

ENJOY WINE & SPIRITS PRIVACY POLICY



At Enjoy Wine & Spirits AB ("Enjoy") we care about your privacy. When you come into contact with us, it may mean that your personal data (such as name, address, e-mail, social security number, phone number, etc.) is processed by us at Enjoy. We protect your privacy, which is why we have adopted this privacy policy. This privacy policy aims to describe in what situations we process your personal data, how we process it, what obligations we have and what rights you have. You only need to read the part that is relevant to you.

Your personal data is always processed in accordance with applicable privacy laws, such as the General Data Protection Regulation and complementary legislation. You can always contact us at info@enjoywine.se if you have any questions or concerns regarding our processing of your personal data.

Personal data controller

Enjoy (Enjoy Wine & Spirits AB, org. nr: 556457-7509, visiting address: Alsnögatan 11, 116 41 Stockholm, phone number: 08-556 947 00, e-mail address: info@enjoywine.se) is the controller in relation to processing of your personal data as described in this policy. If you have any questions or concerns about this policy and/or our processing of your personal data, you are always welcome to contact us at info@enjoywine.se or at 08-556 947 00.

Your rights

Regardless of how or why we process your personal data you always have the following individual rights:

- the right to access what personal data we are processing about you by requesting subject access.
- the right to rectification.
- the right to request erasure (we'll delete personal data that is no longer required).
- the right to request restriction of our processing of your personal data.
- the right to obtain the personal data we process about you in a structured, commonly used and machine-readable format (i.e. data portability).

When we process your personal data based on your consent, you are also entitled to withdraw your consent at any time, free of charge.

If you wish to exercise any of the above rights, please do not hesitate to contact us at info@enjoywine.se.

Complaints

If you have any complaints about our processing of your personal data, you have the right to file a complaint to the Swedish Data Protection Authority (E-mail: datainspektionen@datainspektionen.se, Phone: 08-657 61 00, Website: www.datainspektionen.se).

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1. Newsletter subscribers

1.1. What personal data are we processing?

When you sign up for our newsletter, you are asked to enter your first name, last name, age and e-mail address. When you fill in the information, it means that you provide your personal data to us.

You can register to our newsletter via our website, when you visit our booth at trade fairs or when you participate in any of our competitions. Regardless how you register yourself as a subscriber, we process your personal data with the same purpose, and in the same way.

1.2. Why do we process your personal data?

We process your personal data to send out the newsletter you are a subscriber to. According to applicable law, there is a 25-year limit to receive this kind of communication. Hence, we must process data about your age.

Furthermore, we process your personal data in order to send out invitations to participate in various surveys we conduct. The surveys are often about our business and the products we offer in order to improve and develop our business and our products.

1.3. Legal basis

We process your personal data based on your consent. You can withdraw your consent at any time, free of charge. If you wish to withdraw your consent, please contact info@enjoywine.se or follow the unsubscribe link that you'll find in each newsletter.

1.4. Duration

We process your personal data as long as we have a valid consent from you. If you wish to withdraw for consent, please contact info@enjoywine.se or follow the unsubscribe link that you'll find in each mailing.

1.5. Whom we share your personal data with

If you consent to our newsletter we'll share your personal data with the service we use to create and distribute our newsletters.

If you consent to receive invitations to participate in surveys, your personal data will be shared with the various survey-providers we may use to conduct the survey in question.

We do not share your personal data with any third party unless we are obliged to do so by law. We will not sell your personal information to third parties for direct marketing, and we will not transfer your personal data to countries outside the EU/EEA.

2. Subscribers to the magazine Wine & Friends

2.1. What personal data are we processing?

When you sign up for our magazine, you are asked to enter your first name, last name, age, postal address and e-mail address. When you fill in the information, it means that you provide your personal data to us.

You can register to our magazine via our website, when you visit our booth at trade fairs or when you participate in any of our competitions. Regardless how you register yourself as a subscriber, we process your personal data with the same purpose, and in the same way.

2.2. Why do we process your personal data?

If you fill in a (physical) subscription form in conjunction with a trade fair, we process your personal data to transfer this data to our digital registers. When you are included in our subscription register, your personal data is processed to send the magazine you are a subscriber of. According to applicable law, there is a 25-year limit to receive this kind of communication. Hence, we must process data about your age.

