

Privacy and Cookie Policy

This policy describes the approach we take in protecting the personal data we process, providing data subjects (Website Users, Clients, Suppliers, and Candidates), whenever they are individuals, with information regarding the processing of their personal data, their rights concerning that data, and how they can exercise those rights, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council – General Data Protection Regulation (“GDPR”) and other applicable data protection and privacy legislation.

This policy may be supplemented with information about the processing of personal data carried out in the context of supplying products, offering services, or organising specific events and activities.

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1. Who is the Data Controller?

Will act as **Data Controller** any of the entities listed below, depending on the relationship you have with us and which, for the purposes of this policy and acting as such, will be indistinctly referred to as “**TFP**”:

- **The Fladgate Partnership - Vinhos, S.A.**; Company Registration No./Tax ID 503 818 127; Headquarters: Rua do Choupelo, n.º 250, 4400-008 Vila Nova de Gaia, Portugal
- **Quinta and Vineyard Bottlers - Vinhos S.A.**; Company Registration No./Tax ID 503 885 428; Headquarters: Rua do Choupelo, No. 250, 4400-088 Vila Nova de Gaia, Portugal
- **Heritage Wines - Distribuição de Bebidas, Lda.**; Company Registration No./Tax ID 506 312 542; Headquarters: Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal
- **Grossão - Comércio de Bebidas S.A.**; Company Registration No./Tax ID 503 087 300; Headquarters: Av. D. João II - Quinta dos Barões, 4430-022 Vila Nova de Gaia, Portugal
- **Grapes - Great Restaurant, Accommodation and Personalised Event Solutions, Lda.**; Company Registration No./Tax ID 509 335 721; Headquarters: Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal
- **Sociedade Agrícola de Nogueira, Lda.**; Company Registration No./Tax ID 501 746 803; Headquarters: Quinta da Roêda, 5085-036 Pinhão, Portugal
- **Três Séculos - Realizações Hoteleiras, Lda.**; Company Registration No./Tax ID 502 034 378; Headquarters: Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal
- **The Yeatman Hotel, Lda.**; Company Registration No./Tax ID 508 396 557; Rua do Choupelo, n.º 345, 4400-088 Vila Nova de Gaia, Portugal
- **Fladgate Partnership - Land Holdings, S.A.**; Company Registration No./Tax ID 500 301 905; Headquarters: Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal
- **HILODI - Historic Lodges & Discoveries, S.A.**; Company Registration No./Tax ID 513 165 096; Headquarters: Rua do Choupelo, 250, 4400-088 Vila Nova de Gaia, Portugal
- **The Vintage House Hotel, S.A.**; Company Registration No./Tax ID 503 974 242; Headquarters: Lugar da Ponte, 5085-034 Pinhão, Portugal
- **Y Not Chocolate, S. A.**; Company Registration No./Tax ID 514 990 848; Headquarters: Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal
- **Quinta and Vineyard Bottlers - Land Holdings, S.A.**; Company Registration No./Tax ID 500 227 969; Headquarters: Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal
- **Fontenova Hotel, Lda.**; Company Registration No./Tax ID 515 666 386; Headquarters: Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal
- **QVB SAN, Lda.**; Company Registration No./Tax ID 515 202 711; Headquarters: Quinta da Roêda, 5085-036 Pinhão, Portugal
- **Sociedade Quinta do Portal, S.A.**; Company Registration No./Tax ID 501 695 060; Headquarters: Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal

- **Fladgate Still & Sparkling Wines, S.A.**; Company Registration No./Tax ID 509 513 718 273; Headquarters: Rua do Choupelo, nº 250, 4404-509 Vila Nova de Gaia, Portugal
- **Quinta Colinas de São Lourenço, Lda.**; Company Registration No./Tax ID 502 215 535; Quinta “Colinas de São Lourenço”, São Lourenço do Bairro, 3780-191 São Lourenço do Bairro, Portugal
- **Quinta da Pedra, Lda.**; Company Registration No./Tax ID 501 407 200; Quinta da Pedra - Longos Vales, 4950-200 Monção, Portugal
- **Quinta de Bella Encosta, Lda.**; Company Registration No./Tax ID 509 585 043; Quinta de Bella, 3505-387 Viseu, Portugal
- **Ideal Drinks - Serviços e Distribuição, Lda.**; Company Registration No./Tax ID 509 584 713; Quinta do Seminário - Casais do Campo, 3045-161 Coimbra, Portugal
- **Fundação The Porto Protocol**; Company Registration No./Tax ID 515 488 011; Headquarters: Rua do Choupelo, nº 250, 4404-509 Vila Nova de Gaia, Portugal

