropriate, of a third party (Recital 49 of the GDPR).</p>
<p><b>Apply the relevant security, technical and / or organisational measures on your personal data with a focus on the existing risk at each moment</b></p>	<p>Compliance with the legal obligations set forth in REGULATION (EU) 2016/679, of the European Parliament and of the Council, of 27<sup>th</sup> April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter, "<i>General Data Protection Regulation</i>" or "<i>GDPR</i>") <a href="https://www.boe.es/doue/2016/119/L00001-00088.pdf">https://www.boe.es/doue/2016/119/L00001-00088.pdf</a>. In the case of processing data to guarantee the protection of the platform, the web, and information systems associated therewith, where appropriate, this is done in order to satisfy the legitimate interests of DEOLEO or, where appropriate, of a third party (Recital 49 of the GDPR).</p>

When you give consent for your personal data to be processed, with the aforesaid legitimate processing basis, we remind you that you have the right to revoke your consent at any time, free of charge, by simply sending an email to [rgpd@deoleo.com](mailto:rgpd@deoleo.com).

**6. HOW LONG ARE YOUR PERSONAL DATA STORED?**

<i>Personal data associated with the processing purposes reported</i>	<i>Personal Data storage periods or criteria</i>
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<p><b>Data associated with the user's navigation through our platform</b></p>	<p>-Generally, your data shall be kept, in this instance, for the amount of time necessary to enable you to correctly navigate, and make use of, our web platform and the contents laid out therein, which you have access to;</p> <p>-With regard to the data associated with your browsing profile, and specifically to analytical cookies, whose use you have accepted and is outlined in the DEOLEO Cookie Policy, please refer to the section related to the permanence of these cookies (see our <a href="#">Cookies Policy</a>).</p>
<p><b>Address requests or claims according to the forms or claims you send us.</b></p>	<p>-The amount of time required to correctly respond to your requests and/or specific claims according to each case.</p>
<p><b>Solve your doubts about our services in a streamlined and efficient way</b></p>	<p>-The amount of time that is strictly required to resolve or process the aforementioned requests and/or specific claims.</p>
<p><b>Allow and manage your registration as a user if you require it.</b></p>	<p>-Until you request the effective withdrawal of your registration. If you are a DEOLEO customer, the personal data retention periods described in these cases may be applied as indicated below.</p>
<p><b>Establish as many measures of protection are applicable in accordance with current legal provisions.</b></p>	<p>The user's personal data are processed, including the storage of such data for the legal terms set out regardless of the legitimate processing basis for DEOLEO.</p>
<p><b>Apply relevant security, technical and/or organisational measures to your personal data, with a view to prevent existing risks at any time.</b></p>	<p>The user's personal data are processed, including the storage of such data during the legal terms outlined, regardless of the legitimate processing basis for DEOLEO uses.</p>

In any case, and notwithstanding the foregoing, the user is also informed of the following:

- Pursuant to current Personal Data Protection Legal Provisions, in any matter concerning the correct processing of personal information by DEOLEO, the Company may also securely store this information for three years from its collection (prescription period for breaches in this sphere);
- Regarding the storage time of cookies, the user is advised to consult our [Cookies Policy](#) (see the section regarding the permanence of cookies);

- In general, when the personal data are no longer necessary for the processing purposes that they were collected for, the aforesaid data shall be blocked, and shall only remain available to the competent authorities responsible for the possible determination of legal responsibilities during the processing thereof, always pursuant to the applicable legal provisions and the aforesaid data cannot be used for any other purposes. After the corresponding legal deadlines have elapsed, in case of data blockage, the relevant personal data shall be erased pursuant to the applicable legal provisions, and may also, if applicable, be securely anonymised by DEOLEO (anonymised/non-personal data).

#### ***7. WHAT CONSEQUENCES SHALL ENSUE IF YOU DO NOT PROVIDE US WITH YOUR PERSONAL DATA?***

We try to request or use the minimum amount of essential information when processing personal data, as may be necessary to carry out the purposes of our Corporate object and purposes. All this pursuant to the applicable legal provisions.

However, if you fail to provide your personal data this could lead to the impossibility to: 1) use our website properly (non-acceptance of technical or session cookies); 2) access certain content or services; 3) process your requests or specific claims (for example, due to the lack of information or insufficient completion of the corresponding form or application).

The information and personal data that you provide, according to each case, must be in any event:

- Sufficient, although adjusted, limited and proportionate to the legitimate purposes of processing reported in each case, with the utmost respect for the principles of purpose limitations and of minimisation of personal data;
- Accurate, up-to-date and truthful, in order to be able to adequately verify the identity, legal capacity and, where appropriate, representation, as well as being able to adapt, in each case, the data processing tailoring it to your specific needs and your current situation. This is done pursuant to principles of personal data accuracy.

Users shall be fully responsible for all data and personal information that they provide to the Client, within the platform and, where appropriate, for demanded or contracted services.

#### ***8. DO WE SHARE YOUR PERSONAL DATA WITH THIRD PARTIES?***



In general, we neither sell, offer nor share your data with third parties.

