

## WEBSITE PRIVACY POLICY

[www.tequilasu.com](http://www.tequilasu.com)

### I. PRIVACY AND DATA PROTECTION POLICY

In compliance with current legislation, SU Tequila (hereinafter also referred to as the Website) undertakes to implement the necessary technical and organizational measures appropriate to the level of security required for the risk posed by the data collected.

#### Legislation incorporated in this privacy policy

This privacy policy is adapted to current Spanish and European regulations on the protection of personal data online. Specifically, it complies with the following regulations:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons regarding the processing of personal data and the free movement of such data (GDPR).
- Organic Law 3/2018 of December 5 on the Protection of Personal Data and guarantee of digital rights (LOPD-GDD).
- Royal Decree 1720/2007 of December 21, approving the Regulation implementing Organic Law 15/1999 of December 13 on the Protection of Personal Data (RDLOPD).
- Law 34/2002 of July 11 on Information Society Services and Electronic Commerce (LSSI-CE).

#### Identity of the data controller

The data controller for the personal data collected on SU Tequila is: SPECIAL MEASURE, SL, with NIF/CIF: B56563091 and registered with the Commercial Registry of Gipuzkoa with the following registration details: Volume 3122, Page 45, Sheet 45557, represented by Akim Simsek (hereinafter, Data Controller). Contact details:

- Address: C/Irigoyen, 4 Donostia 20009
- Email: [a@tequilasu.com](mailto:a@tequilasu.com)

#### Personal Data Registration

In compliance with the GDPR and LOPD-GDD, we inform you that the personal data collected through SU Tequila's forms will be included and processed in our file in order to facilitate, expedite, and fulfill the commitments established between SU Tequila and the User or to maintain the relationship established in the forms filled out, or to respond to a request or inquiry. Furthermore, in accordance with the GDPR and LOPD-GDD (except where the exception of Article 30.5 GDPR applies), a record of processing activities is maintained, detailing the purpose and scope of processing.

#### Principles applicable to the processing of personal data

The processing of the User's personal data shall be subject to the following principles under Article 5 of the GDPR and Articles 4 et seq. of Organic Law 3/2018:

- **Lawfulness, fairness, and transparency:** User consent will be required at all times after being fully informed of the purposes of the data collection.
- **Purpose limitation:** Data will be collected for specific, explicit, and legitimate purposes.
- **Data minimization:** Only the data necessary for the stated purposes will be collected.
- **Accuracy:** Personal data must be accurate and kept up to date.

- **Storage limitation:** Data will only be retained as long as necessary for processing.
- **Integrity and confidentiality:** Data will be processed securely and confidentially.
- **Accountability:** The Data Controller is responsible for compliance with the above principles.

### **Categories of personal data**

The only category of data processed by SU Tequila is identifying data. No special categories of personal data, as defined in Article 9 GDPR, are processed.

### **Legal basis for processing personal data**

The legal basis for data processing is consent. SU Tequila commits to obtaining the User's express and verifiable consent for the processing of their personal data for one or more specific purposes.

Users have the right to withdraw their consent at any time, as easily as it was given. Withdrawal of consent does not affect use of the Website.

If data is requested via forms for inquiries, information, or content-related matters, Users will be informed when completing a form is mandatory for correct processing.

### **Purposes of data processing**

Personal data is collected and managed by SU Tequila to facilitate and fulfill commitments made between the Website and the User or to maintain the relationship created in the forms the User completes, or to respond to a request or inquiry.

Data may also be used for personalized, operational, and statistical commercial purposes, and for marketing studies to tailor content and improve quality, functionality, and user experience.

Users will be informed of the specific purposes of the data processing at the time of data collection.

### **Data retention periods**

Personal data will be kept for the minimum time necessary for the processing purposes and, in any case, only for 18 months or until the User requests deletion.

At the time of data collection, the User will be informed of the retention period or the criteria used to determine it.

