

PRIVACY POLICY

Data Controllers

WEBSITE DATA CONTROLLER

CAA Media SRL

ROLE

Website owner, IP licensor & data controller for website operations

REGISTERED OFFICE

Jan Van Rijswijcklaan 228
2020 Antwerp, Belgium

ENTERPRISE NUMBER

1021.796.317

PRIVACY CONTACT

privacy@iconyc.cc

SUPERVISORY AUTHORITY

dataprotectionauthority.be

CAA Media SRL is the data controller for personal data processed through this Website. When you buy something, the ICONYC Group company that sells it to you is the data controller for your order. This Privacy Policy explains what we collect, why, how long we keep it and how you can exercise your rights. Effective 15 October 2026. Version 2.0.

Introduction

CAA Media SRL, with registered office at Jan Van Rijswijcklaan 228, 2020 Antwerp, Belgium, holds the intellectual property of the ICONYC Group and owns and operates www.iconyc.cc (the "Website"). Together with the ICONYC Group companies listed in our [Terms and Conditions](#), we take the confidentiality and security of your personal data seriously.

This Privacy Policy is provided under Articles 13 and 14 of Regulation (EU) 2016/679 (the General Data Protection Regulation, "GDPR") and the Belgian Act of 30 July 2018 on the protection of natural persons with regard to the processing of personal data. Our use of cookies is explained separately in our [Cookie Policy](#).

01 Who Is Responsible for Your Data

CAA Media SRL

CAA Media SRL is the controller for personal data processed to run the Website and keep it secure, for customer accounts, the newsletter and marketing communications, contact and trade enquiries, and job applications submitted through the Website.

The company that sells to you

When you place an order, the ICONYC Group company named as the seller at checkout and in your order confirmation is the controller for the personal data needed to perform your purchase, including payment, delivery, returns and invoicing.

Group companies outside the European Union

Several ICONYC Group companies are established outside the European Union, in the United Kingdom, Switzerland, Japan, South Korea, the United States and the United Arab Emirates. Where they process personal data of people in the European Union, CAA Media SRL acts as their representative in the European Union under Article 27 GDPR, and can be contacted at privacy@iconyc.cc.

02 Personal Data We Collect

Browsing and technical data

When you visit the Website, our servers automatically record technical data such as your IP address, browser and device type, the pages requested and the time of each request. We use it to operate the Website and keep it secure, not to identify you or to compile statistics. To apply the right legal drinking age, your approximate country is derived from your IP address. Some forms are protected against automated abuse by Cloudflare Turnstile, which analyses technical signals from your browser.

Age check

To enter the drinks pages you are asked for your year of birth. It is not stored. Only a confirmation that you passed the check is kept in your browser for the duration of your visit.

Customer account

When you create an account, we collect your name, email address, date of birth, country, telephone number and password. Your date of birth is used to confirm that you are of legal age to buy alcohol. Your password is stored only in encrypted form.

Orders and payments

When you buy something, we collect your name, billing and delivery addresses, email address, telephone number and order details. Payments are processed by Stripe, including card payments, Apple Pay, Google Pay, Klarna and PayPal. We do not receive or store your full card details. Stripe tells us whether a payment succeeded and whether it was flagged as a fraud risk.

Contact and trade enquiries

When you use our contact form, we collect your name, surname, email address, the department you write to and your message. For trade enquiries we also collect your company, position and telephone number.

Newsletter

When you subscribe, we collect your email address and a record of your consent. Our newsletter is designed and sent with our own mailing system, so your email address is not passed to an external mailing service.

Job applications

When you apply for a position, we collect your name, location, email address, telephone number, the position you apply for, your salary expectations, preferred work arrangement, portfolio link, your answers to our

questions and your CV. Please do not include sensitive information, such as health data, in your application unless we ask for it.

03 Purposes of Processing and Legal Basis

a) Running the Website and keeping it secure

To provide the Website, prevent misuse and fraud, and protect our systems. **Legal basis.** Article 6(1)(f) GDPR, our legitimate interest in a secure and functioning Website.

b) Age check

To make sure alcohol content and products are only offered to people of legal drinking age in their country. **Legal basis.** Article 6(1)(c) GDPR, compliance with legal obligations on the sale and promotion of alcohol, and Article 6(1)(f) GDPR.

c) Customer account

To create and manage your account and give you access to members only content. **Legal basis.** Article 6(1)(b) GDPR, performance of the contract for your account.

d) Orders, delivery and after sales service

To process your order and payment, deliver your purchase, handle returns, warranty claims and disputes, and prevent payment fraud. **Legal basis.** Article 6(1)(b) GDPR, performance of a contract, Article 6(1)(c) GDPR, accounting and tax obligations, and Article 6(1)(f) GDPR, our legitimate interest in preventing fraud. The controller is the company that sells to you.