Furthermore, your personal data will be processed to allow us to submit invitations to participate in different surveys (e.g. red wine, label and bottle preferences). We also process your data to send out invitations to wine tastings and events, communicate offers and to inform about temporary launches on Systembolaget. If you do not wish to receive this communication, please contact info@enjoywine.se or follow the unsubscribe link contained in each mailing.

2.3. Legal basis

We process your personal data in order to fulfill our obligations (to send out the magazine you have indicated you want to receive). We process your personal data based on the subscription agreement we have with you. You can terminate the agreement at any time, free of charge. To terminate the agreement, please contact info@enjoywine.se.

The processing that occurs with the purpose of contacting you with surveys, invitations, offers etc., is based on our legitimate interests. We believe that we have a legitimate interest in submitting such inquiries to you as you have shown an interest in the products we offer and we believe you have the knowledge and interest in the products in question. In our opinion, our interest outweighs your interest of protection of your personal data. If you do not wish to receive this communication, please contact info@enjoywine.se or follow the unsubscribe link contained in each mailing.

2.4. Duration

We will process your data for as long as we have an ongoing subscription agreement with you. If you no longer wish to subscribe to the magazine, you can unsubscribe at any time, free of charge, by contacting info@enjoywine.se.

The processing based on our legitimate interest lasts for up to one year after the last customer contact. If you do not wish to receive invitations, surveys, offers, etc. you can unsubscribe at any time, free of charge by contacting info@enjoywine.se or by following the unsubscribe link contained in each mailing.

2.5. Whom we share your personal data with

We share your personal data with the IT services we use to manage our mailing list, our printing company and the service we use to send the magazine home to you. Furthermore, your personal data is shared with the companies we use to send out surveys, invitations, and other communications.

We do not share your personal data with any third party unless we are obliged to do so by law. We will not sell your personal data to third parties for direct marketing, and we will not transfer your personal data to countries outside the EU/EEA.

3. When you participate in any of our competitions

3.1. What personal data are we processing?

When you participate in any of our competitions, you are asked to fill in your name, age, e-mail address and phone number. This is personal data. Usually there is also a free text field where you can - depending on what you write - provide us with your personal data. In some competitions, you also need to submit a picture, which in some cases may constitute personal data.

If you win the competition, we may also ask you to leave your social security number. We will contact you when applicable.

3.2. Why do we process your personal data?

We process your personal data in order to decide if you are eligible to compete (due to applicable age limits according to Swedish law). If you are over 25 years old, we assess your contest contribution and appoint a winner. If you win the competition, we will also process your personal data in order to communicate with you and send the prize to you.

If you win, we need your social security number to register your winnings.

If you sign up for our newsletter (see section 1) or our magazine (see section 2), we will process your personal data in the manner described above.

In addition, your personal data will be processed to allow us to submit offers to participate in various surveys, wine tastings and event invitations, and to announce offers and temporary launches on Systembolaget. If you do not wish to receive this communication, please contact info@enjoywine.se or follow the unsubscribe link contained in each mailing.

3.3. Legal basis

When you submit your contest contribution, we have entered an agreement where we have undertaken to assess your contribution and designate a winner based on all contest contributions, and send out a prize to the winner. To do this, we must process your personal data. Our processing of your personal data in this context is based on our agreement.

If you are designated as the winner, we must process your social security number in order to comply with the legal obligations we are obliged to e.g. concerning tax profits.

In case you sign up for our newsletter and/or magazine when you submit your contest contribution, we process your data on the legal bases described in section 1 and section 2.

Our processing with the purpose of contacting you with surveys, invitations, offers, etc. is based on our legitimate interest. We believe that we have a legitimate interest in sending out such communication to you as you have shown an interest in our business and the products we offer when you participated in the competition. In our opinion, our interest outweighs your interest of protection of your personal data in this context. If you do not wish to receive such communication, please contact info@enjoywine.se or follow the unsubscribe link contained in each mailing.

3.4. Duration

Once the contest is completed and a winner is designated, your personal data will be processed for up to three months. Then we will stop processing your personal data for this purpose. However, such personal data contained in our financial statements may continue to be processed for up to seven years after the end of the financial year in accordance with applicable accounting laws.