‘Personal data’ means any information relating to an identified or identifiable **natural person** (‘data subject’).

2. Who are the data subjects?

- **Clients** – clients e others, to whom TFP provides products and/or services in course of its activities;
- **Suppliers** – partners, consultants, and service providers or any other entity that provides services to TFP, or, at its request, to its clients;
- **Candidates** – individuals who intend to apply for a job opportunity at TFP, or submit an unsolicited application to TFP, not related to a specific job offer;
- **Website Users** – any person who accesses any of TFP’s websites or the brands it markets:
 - www.fladgatepartnership.com**, managed by The Fladgate Partnership - Vinhos, S.A.;
 - www.climatechange-porto.com**, managed by The Fladgate Partnership - Vinhos, S.A.;
 - www.the-yeatman-hotel.com**, managed by The Yeatman Hotel, Lda.;
 - www.vintagehousehotel.com**, managed by The Vintage House Hotel, S.A.;
 - www.manorhousedouro.com**, managed by The Vintage House Hotel, S.A.;
 - www.quintadoportal.com**, managed by Quinta and Vineyard Bottlers - Vinhos, S.A.;
 - www.grapeshospitality.com**, managed by Grapes-Great Restaurant, Accommodation and Personalised Event Solutions, Lda.;
 - www.baraofladgate.com**, managed by Três Séculos - Realizações Hoteleiras, Lda.;
 - www.casadaspipasrestaurant.com**, managed by The Vintage House Hotel, S.A.;
 - www.tresseculos.pt**, managed by Três Séculos - Realizações Hoteleiras, Lda.;
 - www.dourorivertaxi.com**, managed by Três Séculos - Realizações Hoteleiras, Lda.;
 - www.clerigostastingroom.com**, managed by Três Séculos - Realizações Hoteleiras, Lda.;
 - www.barons-hall.com**, managed by Três Séculos - Realizações Hoteleiras, Lda.;
 - www.chafarizdelrei.com**, managed by Três Séculos - Realizações Hoteleiras, Lda.;
 - www.onwine.pt**, managed by Grossão - Comércio de Bebidas, S.A.;
 - www.directwine.pt**, managed by Grossão - Comércio de Bebidas, S.A.;
 - www.Taylor.pt**, managed by Quinta and Vineyard Bottlers - Vinhos, S.A.;
 - www.Fonseca.pt**, managed by Quinta and Vineyard Bottlers - Vinhos, S.A.;
 - www.Bin27port.com**, managed by Quinta and Vineyard Bottlers - Vinhos, S.A.;
 - www.Croftport.com**, managed by Quinta and Vineyard Bottlers - Vinhos, S.A.;
 - www.Croftpink.com**, managed by Quinta and Vineyard Bottlers - Vinhos, S.A.;
 - www.Croftbrandy.pt**, managed by Quinta and Vineyard Bottlers - Vinhos, S.A.;
 - www.portandtonic.com**, managed by Quinta and Vineyard Bottlers - Vinhos, S.A.;
 - www.Pittersporto.com**, managed by Quinta and Vineyard Bottlers - Vinhos, S.A.;
 - www.heritagewines.pt**, managed by Heritage Wines - Distribuição de Bebidas, Lda.;
 - www.wow.pt**, managed by Hilodi - Historic Lodges & Discoveries, S.A.;
 - www.miramira-porto.com**, managed by Hilodi - Historic Lodges & Discoveries, S.A.;
 - www.vintevintechocolate.pt**, managed by Y Not Chocolate, S.A.;
 - www.museudovitral.pt**, managed by Três Séculos - Realizações Hoteleiras, Lda.;
 - atkinsonmuseum.com**, managed by Hilodi - Historic Lodges & Discoveries, S.A.;
 - www.fladgategwines.com**, managed by Fladgate Still & Sparkling Wines, S.A.;
 - www.portoprotocol.com**, managed by Fundação The Porto Protocol

The TFP websites may occasionally contain links to websites and services of other companies, which have their own privacy policies, and/or services provided by third parties, installed on your device, may allow access to information contained therein. Therefore, we recommend that you carefully read the privacy policies of these third parties. TFP is not responsible for the practices or content of these privacy policies.

