



## PRIVACY POLICY

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### 1. INTRODUCTION

We at Oxidental Trading with company number: 210367 ("Oxidental," "we," "us," "our") understand the importance of protecting the personal data of our customers, visitors, and all other individuals who engage with us (collectively, "you" or "your"). This Privacy Policy ("Policy") explains how we collect, use, disclose, store, and otherwise process your personal data when you visit our website at [www.oxidentaltrading.com](http://www.oxidentaltrading.com) (the "Website"), or when you otherwise contact us.

We are committed to safeguarding your personal data in compliance with the Data Protection Act 2017 of Mauritius. We have implemented organizational, physical, and technical measures designed to protect your personal data from unauthorized access, use, or disclosure.

Please read this Policy carefully. By accessing or using our Website and engaging with us for our services, you acknowledge and agree to the practices described herein.

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### 2. WHO WE ARE

Oxidental is a Mauritian-registered company focusing on wine distribution services. We act as a data controller when we decide how and why your personal data is processed. If you have any questions about this Policy or wish to exercise any of your rights under the Data Protection Act, please contact our Data Protection Officer ("DPO") using the details in Section 11 below.

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### 3. PERSONAL DATA WE COLLECT

We may collect personal data directly from you or from third parties (where lawful) for the purposes outlined in this Policy. The types of personal data we collect may include:

#### 3.1. Identification and contact information:

- o Full name, email address, telephone number, postal or billing address.
- o Employment details (e.g., company name, job title) if relevant to your inquiry or transactions.

#### 3.2. Transaction and financial information:

- o Payment details (e.g., credit card information, bank transfer data).
- o Purchase history (products ordered, date/time of orders).

#### 3.3. Usage data:

- o IP address, browser type, operating system, referral URLs, and pages visited.
- o Information collected through cookies or similar technologies (see Section 8 below).

#### 3.4. Other voluntary information:

- o Any information you provide to us in communications (email, phone, website forms).
- o Data from publicly available sources or anti-money laundering screening software.

#### 3.5. Sensitive and children's personal data and information:

We do not collect sensitive data (e.g., health information, religion). As we sell wine, we also do not collect or process the information or data of children. If we have to collect sensitive data for a lawful compliance reason, we will process it in accordance with the Data Protection Act.

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#### 4. HOW WE USE YOUR PERSONAL DATA

We only process personal data where we have a lawful basis. This typically includes:

##### 4.1. Contractual necessity:

- o To provide products or services you request (e.g., processing your wine orders, fulfilling shipments, handling payments).
- o To perform background checks or due diligence as required for certain transactions.
- o To respond to your enquiries.

##### 4.2. Legal obligations:

- o To comply with applicable laws, regulations, and guidelines (e.g., age verification for alcohol sales, record-keeping requirements, responding to requests from governmental authorities).

##### 4.3. Legitimate interests:

- o To maintain and improve our operations (e.g., fraud prevention, customer relationship management).
- o To send you important communications about the Services, upgrades, or changes to our terms or policies.
- o To conduct internal analytics (e.g., website usage trends, marketing research).

##### 4.4. Consent:

- o For marketing communications: If you have opted in, we may send you newsletters, promotions, or other information about our products or services. You can withdraw consent at any time.
- o For certain cookies or tracking technologies: Where required by the Data Protection Act, we will obtain your consent before setting non-essential cookies on your device.

If we need to process your personal data for a purpose other than that for which it was collected, we will obtain your consent or ensure that the new purpose is compatible with the original purpose under the Data Protection Act.

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#### 5. DISCLOSURE OF YOUR PERSONAL DATA

We treat your data as confidential. However, we may need to share personal data as set out below.

##### 5.1. Internal personnel:

Our employees and authorized agents who need access to the data to perform their duties (e.g., order processing, customer service).

##### 5.2. Third-party service providers:

- o Suppliers.
- o Logistics and delivery companies.
- o Payment processors, banks, or financial institutions.
- o IT service providers, website hosting, data storage, or analytics services (e.g., Google Analytics).
- o Professional advisers (e.g., auditors, legal counsel), where necessary.

