
PRIVACY POLICY

BACKGROUND:

Doolhof Wine Estates understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, <https://doolhof.co.uk/> ("Our Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy allows Doolhof Wine Estates to process all personal information that you supply to us.

8. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

| | |
|---------------------|---|
| "Account" | means an account required to access and/or use certain areas and features of Our Site; |
| "Cookie" | means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 14, below; and |
| "Cookie Law" | means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003. |

9. Information About Us

Our Site is owned and operated by Doolhof Wine Estates, a limited company situated in Wellington, South Africa.

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|--------------------------|--|
| Address: | Doolhof Wine Estate (Pty) Ltd P O Box 157 Wellington 7654 South Africa |
| VAT number: | 4290208737. |
| Data Protection Officer: | Clinton Waldeck. |
| Email address: | clinton@doolhof.com. |
| Telephone number: | +27 (0) 21 864 2805. |
| Postal address: | Doolhof Wine Estate (Pty) Ltd P O Box 157 Wellington 7654 South Africa. |

10. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to

other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

11. **What Is Personal Data?**

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

12. **What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 15.

13. What Data Do You Collect and How?

Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about our use of Cookies and similar technologies. We do not collect any 'special category' or 'sensitive' personal data or personal data relating to children or data relating to criminal convictions and/or offences.

| Data Collected | How We Collect the Data |
|--|--|
| Identity Information including name, title, date of birth, gender, identification number. | Newsletter sign up, Wine Club Sign up and the purchasing of wine order form. |
| Contact information including address, email address, telephone number. | Newsletter sign up, Wine Club Sign up and the purchasing of wine order form. |
| Business information including your business name. | Newsletter sign up, Wine Club Sign up and the purchasing of wine order form. |
| Payment information including card details and bank account numbers. | Purchasing of wine order form. |
| Profile information including preferences, login details, purchase history. | By accessing the website. |
| Technical information including HTTP status codes, Miscellaneous, Site Connection, Search Key phrases, Visitor Domain/Country, Hosts, Duration of Site Visit, Operating Systems, Browser Type. | Google Analytics. |

14. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we will use your personal data, and our lawful bases for doing so:

| What We Do | What Data We Use | Our Lawful Basis |
|--------------------------------------|---|---------------------|
| Registering you on Our Site. | Non-Special Personal Information (Address, e-mail, Gender, Nationality, Age, DOB) | Legitimate Interest |
| Providing and managing your Account. | Non-Special Personal Information (Address, e-mail, | Legitimate Interest |

| | | |
|---|---|---------------------|
| | Gender, Nationality, Age, DOB) | |
| Providing and managing your access to Our Site. | Non-Special Personal Information (Address, e-mail, Gender, Nationality, Age, DOB) | Legitimate Interest |
| Supplying our products and services to you. | Non-Special Personal Information (Address, e-mail, Gender, Nationality, Age, DOB) | Legitimate Interest |
| Managing payments for our products and services. | Non-Special Personal Information (Address, e-mail, Gender, Nationality, Age, DOB) | Legitimate Interest |
| Supplying you with information by email that you have opted-in-to (you may opt-out at any time by unsubscribing). | Non-Special Personal Information (Address, e-mail, Gender, Nationality, Age, DOB) | Legitimate Interest |

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email or telephone with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

15. How Long Will You Keep My Personal Data?

We will keep your personal information as long as your account is active or as long as it is needed to provide a service. We have so called retention policies for each of the categories of personal information that we process.

If you would like to cancel your account or for us to delete your data, we will only keep

information that we need for legal reasons, to resolve disputes or to enforce our agreements.

16. How and Where Do You Store or Transfer My Personal Data?

We will store some of your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data, such as South Africa, from where we import many of our products. For further information about adequacy decisions and adequacy regulations, please refer to the [Information Commissioner's Office](#).

Please contact us using the details below in Part 15 for further information about the particular data protection safeguards used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

17. Do You Share My Personal Data?

We may share your personal data with other companies in our group. This includes our holding company, RAB Capital, and its subsidiaries.

