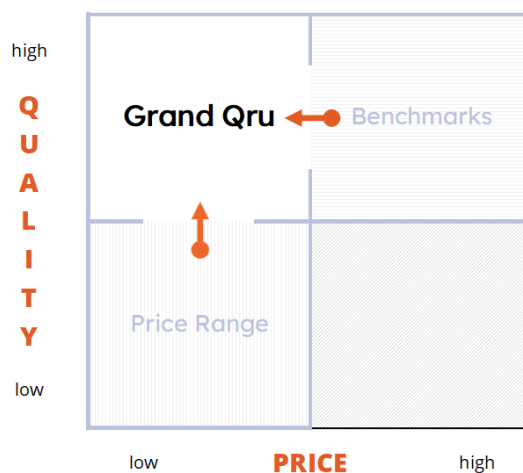


1. THE GRAND QRU E-PLATFORM

While focusing on affordable substitutes for specific premium wines representing specific wine styles, Grand Qru, Q of Quality (in this document referred to as “Grand Qru”, “we” or “our”) is an e-Platform that independently distributes wine advice from Experts to Subscribers. The e-Platform (hereafter: the “e-Platform”) is offered by Grand Qru.

The base is a list marking on the one side a selection of popular wine styles and on the other side for each wine style the name of a premium wines (hereafter Benchmarks). Grand Qru will turn to internationally highly skilled independent experts, like certified sommeliers, journalists ... (in this document referred to as “Experts”) to find out which wines approach the style and the quality of one or more Benchmarks at a fraction of the price (hereafter “Substitutes”).



We bundle the advices from the Experts in Grand Qru Report, a newsletter that will be distribute via our e-Platform (e.g. e-mail, social media, post ...). Persons that are interested (in this document referred to as “Subscriber(s)”) can subscribe.



In order to be able to offer Grand Qru Report for free to Subscribers, we may add marketing for high value for money related products or services.

2. WHY THIS PRIVACY POLICY?

Every Subscriber or Expert will in most cases disclose a certain amount of personal data. The personal data is information which allows Grand Qru to identify you as a natural person, regardless of whether we actually do this. You are identifiable as soon as it is possible to create a direct or indirect link between one or more data and you as a natural person. The Subscriber(s), and the Expert(s) in this document are referred to as the "Data Subject(s), User(s) or "you" or "your".

We only use and process your personal data in accordance with the GDPR and any replacement legislation, or any similar regulation under any applicable law, and any regulatory requirements or codes of practice governing the use, storage or transmission of personal data. Every reference in this Privacy Policy to the 'GDPR' is a reference to the *Regulation of 27 April 2016 on the Protection of Natural Persons with regard to the Processing of Personal Data and on the Free Movement of such Data (General Data Protection Regulation)*.

Through this Privacy Policy, every Data Subject is informed of the processing activities Grand Qru may carry out with his or her personal data. Grand Qru always reserves the right to modify this Privacy Policy. Every substantial change will be clearly communicated towards the involved Data Subject. We advise you to consult this document regularly.

3. WHO IS RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA?

- 3.1. **Controller** : Grand Qru is responsible for the processing and decides alone or in cooperation with others which personal data is being collected as well as the purposes and the technical and organisational means with regard to the processing of this personal data. .
- 3.2. **Processor(s)** : Grand Qru is free to rely on data processors. A processor is the natural or legal person who processes your personal data upon request and on behalf of the data controller. The processor is required to ensure the security and confidentiality of the data. The processor shall always act on the instructions of the data controller.

Grand Qru may rely on the following categories of "processors":

- Companies and/or individuals we have engaged for marketing purposes, including the management and distribution of our newsletter(s) ;

- Companies and/or individuals we have engaged for ICT technical support and hosting purposes;
- Companies and/or individuals we have engaged for administrative purposes (e.g. CRM system);
- Companies and/or individuals we have enabled for communication purposes
- Companies and/or individuals we have engaged for logistic purposes (e.g. order picking, delivery, etc.);
- Companies we have engaged for analytical purposes;
- Companies we have engaged for payment purposes.
- Companies we have engaged for content information (e.g. Experts)

With a view to the optimal protection of the personal data of our DASU, we make contractual arrangements with the aforementioned data processors to ensure that they apply the highest privacy standards. In any event, data processors shall be required to ensure the security and confidentiality of the personal data.

As a resident of the European Economic Area, a transfer of your personal data outside the European Economic Area (EEA) can only take place to countries that the Data Protection Authority in Belgium has found to provide the same adequate level of protection or, if this is not the case, to the extent that Grand Qru has made the necessary contractual arrangements, taking into account the standard provisions as imposed by the Data Protection Authority in Belgium, to ensure that your personal information receives an adequate level of protection.

4. ON WHAT LEGAL GROUNDS IS YOUR PERSONAL DATA PROCESSED?

In accordance with the GDPR we process personal data on the following legal grounds:

- On the basis of compliance with legal or regulatory provisions with regard to the management of the (pre)contractual relationship with the Data Subject ; or
- On the basis of freely given consent by Expert(s) to share their advice, tips, information, professional data ... via our e-Platform and/or Newsletter(s)
- On the basis of our legitimate interest to conduct relevant quality controls
- On the basis of freely given consent by Subscribers to receive information on high value for money wines via our e-Platform and/or Newsletter(s) in which we may include marketing for other high value for money products or services. In this respect Subscribers must read and agree with our Terms and Conditions prior to accepting this Privacy Policy. Our Terms and Conditions can be read via this link :

5. WHICH PERSONAL DATA IS PROCESSED?

Grand Qru commits to only collect and process your personal data in a way that is adequate, relevant and limited to what is necessary for the purposes for which they are processed.