In case you have signed up for our newsletter or magazine, we process your personal data until you unsubscribe from the newsletter or cancel your magazine subscription (see section 1-2). However, we will only process the data that is necessary to send out the newsletter and/or the magazine.

Our processing with the purpose of communication with you, based on our legitimate interests, lasts for up to one year after the last customer contact (the competition). If you do not wish to receive invitations, surveys, offers, etc. you can oppose such communication at any time, by contacting info@enjoywine.se or by following the unsubscribe link contained in each mailing

3.5. Whom we share your personal data with

We share your personal data with the IT services we use to receive and administer the contest contributions. Furthermore, your personal data is shared with the jury that assess your contribution.

Furthermore, your personal data is shared with the companies we use to send out surveys, invitations, and other communications.

We do not share your personal data with any third party unless we are obliged to do so by law. We will not sell your personal data to third parties for direct marketing, and we will not transfer your personal data to countries outside the EU/EEA.

4. Wine tastings (for consumers)

4.1. What personal data are we processing?

When you book one of our wine tastings, you need to provide us with your personal data, such as your name, address and e-mail address. If you make an advance payment, we will also process your account information.

4.2. Why do we process your personal data?

We process your personal data in order to handle your notification to the wine tasting in question, as well as to organize and administrate the wine tasting. Furthermore, your personal data is processed to communicate information about you before, under and after the wine tasting.

If you sign up for our newsletter (see section 1) or our magazine (see section 2), we will process your personal data in the manner described above.

Furthermore, we process your personal data with the purpose of sending you invitations to participate in various surveys, wine tasting, event invitations, and to announce offers and temporary launches on Systembolaget. If you do not wish to receive such communication, please contact info@enjoywine.se or follow the link contained in each mailing.

4.3. Legal basis

Our processing is based on the agreement you enter with us in connection with your notification to the wine tasting.

In case you sign up for our newsletter and/or newspaper when you submit your notification to the wine tasting we process your data based on the legal bases described in section 1 and section 2.

Our processing with the purpose of contacting you regarding surveys, invitations, offers, etc., is based on our legitimate interest. We believe that we have a legitimate interest in sending out such

communication to you as you have shown an interest in our business and the products we offer in connection with your notification to the wine tasting. We believe that our legitimate interest outweighs your interest of protection of your personal data. If you do not wish to receive such communication, please contact info@enjoywine.se or follow the link contained in each mailing.

4.4. Duration

We process your personal data until the event is completed. After that, your personal data will be processed for up to one year after the event has been completed.

In case your personal data appear in our financial statements, your personal data will be processed for this purpose for up to seven years after the end of the financial year in accordance applicable accounting legislation.

In case you have signed up for our newsletter or magazine, we process your personal data until you unsubscribe from the newsletter (withdraw your consent) or cancel your newspaper subscription (see section 1-2). However, it is only the personal data we need to send out the newsletter and/or the magazine that we will continue to process.

The processing based on our legitimate interest lasts for up to one year after the last customer contact (the wine tasting). If you do not wish to receive invitations, surveys, offers, etc. you can oppose such communication at any time, by contacting info@enjoywine.se or by follow the link contained in each mailing.

4.5. Whom we share your personal data with

We share your personal data with the IT services we use to administer the number of participants, as well as the event firms and/or PR companies we may use to arrange wine tasting.

Furthermore, your personal data is shared with the companies we use to send out surveys, invitations, and other communications.

We do not share your personal data with any third party unless we are obliged to do so by law. We will not sell your personal data to third parties for direct marketing, and we will not transfer your personal data to countries outside the EU/EEA.

5. Consumer surveys

5.1. What personal data are we processing?

We use different companies (third parties) to carry out different surveys on our behalf. When you are contacted due to such survey, it is not because you are in our registers but in the third party registers (usually because you have signed up as willing to participate in various surveys).

We process your data by contacting the third party company and when we send out a survey through them, which from the General Data Protection Regulation's perspective, means that we also process your personal data - and are thus the data controller.

5.2. Why do we process your personal data?

We process your personal data to be able to send out the relevant survey. We decide which survey we want to distribute, and which target group we want the survey sent to.

5.3. Legal basis

We process your personal data based on our legitimate interest. We believe that we have a legitimate interest to send out surveys (through third parties) related to our business and the products we offer in order to analyze, develop and streamline our business. Since you have signed up as willing to participate in third party surveys, we believe that your interests in protection of your personal data in this context do not outweigh our legitimate interest. If you do not wish to participate in future surveys, you can either contact us via info@enjoywine.se, or follow the link contained in each mailing.