TFP websites provide you, in certain circumstances, social plugins from various social networks. If you choose to interact with a social network such as Facebook or Google (for example, through account registration), your activity on our Website or

application will also be available to the respective social network. If you are logged into one of these social networks during your visit to our Website or application or if you are interacting through one of the aforementioned social plugins, the social network may include this information in your profile on that social network, in accordance with your privacy settings. If you want to avoid this type of data transfer, log out of your social network account before entering our Website or application, or change your privacy settings whenever possible. We recommend reading the privacy policies of the social networks you use to obtain detailed information about the collection and transfer of personal information, to understand your rights, and to know which privacy settings are appropriate for your profile that you should select

3. What kind of information we collect?

TFP collects various types of personal data depending on different purposes, such as, namely:

Customer data: we process the data necessary for the preparation, fulfilment and execution of any contract entered into between the Customer and TFP, as well as to manage any potential complaints. Depending on the relationship you have with us, considering our different business areas, identification and contact data may be processed (name, phone/mobile number, email address, address and postal code; date of birth, place of birth, nationality, birthday; type, number and expiry date of identification document; gender, profession, information about household members; language); financial and banking data (tax identification number, IBAN/NIB, credit card data), billing and product delivery data, reservation data (number, dates, room number, payment information), customer/registration number, data related to purchases and/or interest in the products and/or services we market, type and number of loyalty program card (*WOW Card, The Yeatman Wine SPA Private Club, Onwine Club*); ticket number, car make and license plate, parking space and date of vehicle parking, if you request the valet parking service at the facilities where we provide it. We also hold information related to your online engagement, which we use to ensure that the marketing communications we send you are relevant to you, in accordance with the consent you have given us. We may also process information that you, directly or through someone from your company, have decided to share with us (evaluation of our services and products, allergies, physical and health conditions, and dietary restrictions), as well as, if you visit our premises, images captured by the video surveillance system (CCTV), identification data, vehicle registration number, and the reason for your visit;

Supplier data: we process the data necessary for the preparation, fulfillment, and execution of any contract entered into between the Supplier and TFP, as well as to manage any potential complaints. In this context, we handle the data of contact persons or individuals representing the supplier or service provider, such as names, addresses, telephone numbers, and email addresses. We will also process financial and banking data to facilitate payments to you. We may also process information that you have decided to share with us, either directly or through someone from your company, as well as, if you visit our premises, images captured by the video surveillance system (CCTV), identification data, vehicle registration number, and the reason for your visit;

Candidate data: depending on the relevant circumstances, we may collect all or part of the following information:

- Data included in the candidate's CV:
 - identification data, such as name, contact details (telephone, address, email), and photograph;
 - data regarding professional status and activity;
 - data relating to academic and professional training;
- Additional information that you choose to share with us, namely through your CV and in interviews;
- Images captured by the video-surveillance system (CCTV), identification data, car registration number and the reason for your visit, if you come to our premises;

Website User data: we process the data necessary to ensure a good experience when using the Website, enabling you to take advantage of all its features, as well as for effective management of the services we provide. This includes information about how you use our Website, how often you access it, your browser type, your IP address, the location from which you access our Website, the language you choose to view it in and the hours when our Website is most popular, as well as other information better described in our cookie policy below. If you contact us through the Website using, for example, the *chat* feature, we will collect any information you provide, such as your name and contact details.