Similarly, it is possible that certain third parties can access your personal information when carrying out the services they provide to DEOLEO. For example, in the case of third party cookies that are applied in the platform (see our [Cookies Policy](#)).

DEOLEO has several personal data processors under its supervision, and, acting as trusted providers, they are allowed access to the aforesaid data only on strictly need- to know basis for the provision of the services contracted with them. Such data processors operate under a service contract that complies with the terms, conditions and guarantees set forth in Article 28 of the GDPR, with DEOLEO carrying out the controls, inspections and corresponding audits in this area to verify that the aforesaid processors strictly comply with the contracts signed to this end, and with the applicable legal provisions.

**9. ARE INTERNATIONAL TRANSFERS CARRIED OUT WITH YOUR PERSONAL DATA?**

We inform you that, in general, international transfers of your personal data are not expected, and DEOLEO uses the necessary measures and guarantees in this area with pursuance to the current Personal Data Protection legal provisions.

Notwithstanding the foregoing, our Cookies Policy informs you of possible international transfers of personal data, pursuant to the services provided by certain companies (third-party cookies). All international transfers are fully guaranteed pursuant to the applicable legal provisions, since these are Companies included in the list of Companies Certified under the Privacy Shield (see our [Cookies Policy](#)).

**10. WHAT RIGHTS DO YOU HAVE, WHAT DO THEY MEAN AND HOW CAN YOU EXERCISE THEM?**

<b><i>Your rights</i></b>	<b><i>What does it mean?</i></b>	<b><i>How can it be exercised?</i></b>
<b>Right of information</b>	The right to be provided by DEOLEO with appropriate information, both when your personal data have been collected (whether obtained from you or	DEOLEO seeks to provide you with all the necessary information regarding the processing of your personal data pursuant to Articles 12 to 14 of the



	through a third party), or later regarding the processing of your personal data. You decide on your personal information. Refer to Articles 12 to 14 of the GDPR.	GDPR. However, if you have any question or doubt about our privacy policies and cookies, please do not hesitate to write to us, via: <a href="mailto:rgpd@deoleo.com">rgpd@deoleo.com</a> and we shall address your additional request for information.
<b>Right of access</b>	The right to obtain from DEOLEO confirmation of whether or not your personal data are being processed, and basic information related to such processing (Article 15 of the GDPR), as well as to obtain a copy of the personal data that are being processed.	Address a communication in writing via email to <a href="mailto:rgpd@deoleo.com">rgpd@deoleo.com</a> with the Ref. "Exercising of Rights" accompanying the email your registration email and, if necessary, to prove your identity, including a copy of your national identity document or equivalent identification document (passport, NIE etc.).
<b>Right of rectification</b>	Right to obtain the rectification of your personal data, without delay, by DEOLEO pursuant to Article 16 of the GDPR.	Address a communication in writing via email <a href="mailto:rgpd@deoleo.com">rgpd@deoleo.com</a> with the Ref. "Exercising of Rights" accompanying the email your registration email and, if necessary, to proving your identity, including a copy of your national identity document or equivalent identification document (passport, NIE, etc.).
<b>Right of erasure</b>	Right to obtain the erasure of your personal data, without undue delay, by DEOLEO pursuant to the terms of Article 17 of the GDPR.	Address a communication in writing via email <a href="mailto:rgpd@deoleo.com">rgpd@deoleo.com</a> with the Ref. "Exercising of Rights" accompanying the email your registration email and, if necessary, to proving your identity, including a copy of your national

		identity document or equivalent identification document (passport, NIE, etc.).
<b>Right to limitation of processing</b>	<p>The right to secure the limitation of the processing of your data from DEOLEO, if:</p> <ul style="list-style-type: none"> <li>- The accuracy of your personal data is affected, during a period that allows DEOLEO to verify their accuracy.</li> <li>-The processing of your personal data is unlawful and you object to their suppression (and instead, request the limitation thereof).</li> <li>-DEOLEO no longer needs your personal information, but you need it in order to formulate, carry out or defend a claim.</li> </ul> <p>The carrying out thereof shall be limited to what is outlined in Article 18 of the GDPR.</p>	<p>Address a communication in writing via email <a href="mailto:rgpd@deoleo.com">rgpd@deoleo.com</a> with the Ref. "Exercising of Rights" accompanying the email your registration email and, if necessary, to proving your identity, including a copy of your national identity document or equivalent identification document (passport, NIE, etc.).</p>
<b>Right to data portability</b>	<p>Right to receive any personal data referring to you and which you have provided us in a structured format, for common use and systematic reading, or to transmit them to another controller when technically possible pursuant to the provisions of Article 20 of the GDPR.</p>	<p>Address a communication in writing via email <a href="mailto:rgpd@deoleo.com">rgpd@deoleo.com</a> with the Ref. "Exercising of Rights" accompanying the email your registration email and, if necessary, to proving your identity, including a copy of your national identity document or equivalent identification document (passport, NIE, etc.).</p>
<b>Right of objection</b>	<p>Right to object to, at any time, the processing of your personal data,</p>	<p>Address a communication in writing via email</p>

