

Privacy Policy

WE VALUE YOUR PRIVACY

We value the privacy of individuals who visit our website at <https://superwine.io/> (the "**Website**"), and any of our other applications, or services that link to this Privacy Policy (collectively, the "**Services**"). This Privacy Policy ("**Policy**") is designed to explain how we collect, use, and share information from users of the Services. This Policy is incorporated by reference into our Terms of Use. By agreeing to this Policy through your continued use of the Services, you agree to the terms and conditions of this Policy.

We hereby publish our data protection and data management principles, which we accept as binding.

Data of the Data Controller

The data controller is Superwine NL B.V. ("**Controller or Data Controller**")

Headquarters: Zuidplein 116, Tower One, 1077XV Amsterdam

Represented by: Bodri István Géza and Corpag Services (Netherlands) B.V. together

Customer service: info@superwine.io

The Data Controller is responsible for the preparation of this Privacy Notice (the "Notice"), for the enforcement of its contents, for the control and for the implementation of the necessary changes. The current version of this Privacy Policy is available at the Data Controller's registered office and on the website <https://superwine.io/> (hereinafter referred to as the Website).

WHAT TYPE OF INFORMATION WE COLLECT?

1. Data processed by the Data Controller

1.1 On the <https://superwine.io/> website operated by the data controller

The Data Controller carries out the following data processing activities in respect of users visiting the Website operated by the Data Controller (hereinafter referred to as "Data Subjects"):

Personal Data	Purpose of Data Processing	Legal Basis	Time of Data Processing
The data sent by the Data Subject in the text message	Contact, the primary purpose of which is the appropriate information, the information that may arise, questions that may arise, in an efficient and promptly answer; with each service information on the services provided, provision of information on the services.	The Data Subject is a volunteer consent, which is by sending the message by the Sender to the Data Controller.	The Data Subject does not request the processing of his/her data deletion, or withdraw his/her consent.

The Data Controller carries out the following processing activities in respect of the Data Subjects who subscribe to the newsletter:

Personal Data	Purpose of Data Processing	Legal Basis	Time of Data Processing
E-mail address of the Data Subject	To send newsletters to the Data Subject	The Data Subject's consent, provided by clicking	The Data Subject does not request the processing of his/her data deletion, or withdraw his/her consent.

Data Subjects may only provide their own personal data. If they do not provide their own personal data, the data provider is obliged to obtain the consent of the data subject.

Superwine operates the <https://superwine.io/> website, which provides the SERVICE.

If you choose to use our Service, then you agree to the collection and use of information in relation with this policy. The Personal Information that we collect is used for providing and improving the Service. We will not use or share your information with anyone except as described in this Privacy Policy.

The terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, which are accessible at <https://superwine.io/> unless otherwise defined in this Privacy Policy.

Information Collection and Use

For a better experience while using our Service, we may require you to provide us with certain personally identifiable information, including but not limited to your name, phone number, and postal address. The information that we collect will be used to contact or identify you.

Cookies

WE COLLECT COOKIES

To view the cookies we collect, please visit the following link to our cookie policy.

Privacy Policy of **Superwine NL**.

Cookies are files with a small amount of data that are commonly used as an anonymous unique identifier. These are sent to your browser from the website that you visit and are stored on your computer's hard drive.

Our website uses these "cookies" to collect information and to improve our Service. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your computer. If you choose to refuse our cookies, you may not be able to use some portions of our Service.

Service Providers

We may employ third-party companies and individuals due to the following reasons:

- To facilitate our Service;
- To provide the Service on our behalf;
- To perform Service-related services; or
- To assist us in analyzing how our Service is used.

We want to inform our Service users that these third parties have access to your Personal Information. The reason is to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose.

Superwine is not responsible for any uploaded content. We may take down uploaded content if it does not comply with our policies. It is important to understand that we do not store any NFT metadata. As soon as a non-fungible token is created, the NFT metadata is published onto the Elixír (ELXR) blockchain and we cannot take it down as it is on their chain. We do not have control over anything uploaded there. Please reach out to their team for any matters in this regard.

Security

We value your trust in providing us your Personal Information, thus we are striving to use commercially acceptable means of protecting it. But remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

Links to Other Sites

Our Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over, and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Children's Privacy

Our Services do not address anyone under the age of 18. We do not knowingly collect personal identifiable information from children under 18. In the case we discover that a child under 18 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do the necessary actions.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. Thus, we advise you to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately, after they are posted on this page.

Contact Us

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us at info@superwine.io.

Please find in the annex below the relevant information about your rights under the EU 2016/679 (General Data Protection Regulation or 'GDPR'):

YOUR RIGHTS AS A DATA SUBJECT (GDPR)

You have certain rights under applicable legislation, and in particular under Regulation EU 2016/679 (General Data Protection Regulation or 'GDPR'). You can find out more about the GDPR and your rights by accessing the [European Commission's website](#).

Right Information and access

You have a right to be informed about the processing of your personal data (and if you did not give it to us, information as to the source) and this Privacy Policy intends to provide the information. Of course, if you have any further questions, you can contact us on the above details.