5.4. Duration

Enjoy will only process your personal data until the survey is completed.

5.5. Whom we share your personal data with

We receive your personal data from the third party we use to distribute and compile the survey. We will not distribute your personal data to any third party unless we are obliged to do so by law. We will not sell your personal data to third parties for direct marketing, and we will not transfer your personal data to countries outside the EU/EEA.

6. When you contact us via social media or email any of our employees

6.1. What personal data are we processing?

When you contact any of our employees via e-mail, you provide your e-mail address, your name and any other personal data that your e-mail contains.

If you leave comments, like a post, etc. via Enjoy's Instagram, Facebook, YouTube Channel etc, you provide personal data in the form of name and any other personal data depending on your post / comment.

6.2. Why do we process your personal data?

We process your personal data to respond to your email, and/or comment / activity on social media.

In case your contact with relates to sections 1-9, we will process your email, post, comment, etc. in accordance with the legal grounds described there.

6.3. Legal basis

If your question/ comment/ post etc. cannot be attributed to any of the above described circumstances (sections 1-9), we process your personal data based on our legitimate interest in answering and responding to your questions, comments, etc. Since you initiated the dialogue, we believe that you can predict further treatment. Hence, we also believe that our legitimate interest outweighs your interest of protection of personal data.

6.4. Duration

If your contact with us relates to a relationship described in section 1-9, we will process your personal data for as long as it described in each section.

In case it is a general question to, without being attributable to any existing customer relationship and/or case, we will cease processing your personal data once we have answered your question. In

order to make it easier for you to come back with any additional questions, we will of course await further additional questions before we stop processing your personal information for this purpose.

6.5. Whom we share your personal data with

We use different IT services (e.g. our mailboxes). For natural reasons, your personal data is therefore shared with these providers. However, they cannot use your personal data in any way.

If you communicate with us through our social media channels, it means that the social media channel also has access to your personal data in accordance with the terms and conditions you approved when you created an account at the social media platform in question. In some cases, these platforms may be outside the EU/EEA.

We do not share your personal data with any third party unless we are obliged to do so by law. We will not sell your personal data to third parties for direct marketing.

7. Events

7.1. What personal data are we processing?

When you sign up for an event, you need to provide personal data such as name, gender, age, place of residence, drink preferences and how you usually buy your wine. According to applicable law, there is a 25-year limit for marketing alcoholic products. Hence, we must process data about your age.

During the event, pictures will be taken. If you can be identified on these pictures, we are processing your personal data.

7.2. Purpose and legal basis

We process your personal data to handle your event notification and arrange the event. Personal data processing is thus necessary to fulfill the obligations we have (to arrange the event) towards you.

In addition, we will publish the pictures taken during the events on our website, in our social channels, newsletters and in our magazine. Such publishing is made in market communication purpose. Any personal data processing due to the pictures from the event may be preserved and published only if you consent to such processing. You can withdraw your consent at any time, free of charge. If you wish to withdraw your consent, please contact info@enjoywine.se.

7.3. Duration

The personal data processing that takes place based on our agreement with you, will continue until the event is completed.

The processing based on your consent will last for as long as we have your valid consent. You can, at any time and free of charge, withdraw your consent by contacting info@enjoywine.se.

7.4. Vem delar vi dina personuppgifter med?

The pictures we use will be published in our social media platforms. Hence, the pictures will be processed by the platform, meaning that a company outside the EU/EEA (third country transfer) may process your personal data. The social media platforms we use are usually connected to the so-called Privacy Shield and is thus considered to have an adequate level of protection according to the EU Commission. This means that the companies that process your personal data can ensure the security of your personal data.

We do not share your personal data with any third party unless we are obliged to do so by law. We will never sell your personal data to third parties for direct marketing.

8. For customers and suppliers

8.1. What personal data are we processing?

We process personal data about those who are contact persons for our customer or supplier. Hence, we process the contact person's personal data e.g. name, e-mail address, telephone number and where this person works. When we refer to "your personal data" below, we refer to you as a contact person for the customer/supplier we work with in different ways.