We may sometimes contract with the following third parties to supply certain products services.

| Recipient | Activity Carried Out | Sector | Location |
|-------------------------------|---|------------------------|--|
| London City Bond Ltd | Courier and freight services | Transport | United Kingdom |
| London City Bond Ltd - Duties | Courier and freight services | Transport | United Kingdom |
| AODesign | Website Design and Software Development | Information Technology | Republic of South Africa |
| Kriel & Co (Pty) Ltd | Management Consulting | Management Consulting | Worldwide, domiciled in the Republic of South Africa |

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the

law, as described above in Part 9.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 9.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

18. **How Can I Control My Personal Data?**

18.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details and by managing your Account).

18.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

19. **Can I Withhold Information?**

You may access Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 14.

20. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date

we receive your request. You will be kept fully informed of our progress.

21. **How Do You Use Cookies?**

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our products services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using Our Site, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. Third-party Cookies are used on Our Site for analytics purposes. For more details, please refer to the table below. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a banner/pop-up or similar, requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

The following first-party and third-party Cookies may be placed on your computer or device:

| Name of Cookie | Purpose | Category | Duration |
|--------------------------------------|---|-----------------|-----------------|
| wordpress_test_cookie | This cookie is used to check if the cookies are enabled on the users' browser. | Necessary | session |
| CookieLawInfoConsent | Records the default button state of the corresponding category & the status of CCPA. It works only in coordination with the primary cookie. | Necessary | 1 year |
| cookieLawInfo-checkbox-necessary | Set by the GDPR Cookie Consent plugin, this cookie is used to record the user consent for the cookies in the "Necessary" category. | Necessary | 1 year |
| cookieLawInfo-checkbox-functional | The cookie is set by the GDPR Cookie Consent plugin to record the user consent for the cookies in the category "Functional". | Necessary | 1 year |
| cookieLawInfo-checkbox-performance | Set by the GDPR Cookie Consent plugin, this cookie is used to store the user consent for cookies in the category "Performance". | Necessary | 1 year |
| cookieLawInfo-checkbox-analytics | Set by the GDPR Cookie Consent plugin, this cookie is used to record the user consent for the cookies in the "Analytics" category. | Necessary | 1 year |
| cookieLawInfo-checkbox-advertisement | Set by the GDPR Cookie Consent plugin, this cookie is used to record the user consent for the cookies in the "Advertisement" category. | Necessary | 1 year |
| cookieLawInfo-checkbox-others | Set by the GDPR Cookie Consent plugin, this cookie is used to store the user consent for cookies in the category "Others". | Necessary | 1 year |

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| _ga | The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors. | Analytics | 2 years |
| _gid | Installed by Google Analytics, _gid cookie stores information on how visitors use a website, while also creating an analytics report of the website's performance. Some of the data that are collected include the number of visitors, their source, and the pages they visit anonymously. | Analytics | 1 day |
| _gat_gtag_UA_110293534_1 | Set by Google to distinguish users. | Analytics | 1 minute |
| mc_session_ids[default] | This cookie is set by the provider ReCaptcha. This is used by the Captcha plugin for the website forms. | Functional | 5 minutes |
| mc_session_ids[multi][0] | This cookie is set by the provider ReCaptcha. This is used by the Captcha plugin for the website forms. | Functional | 5 minutes |
| mc_session_ids[multi][1] | This cookie is set by the provider ReCaptcha. This is used by the Captcha plugin for the website forms. | Functional | 5 minutes |
| mc_session_ids[multi][2] | This cookie is set by the provider ReCaptcha. This is used by the Captcha plugin for the website forms. | Functional | 5 minutes |
| mc_session_ids[multi][3] | This cookie is set by the provider ReCaptcha. This is used by the Captcha plugin for the website forms. | Functional | 5 minutes |
| mc_session_ids[multi][4] | This cookie is set by the provider ReCaptcha. This is used by the Captcha plugin for the website forms. | Functional | 5 minutes |

Our Site uses Google analytics services. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how Our Site is used. This, in turn, enables us to improve Our Site and the products and services offered through it.

The analytics service(s) used by Our Site use(s) Cookies to gather the required information. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable us to continually improve Our Site, making it a better and more useful experience for you.

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

22. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: clinton@doolhof.com.
Telephone number: +27 (0) 21 864 2805.
Postal address: Doolhof Wine Estate (Pty) Ltd
P O Box 157
Wellington 7654
South Africa.

23. **Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated in April 2022.

24. **Attribution**

This Privacy Policy has been created using a document template from www.simply-docs.co.uk.