

Privacy Policy.

Below is our **privacy policy** (hereinafter, "**online privacy policy**" o "**policy**") which governs the web platform <https://bertollioliveoil.com.au/> (hereinafter, "**the Platform**"), under the ownership of **DEOLEO GLOBAL, S.A.U.** (hereinafter, "**DEOLEO**" or "**we**"), with headquarters in Rivas-Vaciamadrid (Madrid), calle Marie Curie, 7, Edificio Beta (Parque Empresarial Rivas Futura), with Tax Identification Number A-88465802, registered in the Business Registry of Cordoba Tome 2702, sheet 81, page CO-40600.

PLEASE DEVOTE A FEW MINUTES TO READING OUR PRIVACY POLICY;IT SHOULD 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 INFORMATION 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 information, we refer to all types of information concerning an identified or reasonably 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 NAVEGATE OR USE OUR WEB PLATFORM, WHO IS THE CONTROLLER OF YOUR PERSONAL INFORMATION?

We are your personal information processing controllers, namely:

Full name of the Company: DEOLEO GLOBAL, S.A.U.
Registered Office: Ctra. N-IV, Km 388, Alcolea (Cordoba)
Physical location/headquaters: Rivas-Vaciamadrid (Madrid), Calle Marie Curie 7, Edificio Beta (Parque Empresarial Rivas Futura), Spain

Email address: rgpd@deoleo.com

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

3. WHAT TYPE OF DATA DO WE PROCESS?

The **processing of your personal information 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 information in a legitimate and consistent manner, pursuant to the principles and legal obligations outlined in the Privacy Act 1988 (Cth) (Privacy Act).** The kinds of personal information that we collect and hold includes:

- First name;
- Last name;
- Telephone number;
- Email; and
- Any personal information included by the user in the message he/she sends through the Contact Form.

When you browse our Platform you should be aware of the cookies that are installed on your data terminal or device, since this may involve the processing of your personal information, pursuant to the classification of cookies reported and their specific purposes (see our [Cookies Policy](#)). When you enter on our Platform for the first time, a Cookies acceptance banner appears with two different options to select one. These options consist on (1) accepting the use of essential cookies (technical cookies which help the platform to work) on your browser or on (2) accepting all cookies used (essential and analytical cookies) on our Platform. By selecting one of the options of the Cookies acceptance banner, you give your explicit consent on the use of those cookies on your browser. Additionally, the banner includes a link to this Policy and to our Cookies Policy, where you can find full information on Cookies used on our Platform and how to configure or delete the use of those Cookies on your browser.

4. HOW DO WE COLLECT YOUR PERSONAL INFORMATION

'We may collect personal information about you in different ways, including:

- (a) from your interaction with our website (please see our Cookies Policy), and
- (b) when you contact us through our Contact Form, available on the Platform.

5. WHAT DO WE USE YOUR DATA FOR?

The personal information 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.
- **Allowing uses associated with the cookies of the Platform**, as described in our [Cookies Policy](#);
- Should you accept the use of cookies on the Platform by accepting our Cookies acceptance banner, you thus accept that you are subject to the purposes associated with the different cookies accepted; which may be analytical cookies (browsing profile/user cookies), if accepted; 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.
- **Establishing as many applicable protection measures as possible, in accordance with security requirements in the Privacy Act**, including the potential anonymisation of your personal information, 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 information protection;
- **Applying the relevant security, technical and/or organisational measures to your personal information, with a view to prevent existing risks** at any time, including the pseudonymisation or encryption of your personal information through our Platform.

