

Whiskystats Privacy Statement

Introduction

Whiskystats B.V. (“Whiskystats”, “we” or “us”, company details below) offers a subscription service that provides its members access to the most comprehensive, transparent and trusted source of whisky bottle and cask information, including secondary market values of (mostly) whisky (“Service”). At Whiskystats we connect factual bottle information with whisky ratings, retail and secondary market price observations to provide valued insights for whisky enthusiasts, collectors, investors and professionals.

This Privacy Statement (“Privacy Statement”) explains how we use your (“you”, “Member”) personal information. By using our website(s) and registering for the Service, you expressly confirm acknowledgment and acceptance of the Privacy Statement and agree to be bound by it.

If you have any questions about our use of your personal information, cookies or similar technologies, please contact our Privacy Team by email at privacy@whiskystats.com.

Personal information we collect

We collect and use personal information you provide to us: first and last name, user name, email address and country of residence. We collect this information in a variety of ways, e.g. when you provide it while using the Service, when you make contributions to the Service, when you interact with us.

We collect and use personal information we collect automatically: information about you and your use of the Service, information regarding your network, devices (device ID), IP address, information collected via the use of cookies, web beacons.

Use of personal information, legal basis

We use personal information to provide, analyze, administer, enhance and personalize the Service, to process your registration and payments, to communicate with you on these and other topics, and for customer care.

The legal basis for collecting and using the personal information as set out in this Privacy Statement depends on the personal information concerned and the specific context and nature in which we collect and use it. In general we will collect and use your personal information to perform a contract with you (to provide the Service), or if we have a legitimate interest in the processing of your personal information and this interest is not overridden by your interests or fundamental rights and freedoms or if we have your consent to do so.

We may also be required by law to collect and process your personal information or otherwise need it to protect your vital interests or those of someone else (e.g. to prevent payment fraud or confirm your age and/or identity).

Disclosure of your personal information

We disclose your personal information for certain purposes to group companies affiliated to us: we share your personal information among our group companies as needed for providing you with the Service, providing customer support, making decisions about improvements to the Service; development of the Service.

We disclose your personal information for certain purposes to other companies, agents or third party service providers (TPSPs) to perform services on our behalf or to assist us with the provision the Service to you. For example, we engage TPSPs to provide payment infrastructure, to provide bank account or balance information, to process credit card transactions or other payment methods, to provide security infrastructure and IT services. These TPSPs may have access to your personal information. We do not authorize them to use or disclose your personal information except in connection with providing their services to us.

And we may disclose your personal information with third parties in connection with any reorganization, restructuring, merger or sale, or other transfer of assets, in which case we will transfer personal information, provided that the receiving party agrees to respect your personal information in a manner that is consistent with our Privacy Statement.

Processing period

We collect and process your personal information as long as you use our Service and we retain personal information thereafter as required or permitted by applicable laws and regulations; e.g. for our billing and administration purposes. In particular, we retain information for our legitimate interests and essential business purposes, such as to operate, maintain and improve the Services, comply with our legal obligations (e.g. pertaining to taxes for which purpose records must be kept for up to 10 years), and exercise our legal rights and remedies, including to enforce our General Terms and Conditions. We take reasonable steps to securely destroy or anonymize personal data when it is no longer needed.

Your personal information and rights

You have certain rights in relation to your personal information and our processing of your personal information. In particular you have the right to withdraw your consent to the processing of your personal information at any time, the right to correct or supplement your personal information, the right to request restriction of processing, the right to raise an objection to or a complaint of the processing of your personal information, the right to access your personal data, the right to request the transfer of your personal information, the right to be informed of a breach of security of your personal information and, under certain conditions, the right to the deletion of certain personal data we information about you.

Please contact us if you want to exercise your rights, see contact details below.

Security

We use commercially reasonable administrative, logical, physical and managerial measures to safeguard your personal information against loss, theft and unauthorized access, use and modification. These measures are designed to provide a level of security appropriate to the risks of processing your personal information. Unfortunately, no data transmission over the internet or data storage system can be guaranteed to be 100% secure and as a result we cannot guarantee the security of your personal information.

Changes to our Privacy Statement

We may update our Privacy Statement from time to time. We will provide notice of any such changes through our Services and/or per email. Your continued use of the Service after any such updates take effect will constitute acknowledgement and (as applicable) acceptance of those changes. If you do

not wish to acknowledge or accept any updates to this Privacy Statement, you may terminate your subscription to the Service.

Cookies

We (and our TPSPs) use cookies and other technologies (such as web beacons), as well as resettable device identifiers, for various reasons. If you have registered with us then your computer will store an identifying cookie which will save you time each time you revisit the Service by remembering your email address (and password) for you. You can change the settings on your browser to prevent cookies being stored on your computer without your explicit consent. However in a few cases some of the functionalities of our Services may not function properly as a result.

The Service uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. In case of activation of the IP anonymization, Google will truncate/anonymize the last octet of the IP address for Member States of the European Union as well as for other parties to the Agreement on the European Economic Area. Only in exceptional cases, the full IP address is sent to and shortened by Google servers in the USA. On behalf of the website provider Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage to the website provider. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of this website. Furthermore you can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=en-GB>. Further information concerning the terms and conditions of use and data privacy can be found at <http://www.google.com/analytics/terms/gb.html> or at https://www.google.de/intl/en_uk/policies/.

About Whiskystats and contact details

Whiskystats B.V. is the Dutch private limited liability company, having its statutory seat in Rotterdam, The Netherlands and its office at Zwaanshals 530, 3035 KS Rotterdam, The Netherlands. Whiskystats BV is registered with the Dutch Chamber of Commerce under no. 81761287.

Any questions, requests and inquiries may be directed at:

privacy@whiskystats.com

or at:

Whiskystats B.V.
attn. Privacy Team
Zwaanshals 530
3035 KS Rotterdam
The Netherlands

Version

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