Additionally, if you register on TFP Website through social networks (which involves using your credentials on these networks, such as your Facebook or Google login information, to create your TFP account and log in with it), we will also collect personal data. When you use the login option via social networks, TFP will only use the public profile information that is necessary to create your TFP account. Once the account is created, you will have the opportunity to complete it with additional information that you choose to share with us. Any additional information you provide will only be used for the purposes mentioned in this policy.

3.1. Am I obliged to provide my data?

In the context of the relationship you have with us (e.g. commercial), you must provide the personal data necessary to establish and manage that relationship, as well as to fulfill obligations and pre-contractual and contractual diligences derived from it, and also the data we are legally required to collect. Without this data, we will generally have to refuse to enter into or perform the contract, or we will not be able to maintain the contract, having to terminate it.

If you do not provide us with the necessary information and documentation, we will not be able to establish or continue the commercial or employment relationship you intend or follow up on the requests you send you address to us.

3.2. How do we collect your personal data?

We may collect personal data in various ways: personal data that we receive directly from you if you contact us on your own initiative, usually by telephone, email or through a form on our Website; and/or if we contact you by telephone or email, or through business development activities more generally.

There are various ways in which you can share your information with us, which include:

- Entering your data in the forms available on our websites, for contact and information, registration for events, courses, masterclasses and workshops, WSET® qualification courses, educational services activities, gatherings or initiatives we promote;
- Sharing your data to join loyalty programs;
- Purchasing tickets for museums, experiences and visitor centers;
- Booking and purchasing products and/or services;
- Subscribing to newsletter;
- Participation in contests through a social network, such as *Facebook*, *X*, *Instagram*, *TikTok* or other;
- Through the chat feature on our Website;
- Sending your resume by email or delivering a resume in paper form.

We will also process personal data transmitted by third parties, namely from social networks, if you 'follow' us and/or make a 'like' on our pages of *Facebook*, *Instagram*, *X*, *LinkedIn*, *TikTok*, *Pinterest*, *Flickr* or *YouTube*.

We collect your data automatically through cookies, in accordance with your consent and the cookie settings of your browser. Please see our **Cookie Policy** below.

4. Why do we process your personal data and on what legal basis?

4.1. Management of the relationship with clients and potential clients

- Creation and management of client accounts;
- Management of the contractual relationship and/or pre-contractual diligences;
- Management of order shipments;
- Communication with the client, namely to assist with aspects related to support and clarification of questions that are submitted to us;
- Complaint management;
- Sending reminders related to bookings/reservations, changes in order status, abandoned cart, and stock notification information;
- Management of loyalty programs, such as, namely, the "WOW Card", "The Yeatman Wine SPA Private Club" and 'Clube Onwine' programs;
- Monitoring of service quality;
- Safety of persons and property.

4.2. Supplier relationship management

- Creation and management of supplier account;
- Performance of a contract and/or pre-contractual diligences;
- Complaint management;
- Service quality monitoring;
- Safety of persons and property.

4.3. Marketing and communication activities

- Based on your consent or your relationship with TFP, as applicable, we will send you newsletters or specific promotional communications by email and/or SMS, which may contain information about campaigns, events and activities, courses and workshops, masterclasses, discounts, promotions, offers and benefits, invitations, participation in contests and prize draws, actions to promote new features, new products or services, including personalized information according to the preferences you have indicated to us;
- Obtaining aggregated statistics related to the language and country of origin of newsletter subscribers, for the improvement of communication and marketing strategies;
- Sending information about personalized and exclusive offers of products and services identified on the basis of your personal preferences and behaviour, namely by using products and/or services and browsing on TFP websites.

You may unsubscribe from newsletters and/or promotional communications at any time by using the option provided for this purpose in each communication sent.

If you do not agree with our marketing approach, you have the right to withdraw your consent at any time, without this affecting the lawfulness of processing based on consent previously given.

We may use your data to show you ads from TFP and other content on other websites, such as *Facebook*. If you do not want us to use your data in this way, disable the marketing/advertising/targeting cookies option (see our **Cookie Policy** below).

4.4. Development of products and services

TFP may use your personal data for the development of its products and services. However, we will predominantly use aggregated data and statistical information.