8.2. Why do we process your personal data?

We need to process your personal data in order to communicate with the companies and suppliers we have different agreements with in order to fulfill the obligations we have undertaken due to the agreement. Hence, we need to process your personal data e.g. to send you the items you have ordered, receive payments and enter the payment into the books.

Since you are the contact person for the company/organization we are working with, we also process your data to send marketing, invitations to events, news, etc. to you.

8.3. Legal basis

The personal data processing that takes place to fulfill the obligations under our agreement with our customer or supplier is based on our agreement as a legal basis. The processing is necessary to fulfill our obligations. This basis covers such processing that occurs before, during and after the term of the agreement.

Our processing with the purpose of sending marketing, invitations, news, etc. to you is based on our legitimate interest. We believe that we have a legitimate interest in sending this information to you as a contact person for the customer/supplier with whom we have a current customer relationship. We also believe that you, as a represent for our customer/supplier, have an interest of receiving such communication. We believe that our legitimate interest in this context overweighs your interest of protection of personal data, since we have an existing customer relationship with the company you represent.

8.4. Duration

We process your personal data as long as the company/organization you represent has an active contractual relationship with us. We review our data once a year to ensure that only current personal data is processed.

In the event that you for any reason cease to be a contact person for our contractor, we will terminate our processing of your personal data as soon as we become aware of it.

In case your personal data (e.g. name) appears in our accounting records, your personal data will still be processed by us according to applicable law. Hence, such data will be processed for up to seven years after the end of the fiscal year, even though our contractual relationship has ceased or if you are no longer the represent for our contractual party.

The processing of personal data based on our legitimate interests continues for up to one year after our last customer contact with you. Thereafter our processing stops.

8.5. Whom we share your personal data with

Your personal data will be shared with the IT services we use to store customer/supplier agreements, manage orders, manage payments and bookkeeping, and the mailing tools we use to communicate marketing, news, events, and more.

Your personal data may also be shared within the corporate group we are part of.

We do not share your personal data with any third party unless we are obliged to do so by law. We will never sell your personal data to third parties for direct marketing, and we will not transfer your personal data to countries outside the EU/EEA.

9. (wine)journalists, Influencers and PR

9.1. What personal data are we processing?

If you are a (wine)journalist, Influencer or in a similar profession, we process your contact information. Your contact details often constitute personal data.

In some cases, you provide us with your data with a request to receive our press releases (usually during e.g. a trade fair or an event). In these contexts, you can also provide other personal data such as personal preferences – so that we can adjust our communication after your preferences.

In some cases, we have collected information about you through our own online research, and in some cases, we have purchased third party addresses. If we have received your data from a third party, the third party will be specified in each e-mail.

9.2. Why do we process your personal data?

We process your personal data to communicate with you in PR-purpose. Hence, we will e.g. send information about new products and their availability on Systembolaget. You may also receive invitations to various events.

9.3. Legal basis

When we purchase addresses to send information about our products, this is done based on our legitimate interest of marketing ourselves. We believe that you – in the light of your profession- are interested in receiving such information from us. Hence, we also believe that your interest of protection of your personal data in this context do not outweigh our legitimate interest.

In case you henceforth wishes to receive our communication mailings, we will request your consent to process your personal data with that purpose. In such cases, we will base our processing of your personal data on your consent, which you at any time, free of charge, may withdraw by contacting us at info@enjoywine.se.

If you have contacted us without any prior communication from us, we will process your personal information based on your consent. You can withdraw your consent at any time, free of charge, by emailing info@enjoywine.se.

9.4. Hur länge behandlar vi dina personuppgifter

In case we have received your personal data by purchasing it from a third party, we process your personal data for up to 24 months from the date of purchase. If you do not wish to receive any more emails from us, you are welcome to contact us by email at info@enjoywine.se. You can also unsubscribe or by follow the link you'll find in each mailing.

If you have given your consent to receive our communication, we will process your personal data during the time we have a valid consent from you. If you wish to withdraw your consent, please email info@enjoywine.se or follow the unsubscribe link contained in each email.

9.5. Whom we share your personal data with

We share your personal data with the service we use to create and distribute our communication.

We do not share your personal data with any third party unless we are obliged to do so by law. We will never sell your personal data to third parties for direct marketing, and we will not transfer your personal data to countries outside the EU/EEA.