

PRIVACY POLICY

« ROAD TO CARNAVAL »

www.roadtocarnaval.guaranaantarctica.ch

We, at SUMOL+COMPAL Marcas S.A., are committed to protecting your privacy and your personal data. In accordance with applicable data protection laws, we would like to inform you about the way in which we process your personal data when you navigate and interact with our website ("Website"), as detailed in this privacy policy (hereinafter, "Policy").

Whenever you participate in a promotional activity or send us a request through our Website, you may find a specific privacy notice informing you about the way in which your data is being processed.

1. WHO ARE WE?

SUMOL+COMPAL Marcas S.A., a public limited company, with registered office at Rua Dr. António João Eusébio, nº24, Apartado 530, 2791-901 Carnaxide, Portugal, NIPC 505 042 307 (hereinafter "SUMOL+COMPAL" or "we"), is the controller of your personal data for the purposes described in this Policy.

The Campaign is managed by 014 MEDIA PORTUGAL, LDA., with registered office at Avenida de Berna, nº11, 5th floor, 1050-036 Lisbon, registered at the Commercial Registry of Sintra under the unique identification number 510 078 664 (hereinafter "014 Media" or "Manager"), acting as a data processor on behalf of SUMOL+COMPAL.

SUMOL+COMPAL has designated a Data Protection Officer. Should you have any queries regarding the processing of your personal data or wish to exercise any of your data protection rights, please do not hesitate to contact us at: privacidade@sumolcompal.pt.

2. HOW DO WE COLLECT PERSONAL DATA?

When you access our Campaign Website www.roadtocarnaval.guaranaantarctica.ch (hereinafter, "Website"), you may provide us with personal information about yourself:

- Directly, in response to a form, file upload, participation in the promotional campaign, or by contacting us.
- Indirectly, through the analysis of your behaviour on the Website, cookies and trackers.

Whenever you provide data to us directly, you will always be informed of the mandatory data required to access the requested service. Without this data, SUMOL+COMPAL may not be able to provide you with any services.

3. DO WE PROCESS PERSONAL DATA OF MINORS?

To comply with laws protecting the online privacy of minors, SUMOL+COMPAL does not intentionally collect any personal data from persons under the age of 18.

SUMOL+COMPAL takes the privacy of minors seriously. As such, we recommend that a parent or legal guardian accompanies and guides any minor under the age of 16 who wishes to browse the Website or access the services provided by SUMOL+COMPAL.

Persons under the age of 18 must not use the Website or SUMOL+COMPAL's services. If SUMOL+COMPAL becomes aware that it has inadvertently collected personal data from a person under the age of 18, it will immediately delete such information.

4. WHAT PERSONAL DATA DO WE COLLECT AND WHY?

Why?	Which data?	Legal basis
For promotional activities (competitions, prize draws...): To register your participation; To verify whether the user meets the criteria set out in the applicable general terms and conditions; To send the prize where applicable.	Identification data: first name, last name, e-mail address, telephone number, passport details of the Winner and their companion. For each promotional activity, further information may be found in the Campaign Rules and/or the relevant Privacy Notice.	Agreement between SUMOL+COMPAL and the user, which the user accepts by participating in the promotional activity.
To respond to your requests and get in touch with you: To assist you; To respond to your requests and questions.	Identification data: first name, last name, e-mail address.	Agreement between SUMOL+COMPAL and the user.
To personalise our Website for you: To personalise the Website and services provided in accordance with the user's preferences and choices; To present the user with relevant information and advertising.	Technical information: IP address, location (country), domain names, Uniform Resource Identifier (URI), access activities on our Website. SUMOL+COMPAL endeavours not to associate this technical information with a specific user.	Consent, obtained through our cookie banner. For more information, please consult our Cookie Policy.
To protect and improve our Website: To analyse and improve our service provision; To prevent and detect fraud and misuse.	Technical information as described above.	Legitimate interest in developing and administering the Website and improving the services provided on the Website. Where applicable, your consent is obtained through our cookie banner.
To comply with applicable legislation: To protect the interests of SUMOL+COMPAL; To share data with official authorities for fiscal, accounting or other legal obligations, when necessary.	Any personal data provided through other processing activities.	Compliance with a legal obligation.

5. WHAT ABOUT SENSITIVE PERSONAL DATA?

For the purposes referred to above, SUMOL+COMPAL does not request special categories of personal data about you.

6. HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

Your personal data is not retained for longer than necessary to achieve the purposes referred to above. The following retention periods apply:

Purpose	Retention period
Promotional activities (competitions, prize draws...)	Up to 90 (ninety) days after the end of the Campaign Period, unless necessary in the context of legal proceedings or for compliance with legal obligations.
Personalisation of our Website	Up to 1 (one) year after the end of the promotional activity, unless necessary in the context of legal proceedings or for compliance with legal obligations.

Protection and improvement of our Website	Up to 1 (one) year after the end of the promotional activity, unless necessary in the context of legal proceedings or for compliance with legal obligations.
Compliance with legal and/or regulatory obligations	For the period required by the specific legal obligations for which personal data is processed.

Once the retention periods referred to above have elapsed, SUMOL+COMPAL will proceed to delete your personal data, unless we are legally obliged to retain it for a longer period (for example, for compliance with tax obligations) or where there is a legitimate interest in storing it for longer to protect our interests.

In the event that the information provided gives rise to a complaint, dispute or legal proceedings, SUMOL+COMPAL will retain the relevant data until a settlement, decision or final judgment is reached, archiving it for a period of 5 years from that date.

7. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

SUMOL+COMPAL undertakes to ensure the confidentiality of your personal data. Your personal data may be shared with the following recipients:

- The employees of SUMOL+COMPAL and 014 Media who work to provide you with the services listed above and who have undertaken a confidentiality obligation or are subject to an adequate legal confidentiality obligation.
- Other companies within the SUMOL+COMPAL Group for internal administrative purposes.
- The supplier, service provider, distributor or vendor involved in the requested service (for example, digital agencies working directly on the Website you access, suppliers that store data, send messages, etc.).
- Competent authorities or public entities, when required by law.
- Our auditors, legal advisors, lawyers or competent public authorities or courts, whenever necessary.

You may also obtain information about the identity of the recipients of your personal data by contacting us at: privacidade@sumolcompal.pt.

8. DO WE TRANSFER YOUR PERSONAL DATA TO ANOTHER COUNTRY?

As a general rule, your personal data will only be processed within the European Economic Area. However, it may occur that one of the recipients referred to above, with whom some data will be shared, is located in another country. In that case, SUMOL+COMPAL will only transfer your personal data if it is in compliance with applicable personal data protection legislation, with the appropriate safeguards established in Articles 44 to 50 of the GDPR. You may request a copy of the applicable transfer instrument (if any) by contacting us at: privacidade@sumolcompal.pt.

Where necessary to achieve the objectives related to the management of this promotional campaign, personal data may be transferred outside the European Union. SUMOL+COMPAL therefore undertakes to ensure that international transfers comply with applicable data protection legislation.

9. HOW DO WE PROTECT YOUR PERSONAL DATA?

Technical and organisational measures are implemented to minimise the risk of destruction, loss (including accidental loss), unauthorised access/use or use incompatible with the original purpose of collection.

10. WHAT ARE YOUR DATA PROTECTION RIGHTS?

You have several rights regarding the processing of your personal data, such as the right to:

- Obtain additional information or clarification regarding the processing of your personal data and obtain a copy of your personal data.
- Request the correction of your personal data if it is inaccurate or incomplete.
- Object to the processing of your personal data for reasons related to your particular situation, whenever processing is based on one of our legitimate interests.
- Obtain restriction of processing from us (i.e., temporary suspension of processing) while we assess the validity of another request relating to your personal data.
- Data portability, whenever you have provided us with personal data (i.e., the right to receive your personal data in a commonly used and machine-readable format and to have it transmitted to another controller).
- Request the erasure of your personal data.
- Withdraw your consent, whenever your personal data has been collected or is being processed based on your consent.

You may exercise these rights at any time by contacting us in writing at privacidade@sumolcompal.pt. Please note that these rights are not absolute and may be subject to specific conditions. If you contact us to exercise one of these rights, we will assess your request and get in touch with you as soon as possible.

If you believe that SUMOL+COMPAL has not correctly handled your request or has infringed the applicable data protection law, you may lodge a complaint with the competent supervisory authority in your place of residence. In Switzerland, this authority is the Federal Data Protection and Information Commissioner (FDPIC — www.edoeb.admin.ch).

11. CHANGES

This Policy entered into force on 1 June 2026.

We reserve the right to amend this Policy, in whole or in part, or simply to update its content, for example as a result of changes in applicable legislation.

We invite you to visit this page regularly in order to familiarise yourself with the most recent and updated version of the Policy, so that you can remain constantly informed about the way in which SUMOL+COMPAL collects and uses your personal data.