Right to rectification

You have the right to have any inaccurate personal information about you rectified and to have any incomplete personal information about you completed. You may also request that we restrict the processing of that information. The accuracy of your information is important to us. If you do not want us to use your Personal Information in the manner set out in this Privacy Policy, or need to advise us of any changes to your personal information, or would like any more information about the way in which we collect and use your Personal Information, please contact us at the above details.

Right to erasure (right to be ‘forgotten’)

You have the general right to request the erasure of your personal information in the following circumstances:

- the personal information is no longer necessary for the purpose for which it was collected;
- you withdraw your consent to consent based processing and no other legal justification for processing applies;
- you object to processing for direct marketing purposes;
- we unlawfully processed your personal information; and
- erasure is required to comply with a legal obligation that applies to us.

HOWEVER, WHEN INTERACTING WITH THE BLOCKCHAIN WE MAY NOT BE ABLE TO ENSURE THAT YOUR PERSONAL DATA IS DELETED. THIS IS BECAUSE THE BLOCKCHAIN IS A PUBLIC DECENTRALIZED NETWORK AND BLOCKCHAIN TECHNOLOGY DOES NOT GENERALLY ALLOW FOR DATA TO BE DELETED AND YOUR RIGHT TO ERASURE MAY NOT BE ABLE TO BE FULLY ENFORCED. IN THESE CIRCUMSTANCES WE WILL ONLY BE ABLE TO ENSURE THAT ALL PERSONAL DATA THAT IS HELD BY US IS PERMANENTLY DELETED.

We will proceed to comply with an erasure request without delay unless continued retention is necessary for:

- Exercising the right of freedom of expression and information;
- Complying with a legal obligation under EU or other applicable law;
- The performance of a task carried out in the public interest;

- Archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, under certain circumstances; and/or
- The establishment, exercise, or defense of legal claims.

Right to restrict processing and right to object to processing

You have a right to restrict processing of your personal information, such as where:

- you contest the accuracy of the personal information;
- where processing is unlawful you may request, instead of requesting erasure, that we restrict the use of the unlawfully processed personal information;
- we no longer need to process your personal information but need to retain your information for the establishment, exercise, or defense of legal claims.

You also have the right to object to processing of your personal information under certain circumstances, such as where the processing is based on your consent and you withdraw that consent. This may impact the services we can provide and we will explain this to you if you decide to exercise this right.

HOWEVER, WHEN INTERACTING WITH THE BLOCKCHAIN, AS IT IS A PUBLIC DECENTRALIZED NETWORK, WE WILL LIKELY NOT BE ABLE TO PREVENT EXTERNAL PARTIES FROM PROCESSING ANY PERSONAL DATA WHICH HAS BEEN WRITTEN ONTO THE BLOCKCHAIN. IN THESE CIRCUMSTANCES WE WILL USE OUR REASONABLE ENDEAVOURS TO ENSURE THAT ALL PROCESSING OF PERSONAL DATA HELD BY US IS RESTRICTED, NOTWITHSTANDING THIS, YOUR RIGHT TO RESTRICT TO PROCESSING MAY NOT BE ABLE TO BE FULLY ENFORCED.

Right to data portability

Where the legal basis for our processing is your consent or the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, you have a right to receive the personal information you provided to us in a structured, commonly used and machine-readable format, or ask us to send it to another person.

Right to freedom from automated decision-making

As explained above, we do not use automated decision-making, but where any automated decision-making takes place, you have the right in this case to express your point of view and to contest the decision, as well as request that decisions based on automated processing concerning you or significantly affecting you and based on your personal data are made by natural persons, not only by computers.

Right to object to direct marketing ('opting out')

You have a choice about whether or not you wish to receive information from us. We will not contact you for marketing purposes unless:

You have a business relationship with us, and we rely on our legitimate interests as the lawful basis for processing (as described above) you have otherwise given your prior consent (such as when you download one of our guides)

You can change your marketing preferences at any time by contacting us. On each and every marketing communication, we will always provide the option for you to exercise your right to object to the processing of your personal data for marketing purposes ('opting-out') by clicking on the 'unsubscribe' button on our marketing emails. You may also opt-out at any time by contacting us on the below details. Please note that any administrative or service-related communications (to offer our services, or notify you of an update to this Privacy Policy or applicable terms of business, etc.) will solely be directed at our clients or business partners, and such communications generally do not offer an option to unsubscribe as they are necessary to provide the services requested. Therefore, please be aware that your ability to opt-out from receiving marketing and promotional materials does not change our right to contact you regarding your use of our website or as part of a contractual relationship we may have with you.

Right to request access

You also have a right to access the information we hold about you. We are happy to provide you with details of your Personal Information that we hold or process. To protect your personal information, we follow set storage and disclosure procedures, which mean that we will require proof of identity from you prior to disclosing such information. You can exercise this right at any time by contacting us on the above details.

Right to withdraw consent

Where the legal basis for processing your personal information is your consent, you have the right to withdraw that consent at any time by contacting us on the above details.

Raising a complaint about how we have handled your personal data

If you wish to raise a complaint on how we have handled your personal data, you can contact us as set out above and we will then investigate the matter.

You also have the right to lodge a complaint with the supervisory authority in the country of your habitual residence, place of work, or the place where you allege an infringement of one or more of our rights has taken place, if that is based in the EEA.