

## **PRIVACY POLICY**

### **DIABOLICA WINES**

www.diabolicawines.com

At Diabolica Wines, the protection of your personal information is a priority. We know that privacy is important to you and we take it seriously!

We wrote this Privacy Policy to help you understand how we collect, use, disclose and protect your personal information when you are navigating this website (<https://www.diabolicawines.com>) and interacting with us, such as when you are acquiring our products.

We may have to change this privacy policy to reflect new regulations, new technologies or changes to how we collect, use or disclose your personal information.

#### **What do we mean by personal information?**

Personal information means all types of information that allow us to identify you. Your name, e-mail and your computer's IP are all examples of personal information. Since your computer's IP can help us identify you, we treat "cookies" as personal information, please see our "**COOKIE POLICY**" below to detailed information about them.

#### **What personal information do we process about you?**

Most of the personal information that we collect about you when using this website can be classified in these categories:

- **Identification and professional data**, such as your name, phone numbers, and e-mails.
- **Electronic data**, such as your IP and cookies installed on your devices;

#### **Why do we process your personal information?**

We process personal information to:

- get in touch with you after you submit an inquiry;
- process your orders and deliver our products to you;
- if you join our mailing list, send you promotional information on our products, so that you never miss a good deal again, or to invite you to our events so that we can celebrate our relationship and get to know each other better! Don't worry, you can always unsubscribe. If you want to know how, click here to jump to this section of our privacy policy.
- if you consent, conduct survey on your satisfaction with our products;
- better understand your interests or preferences, and globally improve our website, products, and services accordingly;
- provide you with advertising about products that we think may be interesting based on your habits, through re-targeting on Facebook. [Click here](#) for more information, including how you can opt-out of re-targeting through Facebook.
- manage and administer our website;
- notify you about changes to our Privacy Policy and other legal terms.

## **How can I withdraw my consent to receive electronic communications?**

You can unsubscribe from our electronic communications by:

- Clicking the 'unsubscribe' link in the electronic communications, where applicable;
- Updating your preferences in your account, where applicable;
- Send an e-mail to us, and we will help you out ([helpdesk@markanthony.com](mailto:helpdesk@markanthony.com))

## **How can I delete my account with you?**

We hope that you want to stay with us for a long time, but if you would like to delete your account, we will assist you in doing so. You can e-mail us at [helpdesk@markanthony.com](mailto:helpdesk@markanthony.com).

## **How do you protect my personal information?**

We strive to implement adequate measures to protect your personal information.

Unfortunately, we can never promise that the Internet will be 100% secure. Please do not share your credentials across your organization or leave it on a post it for everyone to see!

## **Who will access my personal information in your organization?**

We only allow our employees to see your personal information on a need to know basis. Our employees handling personal information are subject to confidential agreements.

## **Do we share your personal information with third-parties?**

Let's be clear, we will never sell your information to third-parties.

However, we may need to share your personal information with third-parties that we partner with to provide you with our products, to operate our websites, or for advertising purposes:

These third parties can be classified in the following categories:

- **Delivery partners**, to deliver our products to the right location;
- **Financial partners**, to process your payment and allow you to enjoy our products;
- **Marketing partners**, which we use to send you promotional communications, and provide you with interest-based advertising. We may also use Facebook to provide you with relevant advertising.
- **IT service providers**, such as our data hosting provider;

It's possible that we may have to share your personal information to comply with a legal order. When we receive such requests, we do all necessary verifications to ensure that they are lawful and if possible, we inform you of this request prior to share your personal information.

We reserve the right to transfer your personal information if we sell or transfer our business operation. We reserve the same right in case of merger, acquisition, bankruptcy, reorganization or sale of assets. The usage of this personal information will, however, be limited by the terms of this Privacy Policy.

This website may include links to third parties, including social media. If you click on these links, you are leaving our website and the collection, use and disclosure of your personal information will be subject to these third-parties' privacy practices.

## **Where will my personal information be stored?**

Our website is hosted in Canada and the United States.

However, when we share your personal information with our trusted partners, they may store some of your personal information in their databases in the United States, or elsewhere.

## **How long do we hold your personal information?**

We keep your personal information as long as we have a business relationship with you, and as long as required under applicable laws. If you would like us to delete some or all of your personal information, or delete your account, you can reach us directly at [helpdesk@markanthony.com](mailto:helpdesk@markanthony.com), and we will try our best to help you.

## **What are my rights regarding my personal information??**

Different laws allow you to exercise some rights about your personal information. Depending on where you are located, these rights can vary. They usually include the right to:

- access copies of the personal information that collect, use and disclose about you, as long as such data remain available in our databases;
- ask for the rectification of your personal information in case it is incorrect, incomplete, invalid or ambiguous.

If you want to exercise any of these rights, we will do our best to help you free of charge. If you want to simply look at your order history, you can do so from your account.

If you request a transcription, reproduction or transmission of your personal information, we may have to charge a reasonable fee to process your request, subject to applicable laws. In this case, we will contact you about these charges before addressing your request.

Additionally, in some cases, your ability to access or control your personal information will be limited, as required or permitted under the applicable laws. If your request is denied, we will notify you in writing, with the motives for our refusal and information on how to appeal of our decision. We will keep the relevant personal information until you will have exhausted the recourse provided by law. In any event, we will respond not later than thirty (30) days after the reception of your request.

If you have any questions about your rights or if you want to exercise them, you may send an email to [helpdesk@markanthony.com](mailto:helpdesk@markanthony.com).

## **COOKIE POLICY**

### **What are Cookies?**

A cookie is an alphanumeric identifiers or small data text files that are sent from a server during a browsing session. It is a small piece of information that is placed on your computer when you visit certain websites. When we refer to “cookies” we include other technologies with similar purposes, such as tags and identifiers. Find out more about the use of cookies on <http://www.cookiecentral.com/>.

