

We at The Woodlab Distillery care about your privacy and we respect your privacy rights. The Woodlab Distillery has created this Privacy Policy to demonstrate our firm commitment to your privacy. The following outlines this commitment to users of our website, symphoniagin.com as we want to be able to provide everyone with a user experience that is safe and secure.

Symphoniagin.com endeavours to ensure that any personal data you give us via our website remains private and is used only for the purposes outlined in this Privacy Policy. By using the website, you acknowledge the collection and use of your personal data as outlined below.

About our privacy policy

This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us and your rights in relation to your personal data. If you are a client, this privacy policy supplements any data protection provisions contained in our contract with you and is not intended to override them. Please read the following carefully to understand our views and practices regarding your personal data, how we will treat it and your data protection rights.

Personal data we collect and process

When browsing and using website features, we will collect and gather the following categories of personal data:

- **Contact Data** such as address, e-mail address, telephone number.
- **Technical Data** such as internet protocol (IP) address, browser type and version, time zone setting, operating system and platform and other technology on the devices you use to access the website.
- **Usage Data** such as information about how you use the Symphonia Gin website.
- **Marketing and Communications Data** such as your preferences in receiving marketing communications from us and third parties and your communication preferences.

The type of personal data collected and used by us varies depending upon whether you are just browsing the website, or if you use one or more of Symphonia Gin website features.

We collect, use and share aggregated data such as statistical or demographic data. Aggregated data may be derived from your personal data but is not considered personal data under applicable data protection law as this data does not directly or indirectly reveal your identity.

How we collect personal data on the website

In order to contact us through the website, you will need to enter information such as, but limited to: email, First/Last name(s), telephone/mobile, which will involve you giving us your Identity, Contact details. We will inform you at the time of collecting personal data from you whether you must provide the personal data to use the website, or whether the provision of personal data requested by us is optional. We will inform you at the time of collection whether your personal data will be accessible to other users of the website or by third parties, so that you can decide whether to provide it.

We will receive Technical Data and Usage Data when you browse the Website. This is further explained below.

Methods used to collect personal data from and about you

Automated technologies or interactions: As you interact with the Website, we collect Technical Data and Usage Data including details of your device, browsing actions and patterns, traffic data, web logs and other communication data and the resources that you access. We collect this personal data by using cookies, tracking codes, server logs and other similar technologies. Please see our cookies policy for further details.

Third parties: We may receive personal data about you from various third parties as set out below

- Technical Data from providers such as Google Analytics and HotJar

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- To market certain material relating to the Website

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email. You have the right to withdraw your consent at any time by contacting us.

We do not request from you and we request you do not provide any special categories/sensitive personal data (e.g. personal data relating to racial or ethnic origin, political or religious opinions, membership of a trade union, physical or mental health or condition or sexual life or orientation). This type of personal data is subject to special protections under EU law.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your personal data. Please contact at ulrich@woodlabdistillery.com if you need details about the specific legal ground we are relying on to process your personal data.

We use your personal data in the following ways:

- We will collect and use Technical and Usage Data for data analytics purposes to improve the Website, products/services, marketing, user/Customer relationships and experience.
- We will collect and use Contact, Technical and Usage Data to communicate to users of the website via email about similar products or services from The Woodlab Distillery.
- We will collect and Contact, Technical and Usage Data to allow you to participate in interactive features on the website, when you choose to do so.

- We will collect and use Contact data, to manage our relationship with you which will include notifying you about changes to our website Privacy Policy to comply with a legal obligation.
- We will collect and use Identity; Contact and Technical Data to administer and protect our business and the Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) which is necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) and to comply with a legal obligation.