### **Recipients of personal data**

User data may be shared with the following recipients or categories of recipients:

- IONOS Cloud S.L.U., Avenida de la Vega, 1 Edificio Veganova 3 Planta 5 Puerta C Alcobendas 28108 Madrid
- Google Ireland Limited (Company number: 368047 / VAT number: IE6388047V), Gordon House, Barrow Street, Dublin 4, Ireland
- Shipping companies
- Service providers assisting with business operations
- Legal authorities, if required by law
- Third parties in the event of a merger or acquisition

If data is to be transferred to a third country or international organization, the User will be informed of the destination and the existence or absence of an adequacy decision by the European Commission.

### **Data of minors**

In compliance with Articles 8 GDPR and 7 of Organic Law 3/2018, only individuals over 14 years of age may lawfully consent to the processing of their personal data. If the User is under 14, parental or guardian consent is required.

### **Data confidentiality and security**

SU Tequila undertakes to implement the necessary technical and organizational measures appropriate to the level of risk to guarantee the security of personal data and prevent its accidental or unlawful destruction, loss, alteration, or unauthorized disclosure or access.

The Website uses SSL (Secure Socket Layer) encryption to ensure secure and confidential transmission of personal data.

Despite these precautions, SU Tequila cannot guarantee absolute invulnerability of the internet, and will promptly notify the User of any security breach likely to pose a high risk to their rights and freedoms, as defined in Article 4 of the GDPR.

All personal data will be treated as confidential, and the Data Controller will ensure that confidentiality is upheld by legal or contractual obligation among employees, collaborators, and others granted access.

### **User rights**

Users have the following rights under the GDPR and Organic Law 3/2018:

- **Right of access:** To know whether their data is being processed and obtain details.
- **Right of rectification:** To request modification of inaccurate or incomplete data.
- **Right to erasure ("right to be forgotten"):** To request deletion of data when no longer necessary or in case of unlawful processing.
- **Right to restriction of processing:** To limit the processing in certain cases (e.g., contesting accuracy).
- **Right to data portability:** To receive their data in a structured, machine-readable format and transmit it to another controller.
- **Right to object:** To object to data processing.
- **Right not to be subject to automated decision-making, including profiling.**

Users may exercise these rights by written communication addressed to the Data Controller with reference "GDPR-[www.tequilasu.com](http://www.tequilasu.com)", specifying:

- Name, surname, and copy of ID (or representation proof).
- The specific request or information sought.
- Notification address.
- Date and signature.
- Any supporting documents.

Requests may be sent to:

- **Postal address:** C/Irigoyen, 4 Donostia 20009
- **Email:** a@tequilasu.com

### **Links to third-party websites**

The Website may contain links to third-party websites not operated by SU Tequila. These websites have their own privacy policies and data practices, and SU Tequila assumes no responsibility for them.

### **Complaints to the supervisory authority**

If the User believes that their data is being processed in breach of applicable regulations, they have the right to judicial protection and to lodge a complaint with a supervisory authority. In Spain, this is the **Spanish Data Protection Agency (AEPD)**: <https://www.aepd.es>.

---

## **II. ACCEPTANCE AND CHANGES TO THIS PRIVACY POLICY**

Users must have read and agreed to the conditions regarding the processing of personal data in this Privacy Policy and accept such processing for the Data Controller to proceed. Use of the Website implies acceptance of this Privacy Policy.

SU Tequila reserves the right to modify its Privacy Policy at its own discretion, or due to a legislative, jurisprudential, or doctrinal change from the Spanish Data Protection Agency.

Changes or updates to this Privacy Policy will not be explicitly notified to the User. Users are advised to check this page periodically to stay informed of the latest changes or updates.

This Privacy Policy was updated to comply with Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (GDPR), and with Organic Law 3/2018 of 5 December on the Protection of Personal Data and guarantee of digital rights.

This website's Privacy Policy document was created using the free online privacy policy template generator on 26/03/2025.