### **Why do we use Cookies?**

- To improve your experience when navigating our website;
- To remember some of your preferences, or save some your credentials for your next visit;

- To perform analytics and understand the pages and advertisements that you like, how you ended up on our website and from what type of devices;
- To do re-targeting and ensure that you are presented with relevant ads about our products;
- If you subscribe to our mail list, we can use cookies to know if you opened your e-mail and if so, from what device. If you click on an offer that we sent you by e-mail, you will be redirected to our website and we will know that you came on our website through this communication. This will help us understand which promotions work better than others for you and allow us to send you more personalized offers.
- Within our e-commerce platform, we use cookies to personalize your experience, which may include showing you preferred products, for instance. This is done through Active Campaign, and because we have stored your client information. Since we only sell our products in a business to business situation, this information is about your purchase as a business, and not as an individual.

### **What type of Cookies do we use?**

When you browse our website, different types of cookies are set on your hard disk or your device's storage space. Cookies can be installed by us or can be installed by third-parties.

- First Party Cookies – First party cookies are those that are issued by our website domain, and they can only be set or retrieved by us. They are used for purposes specific to us, such as to personalize the website.
- Third Party Cookies – Third party cookies are usually placed on the website via scripts or tags added to a web page. Sometimes, these scripts will also bring additional functionality to the site.

We use different categories of cookies, which we classified using the standard from the International Chamber of Commerce:

- Strictly Necessary – These cookies are essential to enable you to navigate our website and use its features, such as accessing the Order Desk. For instance, we use a cookie titled X-CSRF-Token which ensures visitor browsing-security by preventing cross-site request forgery.
- Performance Cookies – Performance cookies collect information about how visitors use a website, such as the pages that visitors go most often, and whether they get an error messages from our web pages. These cookies don't collect information that allow us to specifically identify you; it only provides aggregated information about our visitors. Most performance cookies are persistent. For example, we use a cookie called \_ga which allows Google Analytics to generate aggregated statistical data on how a visitor uses our website.
- Functionality Cookies – These cookies are used for enhanced functionalities that are useful to you, like those associated with Order Desk.
- Targeting Cookies – These cookies are used to deliver advertising more relevant to you and your interests, including by leveraging social medias such as Facebook. They are also used to limit the number of times you see an advertisement, as well as to help measure the effectiveness of a campaign. These cookies can remember that you visited a website and share this information with third parties for re-targeting purposes.

### **How long do cookies stay installed on my device?**

We use both session cookies and persistent cookies.

- Session cookies – Those are files set temporarily on your device and deleted once you close your browser. They are not stored nor transmitted to third parties. We use this type of cookies to ensure you have a *user-friendly* experience. As an example, we use a cookie called JSESSIONID, which allows us to preserve users states across page requests. Most of our cookies are session cookies.
- Persistent cookies – Those remain active on your device for some time, which may vary from a few days to two years after your visit on our website. As an example, we use a cookie call \_cfduid, which remains for a year on your device, and is used by Active Campaign. It allows us to see if you open an e-mail, and clicked on a product, and then the pages that you are navigating on the e-commerce platform. The objective is to provide you with products that are relevant to your business, and make your experience as a buyer more efficient.

### **Can third parties have access to my cookies?**

Let's be clear... We do not allow any add partners to collect your personal data for their own purposes directly on our website. We do not sell your personal data to anyone.

We may display interest-based ads to you when you are using through a tool offered by Facebook called the **Custom Audience Tool**. This tool allows us to personalize our ads based on your shopping experience with us. We do not share any of your personal information, including your shopping history, with Facebook. The tool lets us convert your email address to a unique number that Facebook uses to match to unique numbers it generates from email addresses of its users.

We may also use **Facebook Conversion Tracking Pixel** to record how efficient our advertisements are for statistical and market research purposes. The collected data remains anonymous. This means that we cannot see the personal data of individual user. Facebook may connect the data with your Facebook account and use the data for their own advertising purposes, in accordance with its current privacy policy, which you can find [here](#).

We also use **Google Analytics Demographics and Interest Reporting** to conduct some analytics on our website performance; but don't worry, we can't track you individually. This service only gives us an idea of the overall traffic on our different pages. This is useful to understand which products and features on our website you like... and those that you don't!

### **How can I manage my preferences?**

Browsers and devices have tools that allow you to control cookies; you can block them, ensure that you are notified when you are subject to cookies and control the cookies already stored on your device. However, if you block all of the cookies, you may not be able to access all our functionalities, like the Order Desk.

Depending on the browser that you are using, different instructions are applicable. Click on your browser to have more information:

- Google Chrome
- Firefox
- Safari

If you want to opt-out from **Google Analytics Demographics and Interest Reporting**, you can do so by clicking [here](#).

If you want to opt-out from **Facebook Custom Audience Tool and Conversion Tracking Pixels**, you can do so by clicking [here](#). If you opt out, we will remove you from all our custom audiences.

### **Do we accept Do Not Track signals?**

Legislation in California provides that California residents be entitled to know how we respond to “Do Not Track” browser settings. If activated by you, this setting sends a special signal to the websites you encounter while web browsing indicating that you do not wish to be tracked. We do not respond to Do Not Track signals at this time. If we do so in the future, we will describe how so in this policy.

### **How can I reach you if I have more questions, concerns or any inquiries?**

Alternatively, you can always reach out to us by e-mail: [helpdesk@markanthony.com](mailto:helpdesk@markanthony.com). Our privacy officer will get back to you as soon as possible.