##### 5.3. Public and regulatory Authorities:

Government agencies, regulators, or law enforcement when required by law, legal process, or to protect our rights or the rights of others.

##### 5.4. Business Transactions:

Potential buyers or investors, in the event of a merger, acquisition, or sale of all or part of our assets (we will ensure any recipients comply with the Data Protection Act).

We will not share your personal data with third parties for their own marketing purposes unless we have obtained your explicit consent.

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## 6. CROSS-BORDER DATA TRANSFERS

In certain cases, we may process or store your data in countries outside Mauritius, for example, if we use cloud services or communicate with international shipping partners. These countries may not offer the same level of data protection as Mauritius.

Where we make such transfers, we will take appropriate measures to ensure that your personal data is secure and treated in line with this Policy and the Data Protection Act requirements. Such measures may include standard contractual clauses or other recognized legal mechanisms.

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## 7. DATA RETENTION

We retain your personal data only for as long as necessary to fulfil the purpose(s) for which it was collected or to comply with legal, regulatory, or internal policy requirements. Where no fixed retention period is legally required, we will delete or anonymize data once it is no longer needed, unless otherwise required by law.

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## 8. COOKIES AND SIMILAR TECHNOLOGIES

We use cookies (small text files placed on your device) and similar technologies to:

- o Enable essential site functions.
- o Track page visits, time on page, and other analytics to improve site performance e.g. for Google Analytics.
- o Provide a customized experience by remembering your preferences such as language and region.

By using our Website, you consent to the placement of cookies. You may adjust your browser settings to refuse or remove cookies. However, this may affect certain Website features.

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## 9. YOUR RIGHTS

Under the Data Protection Act 2017, you have certain rights regarding your personal data. You may exercise any of these rights by contacting us (see Section 11). We will respond to valid requests within the timeframe prescribed by the Data Protection Act.

### 9.1. Right of access

You have the right to request:

- o Confirmation of whether or not we process personal data about you.
- o A copy of your personal data we hold, along with information on how and why we process it.

We may require additional information or proof of identity to verify your request.

### 9.2. Right to rectification

If you believe any personal data we hold about you is inaccurate or incomplete, you can request that we correct or update it.

### 9.3. Right to erasure

You can request the erasure (deletion) of personal data we hold about you under certain circumstances, for example, if:

- o The data is no longer needed for the purpose for which it was collected.
- o You withdraw consent (and no other legal basis applies).
- o The data has been processed unlawfully.

### 9.4. Right to restrict processing

You may request the restriction of processing in certain scenarios, such as when you contest the accuracy of your personal data or object to our legitimate interest, pending verification.

### 9.5. Right to object

You may object at any time to the processing of your personal data for:

- o Direct marketing purposes, including related profiling.
- o Other forms of processing based on our legitimate interests, unless we demonstrate compelling legal grounds to continue.

**9.6. Right not to be subject to automated decision-making**

You have the right not to be subject to a decision solely based on automated processing (including profiling) that produces legal or similarly significant effects on you, except in specific cases allowed by law (e.g., necessary for a contract, authorized by legislation, or with your explicit consent).

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**10. UPDATES TO THIS POLICY**

We reserve the right to modify or update this Policy at any time in response to legal, technical, or operational changes. The "Last Updated" date at the top of this Policy indicates the most recent revisions. Continued use of our Services after such changes indicates your acceptance of the revised Policy.

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**11. CONTACT US**

If you have any questions, requests, or concerns regarding this Policy or our data practices, please contact our Data Protection Officer ("DPO"):

Name: Nelmarie Baard

Address: c/o Ocorian Corporate Services (Mauritius) Limited, Level 6, Tower A, 1 Exchange Square, Ebene, 72201, Mauritius

E-mail: [info@oxidentaltrading.com](mailto:info@oxidentaltrading.com)

Tel: +230 580 32 687

If you believe we have not addressed your concerns or have violated your rights, you may lodge a complaint with the Mauritian Data Protection Commissioner.

Thank you for reading our Privacy Policy. Oxidental is committed to handling your personal data responsibly and transparently. We encourage you to check this Policy frequently for any updates.