6. HOW LONG ARE YOUR PERSONAL INFORMATION STORED?

<i>Personal information associated with the processing purposes reported</i>	<i>Personal Information storage periods or criteria</i>
Data associated with the user's navigation through our platform	-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;

	-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 Cookies Policy).
Address requests or claims according to the forms or claims you send us.	-The amount of time required to correctly respond to your requests and/or specific claims according to each case.
Solve your doubts about our services in a streamlined and efficient way	-The amount of time that is strictly required to resolve or process the aforementioned requests and/or specific claims.
Allow and manage your registration as a user if you require it.	-Until you request the effective withdrawal of your registration. If you are a DEOLEO customer, the personal information retention periods described in these cases may be applied as indicated below.
Establish as many measures of protection are applicable in accordance with current legal provisions.	Protecting personal information does not impact how long we store it for, unless the protection measure is de-identification of the information, in which case it is no longer personal information and may be stored for longer periods.
Apply relevant security, technical and/or organisational measures to your personal information, with a view to prevent existing risks at any time.	Applying relevant security, technical and/or organisational measures to your personal information does not impact how long we store it for, unless the measure is de-identification of the information, in which case it is no longer personal information and may be stored for longer periods.

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

- 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, we will take reasonable steps to destroy personal information, or ensure it is de-identified, when we no longer need the information for a purpose permitted under the Privacy Act and we are not required by law to retain it.

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

We try to request or use the minimum amount of essential information when processing personal information, 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 information 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 information that you provide, according to each case, must be in any event:

- Reasonably necessary for one or more of our functions or activities, with the utmost respect for the principles of purpose limitations and of minimisation of personal information;
- Accurate, up-to-date, complete, relevant 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 information accuracy.

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

8. DO WE SHARE YOUR PERSONAL INFORMATION WITH THIRD PARTIES?

In general, we neither sell, offer nor share your data with third parties. Notwithstanding, your personal information may be shared with other companies in the Group of Companies to which DEOLEO belongs for purely internal and administrative purposes.

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 information 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, 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 INFORMATION?

We inform you that international transfers of your personal information are expected, as DEOLEO and our personal information processors referred to in the previous section of this privacy policy are based in Spain.

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

<i>Your rights</i>	<i>What does it mean?</i>	<i>How can it be exercised?</i>
Right of access	The right to obtain access to your personal information that DEOLEO holds (subject to certain exceptions).	Address a communication in writing via email to rgpd@deoleo.com with the Ref. "Exercising of Rights" accompanying the email your registration email. We may need to verify your identity before responding to your request. Subject to any applicable exceptions or requirements, we will provide you with access to the personal information you request within a reasonable time and usually within 30 days. If we decide to refuse your request, we will tell you why in writing (where reasonable) and how to complain.
Right of correction	Right to obtain the correction of your personal information (subject to certain exceptions).	Address a communication in writing via email to rgpd@deoleo.com with the Ref. "Exercising of Rights" accompanying the email your registration email. We may need to verify your identity before responding to your request. Subject to any applicable exceptions or requirements, we will correct your personal information within a reasonable time and usually within 30 days. If we decide to refuse your request, we will tell you why in writing (where reasonable) and how to complain.

Right to revoke the consent granted	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 DEOLEO based on your consent prior to the withdrawal thereof.	You communicate this by sending an email to: rgpd@deoleo.com so that your right can be duly implemented, as laid out in the applicable legal provisions.
Right to make a complaint	If you believe we have breached your privacy, you have a right to lodge a complaint with the Office of the Australian Information Commissioner (OAIC).	We recommend that before submitting any complaint or claim to the OAIC, you kindly contact us to analyse the specific situation and try, if necessary, to find an effective and amicable solution. You can contact us by sending an email to rgpd@deoleo.com . If you are not satisfied with our response, you may complain to the OAIC via the OAIC website, www.oaic.gov.au

11. HOW DO WE STORE YOUR PERSONAL INFORMATION?

We store your personal information in hard copy and electronically.

12. ARE MEASURES FOR THE SECURITY AND PROTECTION OF YOUR PERSONAL INFORMATION 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 information, 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 information.

13. VALIDITY & AMENDMENT OF THE PRIVACY POLICY

This policy is effective as of 18th November 2020.

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.

14. 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

15. 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 Office of the Australian Information Commissioner or other relevant authority.