TFP keeps track of the pages you visit on our website to determine which services/products are most requested. In this case, information is collected regarding the computer or mobile device you use to access the website, namely your IP address, the website through which you accessed ours, the type and language of your browser, operating system, cookies, the country from which you are accessing, referring and exit pages, URL, platform type, the number of clicks made, domain names, landing pages, pages visited and the order in which you visited them, the time spent on a particular page, the date and time you accessed the website, access errors and other similar information that your browser sends us.

4.5. Improvement of the services provided to the User

Your data related to your purchases may be used, in a statistical and aggregated form, for purposes of analysis, market research and quality surveys.

4.6. Recruitment activities

To fill vacancies, we may develop recruitment activities internally. For this purpose, we may carry out various personal data processing, such as:

- Store your data (and update it when necessary) in our database so that we can contact you regarding recruitment;
- Evaluate data about you in relation to the vacancies we consider suitable for you;
- Allow you to send your CV, apply online to job offers or subscribe to job offers alerts;
- Comply with our obligations arising from any contracts entered into between TFP and third parties, regarding your recruitment;
- Fulfil our legal obligations, including specifically regarding crime detection or tax and fiscal duties collection.
- Capture images on the video surveillance system (CCTV), process your identification data (name), your car registration number as well as the reason for your visit, if you come to our premises;

4.7. Others purposes

- Compliance with legal obligations;
- Declaration, exercise or defence of rights or interests;
- Processing images captured through video-surveillance system (CCTV) for the safety of people and property;
- Prevention and investigation of possible misuse of your personal data.

4.8. On what legal grounds do we process your personal data?

The legal basis for the processing of personal data are as follows:

- **Performance of a contract or pre-contractual diligences:** client account, supplier account, supply/acquisition of products and/or services, training and certified courses, provision of spaces, communications to provide you with requested information and/or confirm or not your Website registration request;
- **Consent:** marketing and other forms of communication not included in the previous point, except where legally permitted; profiling; processing of minor's data, when this is the applicable legal basis; activities within the scope of the recruitment process; processing of health data;
- Pursuit of TFP's **legitimate interest:** development of products and improvement of the service provided; information about "abandoned carts"; service quality control; safety of persons and property on TFP premises; protection of TFP's interests and rights;
- **Compliance with legal obligations:** namely tax obligations and/or anti-money laundering obligations.

5. With whom do we share your personal data?

When appropriate and in accordance with local laws and requirements, we may share your personal data in various ways and for various reasons with the following categories of recipients:

- Any of the entities listed in Heading 1 above, for administrative purposes;
- Entities to whom TFP is legally or contractually obliged to do so;
- Third-party service providers who perform functions on our behalf (including external consultants, business partners and professional advisors such as lawyers, auditors and accountants, recruitment companies, technical support functions and IT consultants who conduct testing and development work on the technology systems of the entities listed in Heading 1);
- Third-party IT service providers and outsourced document storage services, in cases where we have an appropriate data processing agreement (or similar protections);
- Platforms and suppliers of marketing technology; management software;
- Transport and delivery companies, for shipping product orders;
- WSET® – Wine & Spirit Education Trust organization, for the registration and certification of WSET® courses run by TFP (The Wine School WOW courses);

- For marketing communication purposes, provided you have given your consent, personal data may be transmitted to entities of the same Group, legal or economic, listed in Heading 1 above, as well as to other third parties, which are duly identified at the time of the request for consent. These entities will act as data controllers;
- In the event of the acquisition or alienation of businesses or assets, we may share your personal data with potential buyers of those businesses or assets;
- In the event of payments, the credit institutions and other payment service providers, as well as the technology service providers related to payment services to whom the transaction data is passed on, and which may be bound by legislation of the State in where they perform, or by agreements concluded by the latter to provide information on transactions to official authorities of other countries, both inside and outside the European Union, in the battle against financing terrorism, serious forms of organized crime and money laundering prevention.

6. How do we safeguard your personal data?

We are committed to taking all reasonable and appropriate measures to protect the personal information we hold from misuse, accidental or unlawful amendments, loss and unauthorised disclosure or access. For this purpose, TFP uses security systems, rules and other procedures to ensure the protection of your personal data, as well as to prevent unauthorised access to data, improper use, disclosure, loss or even destruction of your personal data.

