

1. Privacy policy

We attach great importance to the protection of your personal data. DIWISA Distillerie Willisau SA processes your personal data subject to the Swiss Federal Act on Data Protection (DPA) and other applicable provisions on data protection.

The present Privacy Policy tells you about the way in which DIWISA Distillerie Willisau SA (referred to below as 'We' or 'Us') collects and uses personal data on and from Our websites (referred to below as 'Websites'), as well as the scope and purpose of that collection and use. It also gives you information about your rights. These rights are governed by the applicable data protection legislation. You may therefore have more wide-ranging rights than are laid down in this privacy directive, or certain rights may not be available to you.

The underlying reason that your data is processed for the purposes laid down in this Privacy Policy is to fulfil contracts (such as those connected with Our offer of goods and services, or the provision of newsletter services), and to serve Our legitimate interests (such as those associated with an analysis of the use of our Website, in order to optimise our processes and procedures).

2. Responsibility for data processing

Unless stated otherwise in this Privacy Policy, the following is responsible for data processing in connection with the Websites, and is also the point of contact for data protection-related matters:

DIWISA Distillerie Willisau SA
Menznauerstrasse 23
6130 Willisau
Tel.: +41 41 972 72 72
e-mail: privacy@diwisa.ch

3. Data collection from the Websites

3.1 Log files

When you use Our Websites, information is automatically collected and stored in log files which the browser on your device then transmits to Us. This information covers:

- Your computer's IP address and operating system
- Browser type, version and language
- Name of the IP address domain owner (usually your internet access provider)
- Date and time of the server query
- Website from which Our Website was accessed (referrer URL), poss. with the search term that was used
- Status code (e.g. an error message)
- Browser used by you (type, version and language)
- Transfer protocol used (e.g. HTTP/1.1)



- Ad ID
- Events and event targets set by tags
- Subpages and links that you have clicked on

We collect your personal data to allow Us to optimise the products and services We offer, as well as our processes and procedures, in particular in connection with the use of Our Websites and with system security and stability.

3.2 Goods orders

You can order goods either as a customer, with a corresponding customer account, or as a guest, via Our Online Shop, www.drinkdirect.ch.

We require the following information to set up a customer account:

- Title
- First name and surname
- Company name
- Telephone number and e-mail address
- Date of birth
- Password

The following information is also collected when goods are ordered:

- Residential address
- Payment information, such as credit card details

We use this data to receive and process orders, to deliver products and services, to process payments and to communicate with you about orders.

During the ordering process, the data is SSL-encrypted before it is transmitted via the internet. We do not store credit card details ourselves. These are collected and processed directly by our payment partner.

3.3 Newsletter

If you would like to subscribe to the newsletter that We offer on Our Websites, We will need your e-mail address. We use this to send you the newsletter, for statistical analyses, and to optimise the newsletter itself.

To do this, We measure and analyse how often the newsletter is opened, as well as which links the reader clicks (newsletter tracking).

You can opt out of receiving the newsletter at any time. An 'unsubscribe' link is included in every edition.



3.4 Contacting Us

When you contact Us (by e-mail, for example), the information you provide will be processed in order to handle your enquiry, and in case there are any follow-up questions. This information is usually the following:

- Title
- First name and surname
- e-mail address
- Telephone number
- Content of your message

This data is deleted when We no longer require it to process your enquiry, or when you ask Us to do so.

3.5 Use of cookies and tracking tools

On Our Websites, We use both Our own and third-party cookies, including tracking tools. Cookies are small files that are stored by your browser on your device. Most of the cookies We use are deleted automatically when you leave Our Websites. Other cookies remain stored on your device until you delete them. These cookies allow Us to recognise your browser the next time you visit, to analyse how you use the Websites, and to present adverts that reflect your particular interests, on social media, for example.

Where cookies or tracking tools from third-party providers such as Google or Facebook are used, it is possible that your browser will automatically establish a direct connection with the servers of these third-party providers. The scope and onward use of the data that is collected by the use of these third-party provider tools is beyond our control. It is possible that, in this connection, your IP address in particular will be transmitted to servers that are located outside the EU.

In your browser settings, you can determine that you will be notified in advance of the use of cookies, so that you can decide in each individual case whether you want to reject cookies in particular instances or in general. You can also choose to block cookies entirely. Please note that certain functions on Our Websites may not work if you have deactivated the use of cookies.

4. Links

Our Websites may contain links to sites run by third parties. We are not responsible for the content of or data protection precautions taken by external sites which you are able to access via links. When leaving our Websites, please find out about data protection on the site in question directly.



5. Forwarding of data to third parties

5.1 Outsourcing

We work with a variety of service providers to enable Us to offer you Our goods and services. Examples include:

- IT service providers, so that our infrastructure is up to date, as well as for dispatching the newsletter;
- Payment partners, to handle the payment process (e.g. financial institutions, payment services) for orders;
- Logistics firms, such as delivery services, to enable Us to deliver our products;
- Collection services and credit agencies, to the extent necessary to exercise our rights.

Notwithstanding any statement to the contrary in this Privacy Policy, these partners use your data only to process orders and in connection with the services We provide.

We will transmit your data to bodies outside Switzerland and the European Union (third countries) without your consent only if this is required under the contract in question, to comply with statutory obligations, or to safeguard our legitimate interests.

5.2 Credit check

Before you are shown a list of payment options, there is a pre-authorisation process which includes a credit check. If the result of this check is positive and your purchase is authorised, the options will include 'purchase on account' and 'purchase in instalments'. Your data is forwarded to Accarda AG, Birkenstrasse 21, 8606 Brüttsellen, Switzerland, in order to verify your address and conduct the credit check. Accarda AG therefore conducts the authorisation process.

If you order via the Online Shop at www.drinkdirect.ch and choose either the 'purchase on account' or 'purchase in instalments' options, our claim against you is assigned to Accarda AG. As a customer of the Online Shop of DIWISA Distillerie Willisau AG, you consent that the data that is associated with the 'payment on account' payment option and is available to the DIWISA Distillerie Willisau AG Online Shop, including personal data, purchase data, invoice, payment and collection data, may be used by Accarda AG, as the agent responsible, for its own purposes. In particular, Accarda AG is authorised to include this data in its own credit databases and to use it for further purposes of its own, including credit checks for the 'purchase on account', 'purchase in instalments', and 'credit cards' options for itself and for third parties, such as other online shops. For further information on the 'purchase on account' option, please refer to our General Terms and Conditions

6. Your rights

Insofar as provided for in the data protection legislation that applies to you, you may request information about the information that is stored about you, its origin and recipient, and the purpose for which it is processed. This information is free of charge. Subject to the applicable legal framework, you also have the right to have that data corrected or deleted, to have its use



restricted, or to object to its processing. You can also have the data issued to you so that it can be transferred to another body or agency.

Any authorisation that you have issued may be revoked at any time, effective for the future. All you need to do is to send a message by email to the following address: privacy@diwisa.ch. There are no specific formal requirements.

Please note that the rights set out above may be restricted by law, which may also make it difficult or impossible for Us to provide our services.

You are entitled to enforce your rights or claims in court or by means of a complaint to the competent data protection authority. In Switzerland, this is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

7. Current version and amendments to this Privacy Policy

We may change or adapt this Privacy Policy at any time. The current Privacy Policy at any given time can be accessed via Our Websites.