Marketing

We may use your Contact, Technical and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. You will receive marketing communications from us if you have requested information from us or purchased services from us [or if you provided us with your details when you entered a competition or registered for a promotion] and, in each case, you have not opted out of receiving that marketing. You can opt out of any marketing communications from us at any time by contacting us or by using the “Unsubscribe” function at the bottom of the marketing email we send you.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosure of personal data to others

Except as set out in this Privacy Policy, we do not disclose to any third party personal data that we collect or you provide to us. We may disclose your personal data to third parties expressly mentioned in this Privacy Policy and the following third parties:

- If at any time during your time as a user of the website, that you are happy to receive information or promotions from selected third parties about goods and services which may be of interest to you, we will send you such offers or information. See **Marketing** above on how to change your preferences;
- Any member of our group of companies, which means our subsidiaries, our ultimate holding company and its subsidiaries, where it is necessary to do so for the provision and administration of the services we provide to you;
- We contract with other entities that perform certain tasks on our behalf and who are under our control (“**Service Providers**”). This is required in order to provide and manage the website. Such Service Providers include IT systems suppliers and support, data storage, IT

developers, insurance, credit card companies, payment processors, analytics companies, website hosting providers and other service providers;

- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy;
- entities that regulate or have jurisdiction over symphoniagin.com. We will disclose your personal data in order to comply with any legal obligation, if we are ordered to do so by a court of competent jurisdiction, law enforcement, regulatory or administrative authorities or in order to enforce our agreements, or to protect the rights, property, or safety of The Woodlab Distillery, website users or others. This includes exchanging personal data with third parties for the purposes of fraud protection.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our Service Providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. Unless prevented by applicable law, we will notify you when your personal data may be provided to third parties in ways other than explained above, and you may have the option to prevent such sharing at the time that we notify you.

Data security

We are committed to protecting the personal data you provide us. To prevent unauthorised access or disclosure of personal data under our control, symphoniagin.com has appropriate security management systems in place to safeguard the personal data we collect. Firewalls, intrusion detection and virus scanners are used on all parts of the website. While The Woodlab Distillery makes reasonable efforts to protect all personal data, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, The Woodlab Distillery cannot ensure or warrant the security of any personal data you transmit to us, you do so at your own risk. **You acknowledge that we are not responsible for any intercepted information sent via the Internet, and you hereby waive, release and discharge us from any and all claims arising out of or related to the use of intercepted information in any unauthorised manner.**

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Website, you are responsible for keeping this password confidential. You must not to share your Website password with anyone.

Updating your personal data

It is important that the personal data we hold is accurate and current. Please keep us informed by using the Contact Us information below if any of your personal data changes during your relationship with us. It is your responsibility to keep your personal data up to date at all times.

IP addresses and cookies

We may collect information about your computer, including (where available) your IP address, operating system and browser type, for system administration and statistical purposes.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. On revisiting the Website our computer server will recognise the cookie, giving us information about your last visit. They help us to improve the Website and to deliver a better and more personalised service. They enable us:

- to estimate our audience size and usage pattern;
- to store information about your preferences, and so allow us to customise the Website according to your individual interests and make your usage of the Website more enjoyable; and

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the Website.

For more information about how our cookies work view our cookie policy.

For information on how to control your cookies go to www.allaboutcookies.org.

Data retention

We retain personal data for no longer than is allowed under data protection law and, in any case, no longer than such personal data is necessary for the purpose for which it was processed. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Also, we retain personal data for longer if required by applicable law or regulation or justified under applicable statutory limitation periods.

Your legal rights

Under certain circumstances you have rights under applicable data protection law in relation to personal data, namely:

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time if and to the extent we are relying on consent as the legal basis to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

In order to exercise one or more of your rights in respect of your personal data, please contact us at ulrich@woodlabdistillery.com. We will respond to your request(s) as soon as reasonably practicable, but in any case, within the legally required period of time.

You have the right to make a complaint at any time to the Data Protection Commission. We would, however, appreciate the chance to deal with your concerns before you approach the Data Protection Commission so please contact us in the first instance at ulrich@woodlabdistillery.com.

Changes to our privacy policy

Any changes we may make to our Privacy Policy in the future will be posted on this page, you may also be notified by email. You should visit this page periodically to review any changes to the Privacy Policy.

Contact us

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us using the following details: The Woodlab Distillery, Lisgobban Road, Benburb, CO. Tyrone, Northern Ireland, BT71 7PT or alternatively address your query by email ulrich@woodlabdistillery.com.