If you suspect misuse, loss or unauthorised access to your personal information, please let us know immediately.

7. How long do we keep your data?

- We only retain your personal data for the time necessary for the purposes for which it is processed, to respond to your needs or to the requests you may address to us, to comply with our contractual and legal obligations, for the respective applicable statutory limitation or expiration periods;
- When you have consented to the sending of direct marketing, we will keep your personal data while maintaining the determining purpose of the data collection or until you cancel the subscription or request us to delete the data;
- Until consent is withdrawn, when this is the legal basis for the data processing;
- Regarding the images captured through video-surveillance system (CCTV), for thirty [30] days;
- Regarding the use of cookies, we will keep them as long as it is necessary to achieve the purposes inherent thereto, or until consent is withdrawn, as detailed in the Cookie Policy below;
- The period of time provided for in applicable legislation, namely in tax legislation, or
- Until the specific purpose applicable to certain data processing ceases to exist;
- We may retain some of your personal data to the extent necessary to comply with our legal obligations, as well as to exercise or enforce our rights, including to appeal to courts and administrative entities;
- In any of these situations, if there legal judicial or administrative proceedings are pending, the data will be kept for the duration of the proceedings and up to six [6] months after a final *res judicata* judgment is rendered.

After the retention periods mentioned above, the personal data will be deleted and /or erased in a completely secure manner.

8. What are your rights as a data subject?

The data subject has the right to obtain clear, transparent and complete information about how TFP processes their personal data. That is why we made this Privacy Policy available to you.

Under the applicable legislation, the data subject may exercise, at any time, the right to access, rectify or erase their personal data, as well as the right to restrict the processing of such data. Where appropriate, they also have the right to object to the processing or request data portability.

In cases where personal data processing is carried out on the basis of your consent, you may withdraw that consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

You have the right to lodge a complaint with a supervisory authority if you consider the processing of personal data related to you infringes the data protection legislation. In Portugal the relevant supervisory authority you can complain to is the *Comissão Nacional de Proteção de Dados – CNPD* (www.cnpd.pt).

9. How can you exercise your rights / How can you contact us?

To exercise any of the above rights or clarify any questions regarding our privacy policy, please contact us by letter or email, providing proof of your identity and indicating the right you wish to exercise, by letter or email, at the following addresses:

- **The Fladgate Partnership - Vinhos, S.A.**, A/C. Encarregado de Proteção de Dados, Rua do Choupelo, n.º 250, 4400 - 088 Vila Nova de Gaia, Portugal; email: dpo@fladgatepartnership.com
- **Quinta and Vineyard Bottlers - Vinhos S.A.**, A/C. Encarregado de Proteção de Dados, Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal; email: dpo@qavb.com
- **Heritage Wines - Distribuição de Bebidas, Lda.**, A/C. Encarregado de Proteção de Dados, Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal; email: dpo@heritagewines.pt