How much and what personal information Grand Qru collects about you depends on your use of the E-Platform and/or of our services. The collection of personal data will be further expanded as more intensive use is made of our E-Platform and our services.

All Data Subjects

- Personal identification data (name, first name, address, country and login details)
- Contact details (telephone number and e-mail address)
- Financial identification data (bank details)
- Personal data (gender, age, date and place of birth, nationality, language)
- Product interests and services interests

Experts

- Submitted advice, tips and comments on wine
- Professional identification data

6. FOR WHICH PURPOSES IS YOUR PERSONAL DATA USED?

6.1. The processing of your personal data is essential for the proper functioning of our E-Platform, the collection of the expert advice, the organization of (blind) tastings and/or quality controls, and/or the distribution by e-mail (or similar notification) of our newsletter on high value for money wines and marketing for other high value for money products or services to that we issue the newsletters for free to Subscribers.

The **Data Subject's** personal data may also be used for the following purposes:

- Dispute management.
- Protection against fraud and criminal offences.
- Answering requests for information

6.2. We also use cookies in order to recognise the (IP address of) Data Subjects and to offer them a personalised user experience, to remember technical choices (e.g. language choices, product preferences or location) and to detect and correct any errors which might be present on the E-

Platform. For more information concerning the use of cookies, we kindly refer you to our Cookie Policy.

- 6.3. When visiting the E-Platform, some data is being collected for statistical purposes. Such data is necessary to optimise your user experience. It concerns the following data: probable location of consultation, hour and day of the consultation and the pages which are being consulted, etc. In order to protect your privacy in the best possible way, this data is always anonymized.
- 6.4. Under no circumstances do we collect sensitive personal data, such as data about your race, political opinions, health, religious and other beliefs, sexual orientation or the like.
- 6.5. The User provides the personal data to Grand Qru himself and therefore retains a certain degree of control. Grand Qru reserves the right to suspend or cancel certain operations if the required personal data is missing, incorrect or incomplete.

7. WHO RECEIVES YOUR PERSONAL DATA?

Your personal data will be processed for internal use within Grand Qru, or it will be passed on or communicated to third parties if the transmission is necessary to achieve the purpose pursued.

8. HOW LONG DO WE STORE YOUR PERSONAL DATA?

Your personal data is stored as long as necessary to achieve the purposes pursued. Your personal data will be erased from our database as soon as it is no longer necessary for the purposes pursued or if you validly exercise your right to erasure.

9. WHAT ARE YOUR RIGHTS?

- 9.1. **Guarantee of a legitimate and secure process of your personal data** : Your personal data is solely processed for the purposes explained in this policy, and is not kept longer than necessary to achieve the intended purposes.
- 9.2. **Right to access** : you have the right to obtain information about the processing of your personal data.
- 9.3. **Right to rectification of your personal data** : you have the right to correct inaccurate or incomplete personal data.
- 9.4. **Right to erasure (or "right to be forgotten")** : you have the right to obtain the erasure of your personal data under the following assumptions:

- Your personal data is no longer necessary for the intended purposes;
- You withdraw your consent to the processing and there is no other legal ground for processing;
- You have validly exercised your right of opposition;
- Your personal data has been illegally processed;
- Your personal data must be deleted to comply with a legal obligation.

The deletion of personal data is mainly related to visibility; it is possible that the deleted data are still temporarily stored.

- 9.5. **Right to limitation of processing** : In certain cases, you have the right to request the limitation of the processing of your personal data, especially in case of dispute as to the accuracy of the data, if the personal data is necessary in the context of legal proceedings or the time required to Grand Qru to verify that you can validly exercise your right to erasure.
- 9.6. **Right to object** : You have the right to object the processing of your personal data for direct marketing purposes. We will stop processing your personal data unless it can demonstrate that there are compelling legitimate reasons for the processing which prevail over your right to object.
- 9.7. **Right to data portability** : You have the right to obtain any personal data which you have provided us in a structured, commonly used and machine-readable format. At your request, this data may be transferred to another provider unless it is technically impossible.
- 9.8. **Right to withdraw your consent** : You may withdraw your consent to the processing of your personal data at any time, for example for direct marketing purposes.

10. HOW TO EXERCISE YOUR RIGHTS?

If you wish to exercise your rights, you must send a written request and proof of identity by registered mail. We will respond no later than thirty (30) working days after receipt of the request.

11. POSSIBILITY TO LODGE A COMPLAINT

If you have any comments or complaints about the way in which we handle your personal data, we ask you to report them to us first. In this way, we can reach an amicable solution by mutual agreement. If, after this notification, you are still not satisfied with the processing of your

personal data by Grand Qru, you have the right to lodge a complaint with the competent Data Protection Authority (for Belgium: <https://www.dataprotectionauthority.be/>).

12. Disclaimer : Grand Qru is mainly focussed on wine

If you are not allowed to drink alcohol for whatsoever reason, then you must refrain to use our e-Platform and/or to subscribe to our newsletter and/or to join our tastings and/or to use our advice and/or to use our products or services. That because Grand Qru is mainly focussed on wine and/or other alcoholic beverages.

13. Address and identification of Grand Qru

Grand Qru is owned, managed and operated by :

Tom Baert - Berenbroekstraat 28 - 3600 Genk - Belgium

Registered Company Number : BE 0 xxx xxx xxx