	including profiling, if this is based on the satisfaction of the legitimate interest of DEOLEO or a third party as described under Article 21 of the GDPR.	<a href="mailto:rgpd@deoleo.com">rgpd@deoleo.com</a> with the Ref. "Exercising of Rights" accompanying the email your registration email and, if necessary, to proving your identity, including a copy of your national identity document or equivalent identification document (passport, NIE, etc.).
<b>Right not to be the subject of a decision based solely on automated processing (including profiling)</b>	The right not to be the subject of a decision based solely on automated processing, including profiling, that produces legal effects or significantly affects you in a similar way, pursuant to the provisions of Article 22 of the GDPR.	Address a communication in writing via email <a href="mailto:rgpd@deoleo.com">rgpd@deoleo.com</a> with the Ref. "Exercising of Rights" accompanying the email your registration email and, if necessary, to proving your identity, including a copy of your national identity document or equivalent identification document (passport, NIE, etc.).
<b>Right to revoke the consent granted</b>	You shall have the right to withdraw your consent at any time. Revocation of consent shall not affect the lawfulness of the processing performed by the Client based on your consent prior to the withdrawal thereof.	Through the forms, content and privacy configuration spaces provided by the Client, depending on each case, such a revocation may be expressed (for example, requesting the cancellation of the requested newsletter service through the link provided at the end). However, you communicate this by sending an email to: <a href="mailto:rgpd@deoleo.com">rgpd@deoleo.com</a> so that your right can be duly implemented, as laid out in the applicable legal provisions.
<b>Right to file a claim</b>	It implies the possibility	We recommend that

<p><b>with the competent supervisory authority (AEPD)</b></p>	<p>of recourse to the control authority in case you believe of your rights to the protection of personal data have been breached (Articles 13 and 14 of the GDPR)</p>	<p>before submitting any complaint or claim to the Spanish Agency for Data Protection (AEPD), you kindly contact us to analyse the specific situation and try, if necessary, to find an effective and amicable solution. The aforesaid notwithstanding, if you wish, you can also refer to the web page of the AEPD <a href="http://www.aepd.es">www.aepd.es</a></p>
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***11. ARE MEASURES FOR THE SECURITY AND PROTECTION OF YOUR PERSONAL DATA IMPLEMENTED?***

Taking into account the nature, scope, context and the purposes indicated of the data processing, as well as the wide variety and gravity of the possible risks that might affect your rights and freedoms, DEOLEO applies (and shall apply) the appropriate technical and organisational measures in order to guarantee the due security and protection of your personal data, pursuant to privacy criteria imbedded in the design and by default, as well as by applying a system to approach concurrent risks, which shall be reviewed and updated by DEOLEO if and when necessary.

The use of the Hyper-Text Transfer Protocol (HTTPS) in our platform is a reinforced guarantee for the security of your personal data.

***12. VALIDITY & AMENDMENT OF THE PRIVACY POLICY***

This policy is effective as of 25<sup>th</sup> May 2018.

DEOLEO reserves the right to amend this policy and to adapt it to future legislative, doctrinal or case law developments that are applicable thereto, or for technical, operational, commercial, corporate and business reasons. DEOLEO shall inform you beforehand of any changes therein whenever possible and reasonable. In any case, it is recommended that you read this Privacy Policy in detail every time you access the Platform, since any amendment shall be published therein.

Likewise, DEOLEO may personally inform you of the changes projected in this Policy, before the aforesaid changes come into force, provided that this is



technically and reasonably possible, particularly when you are a registered user or a DEOLEO customer.

### ***13. DO YOU NEED TO CONTACT US?***

Should you have any questions or suggestions about this Privacy Policy that you would like to convey to us, please do not hesitate to contact us at [rgpd@deoleo.com](mailto:rgpd@deoleo.com)

### ***14. COMPETENCE AND APPLICABLE JURISDICTION***

In general, any dispute and conflict shall be subject to preferential consideration by the parties, for the purpose of seeking an amicable solution and by mutual agreement using, to this end, the channel and email provided in Section 13 of this Policy.

Should the aforesaid solution not be possible, it is noted that the relevant authority that shall control any conflicts, disputes or claims related to this Privacy Policy shall be the Spanish Agency for Data Protection (AEPD – Spanish acronym), pursuant to the criteria set forth within the GDPR (which determines the jurisdiction of the leading, or main, authority); it shall have to adhere, in any case, to the provisions laid out in Article 56 of the GDPR. In terms of the right to an effective judicial review against the Client in such cases, the provisions of Article 79.2 of the GDPR shall also apply. With regard to the right to effective judicial protection against the Client in these cases, the provisions of Article 79.2 of the GDPR shall also apply, and the corresponding action may be brought before the Judges and Courts of the City of Madrid insofar as that the controller is a company based in Spain. The current Spanish and European Legal provisions, which are applicable in this sphere, shall be complied with.