- **Grossão - Comércio de Bebidas, S.A.**, A/C. Encarregado de Proteção de Dados, Avenida D. João II – Quinta dos Barões, 4430-022 Vila Nova de Gaia, Portugal; email: dpo@grossao.com
- **Grapes - Great Restaurant, Accommodation and Personalised Event Solutions, Lda.**, A/C. Encarregado de Proteção de Dados, Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal; email: dpo@grapeshospitality.com
- **Sociedade Agrícola de Nogueira, Lda.**, A/C. Encarregado de Proteção de Dados, Quinta da Roêda, 5085-036 Pinhão, Portugal; email: dpo@san.pt
- **Três Séculos - Realizações Hoteleiras, Lda.**, A/C. Encarregado de Proteção de Dados, Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal; email: dpo@tresseculos.pt
- **The Yeatman Hotel, Lda.**, A/C. Encarregado de Proteção de Dados, Rua do Choupelo, n.º 345, 4400-088 Vila Nova de Gaia, Portugal; email: dpo@theyeatman.com
- **Fladgate Partnership - Land Holdings, S.A.**, A/C. Proteção de Dados, Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal; email: dpo@fladgatepartnership.com
- **HILODI - Historic Lodges & Discoveries, S.A.**, A/C. Encarregado de Proteção de Dados, Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal; email: dpo@wow.pt
- **The Vintage House Hotel, S.A.**, A/C. Encarregado de Proteção de Dados, Lugar da Ponte, 5085-034 Pinhão, Portugal; email: dpo@vintagehousehotel.com
- **Y Not Chocolate, S.A.**, A/C. Proteção de Dados, Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal; email: dpo@vintevintechocolate.pt
- **Quinta and Vineyard Bottlers - Land Holdings, S.A.**, A/C. Proteção de Dados, Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal; email: dpo@fladgatepartnership.com
- **Fontenova Hotel, Lda.**, A/C. Proteção de Dados, Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal; email: dpo@fladgatepartnership.com
- **QVB SAN, Lda.**, A/C. Proteção de Dados, Quinta da Roêda, 5085-036 Pinhão, Portugal; email: dpo@fladgatepartnership.com
- **Sociedade Quinta do Portal, S.A.**, A/C. Proteção de Dados, Rua do Choupelo, n.º 250, 4400-088 Vila Nova de Gaia, Portugal; email: dpo@fladgatepartnership.com
- **Fladgate Still & Sparkling Wines, S.A.**, A/C. Proteção de Dados, Rua do Choupelo, n.º 250, 4404-509 Vila Nova de Gaia, Portugal; email: dpo@fladgatewines.com
- **Quinta Colinas de São Lourenço, Lda.**, A/C. Proteção de Dados, Quinta “Colinas de São Lourenço”, São Lourenço do Bairro, 3780-191 São Lourenço do Bairro, Portugal; email: dpo@fladgatewines.com
- **Quinta da Pedra, Lda.**, A/C. Proteção de Dados, Quinta da Pedra - Longos Vales, 4950-200 Monção, Portugal; email: dpo@fladgatewines.com
- **Quinta de Bella, Lda.**, A/C. Proteção de Dados, Quinta de Bella, 3505-387 Viseu, Portugal; email: dpo@fladgatewines.com
- **Ideal Drinks - Serviços e Distribuição, Lda.**, A/C. Proteção de Dados, Quinta do Seminário - Casais do Campo, 3045-161 Coimbra, Portugal; email: dpo@fladgatewines.com
- **Fundação The Porto Protocol**, A/C. Proteção de Dados, Rua do Choupelo, n.º 250, 4404-509 Vila Nova de Gaia, Portugal; email: dpo@fladgatepartnership.com

10. International data transfers

Data transfer to other countries (countries outside the European Economic Area) only occurs if it is necessary for the execution of orders or upon your requests (for example, payment orders or shipment of products), by legal requirement or if you have given us an express authorisation to do so. If requesting service providers of third countries is required, they will be obliged to comply with the written instructions in this regard by signing an agreement with the standard contractual clauses of the European Union, in order to comply with the level of data protection applicable in the European Union. You will receive detailed information from us separately as required by law.

We want to ensure that your data is stored and transferred in a safe way. Therefore, we will only transfer data outside the European Economic Area or EEA (*i.e.*, all the European Union Member States as well as Norway, Iceland and Liechtenstein) where this is in line with the data protection legislation and the means of transfer provide adequate guarantees in relation to your data, namely:

- through a data transfer agreement incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to controllers and subcontractors in jurisdictions lacking adequate data protection legislation; or
- transferring your data to a country where the European Commission has noted an adequate level of data protection; or
- If you have consented to the transfer of data.

To ensure that your personal data receives an adequate level of protection, we have applied appropriate procedures with third parties with whom we share your personal data to guarantee that your personal information is handled by such third parties in compliance with data protection law.

11. Guarantees and warnings

The data subject guarantees that the personal data provided to TFP are correct and accurate and will notify any change or amendment to them assuming sole responsibility for losses and damage caused by erroneous, inexact or incomplete communication of these data. The data subject is explicitly warned that when disclosing personal data on TFP's public media such as *Facebook, Instagram, X, LinkedIn, Tiktok, Pinterest, Flickr* or *YouTube*, this information may be seen and used by third parties.

11.1. Recommended browsers for optimised viewing of the Website

TFP websites are optimised for viewing on *Google Chrome, Safari, Mozilla Firefox* and *Microsoft Edge*.

12. COOKIE POLICY

12.1. What are Cookies?

They are small text files that a website, through your web browser, stores on your computer or other device you use to access the Internet. They allow websites to function more efficiently and in a more personalised way, improving your online experience. For example, when you visit an online shopping website, cookies not only allow your individual preferences to be 'remembered', but can also 'remember' your user and login status, the items in your shopping cart, and much more.

Cookies can be of different types and have different specific functions. In general, the cookies we use can be:

- Considering its duration:
 - **Session cookies:** are temporary and expire automatically when you close your web browser;
 - **Persistent cookies:** remain in your web browser until the date set for their expiry, or until they are deleted. The period until expiry varies per cookie, with some expiring after a few minutes, while others only expire after several days or even years.
- Considering its origin:
 - **First-party cookies / Own cookies:** are installed directly by our *Website* when you visit it;
 - **Third-party cookies:** are installed and managed by third-party entities, who may therefore have access to the data collected by the cookies they install. The use of cookies by third parties is subject to the privacy and cookie policies of those entities, which we advise you to consult and to which TFP is not bound.
- Considering its purpose:
 - **Strictly necessary cookies:** are essential for the Website to function properly, allowing you to navigate and use its features correctly, such as accessing secure areas of the Website by logging in. Without them, we cannot give you access to the main features of the Website and/or the features you have explicitly requested;
 - **Preference or functionality cookies:** allow us to 'remember' your preferences for browsing the Website, such as your preferred language or the region and time zone you are in, so that you do not need to reconfigure and customise it each time you visit. You can control and restrict this type of cookie through your Internet browser settings, but this restriction may the functionalities of the Website;
 - **Statistics, performance or analytics cookies:** are used to collect statistical information that allows us to analyse how you use the Website, such as which pages are most or least visited, which content you engage with most and for how long, page loading speed and error messages displayed. This makes it possible to evaluate the performance of the Website, with a view to constant updating and improvement, and to tailor the content to the preferences and needs of those who visit it. The information collected by these cookies is stored in an aggregate form;
 - **Marketing, advertising or targeting cookies:** are used to direct advertising according to your interests and help measure the effectiveness of advertising.

12.2. Cookie consent

Under applicable law, with the exception of strictly necessary cookies, which are stored on your computer or mobile device immediately upon your visit to the Website, the use and storage of other cookies depends on your prior and express consent. Please note that rejecting the use of cookies may affect the quality of your experience on the Website.

12.3. How can you manage your Cookie preferences?

You can manage your cookie preferences at any time. Most Internet browsers, through their configuration options, allow you to control the storage of cookies on your computer or mobile device, as well as the immediate deletion of those that have been previously installed on that device.

If you wish to have greater control over the installation of cookies, you can use programs or add-ons to your Internet browser, known as "do not track" tools, which will allow you to choose which cookies you want to permit.

Rejecting the use of cookies on TFP websites may restrict or prevent access to certain areas and/or content on those web pages or limit the receipt of personalised information.

13. Establishment, exercise or defence of legal claims

Occasionally, it may be necessary to process personal data and, where appropriate and in accordance with local requirements and legislation, to process sensitive personal data regarding the exercise and defence of legal claims. On this perspective, article 9 paragraph 2 f) of GDPR allows such processing when it “is necessary for the establishment, exercise and defence of legal claims in a judicial proceeding or whenever courts act in the exercise of their judicial function.”

This may arise, for instance, in circumstances where we need to obtain legal advice in relation to legal proceedings or if we are required by law to retain or disclose specific information as actors in legal proceedings.

14. Changes to this Privacy Policy

TFP reserves the right to change this Privacy and Cookies Policy at any time, and any changes will be duly posted on the TFP's websites. If the changes are materially relevant, a notice will be published.

Last update: 22 September 2025