e) Contact and trade enquiries

To answer your questions and handle trade and business enquiries. **Legal basis.** Article 6(1)(b) GDPR, steps taken at your request before entering into a contract, and Article 6(1)(f) GDPR, our legitimate interest in responding to enquiries.

f) Newsletter and marketing

To send you news, invitations and offers about ICONYC Group products and events by email or other channels you have chosen. **Legal basis.** Article 6(1)(a) GDPR, your consent. If you are already a customer, we may also send you information about similar products by email under Article 6(1)(f) GDPR, as permitted by the Belgian Royal Decree of 4 April 2003. You can unsubscribe at any time through the link in every message.

g) Recruitment

To assess your application and, if you agree, keep it for future openings. **Legal basis.** Article 6(1)(b) GDPR, steps taken at your request before entering into an employment contract, and Article 6(1)(a) GDPR, your consent for keeping your application for future openings.

h) Legal obligations and claims

To comply with the law, respond to requests from authorities and establish, exercise or defend legal claims. **Legal basis.** Article 6(1)(c) GDPR and Article 6(1)(f) GDPR.

Providing your personal data is voluntary. Fields marked as mandatory are needed to provide the service you request, such as an account, an order or a reply to your message. If you do not complete them, we cannot provide that service.

04 Automated Decisions

We do not make decisions about you based solely on automated processing, including profiling, that produce legal effects or similarly significantly affect you. The only exception is fraud screening by Stripe, which may automatically decline a payment that appears fraudulent, as necessary to perform the contract. In that case you can contact us to obtain human review, express your point of view and contest the decision.

05 Who We Share Your Data With

We only share personal data where necessary for the purposes above, with the following recipients.

- **ICONYC Group companies**, as controllers for the orders they sell to you, or where needed to provide a service you request or to assess a job application.
- **ICONYC Solutions SL, Spain**, which hosts the Website on its own servers in Spain, managed from its office in Zaragoza, develops and maintains the Website, runs our newsletter system and operates the IP geolocation service for the age check, as our processor.
- **DigitalOcean**, which stores media files for the Website in Frankfurt, Germany, as our processor.
- **Stripe**, our payment processor, which also acts as an independent controller for fraud prevention data. Klarna and PayPal act as independent controllers when you choose them.
- **Cloudflare** for protection against automated abuse, and **Font Awesome** for the icons on the Website.
- **Carriers and delivery partners**, to deliver your orders.
- **Professional advisers and authorities**, such as lawyers, auditors, courts and public authorities, where required by law or to defend our rights.

Our processors act only on our instructions under written agreements that meet Article 28 GDPR. We do not sell your personal data and do not share it with third parties for their own advertising.

06 International Transfers

Some recipients are located outside the European Economic Area. Transfers to the United Kingdom, Switzerland, Japan and South Korea rely on adequacy decisions of the European Commission. Transfers to the United States rely on the EU US Data Privacy Framework where the recipient is certified, and otherwise on the Standard Contractual Clauses approved by the European Commission. Transfers to the United Arab Emirates rely on the Standard Contractual Clauses.

You can request a copy of the safeguards that apply to your data at privacy@iconyc.cc.

07 Retention Period

We keep personal data only for as long as needed for the purpose for which it was collected, after which it is deleted or anonymised.

- **Customer accounts.** While your account is active, and deleted two years after your last activity or when you close your account.
- **Orders and invoices.** Ten years, as required by Belgian accounting law. Group companies outside Belgium keep these records for the period required by their local law.
- **Contact and trade enquiries.** Two years after our last exchange.
- **Newsletter.** Until you unsubscribe. We keep a record of your consent and its withdrawal for as long as needed to prove it.
- **Job applications.** Six months after the recruitment process ends, or up to two years if you agree that we keep your application for future openings.
- **Technical logs.** 30 days, unless needed longer to investigate a security incident.
- **Age check and country.** Only in your browser, for the duration of your visit.

08 Security

We use appropriate technical and organisational measures to protect your personal data against loss, misuse and unauthorised access, including encrypted connections, access controls and encrypted storage of passwords. Only authorised staff who need the data for their work can access it. If a personal data breach is likely to result in a high risk to you, we will inform you without undue delay.

09 Your Rights

Under Articles 15 to 22 of the GDPR, you have the following rights in relation to your personal data.

RIGHT OF ACCESS

Ask whether we process your personal data and receive a copy of it.

RIGHT TO RECTIFICATION

Have inaccurate or incomplete personal data corrected.

RIGHT TO ERASURE

Have your personal data deleted where it is no longer needed or lawfully processed.

RIGHT TO RESTRICTION

Have the processing of your personal data restricted in certain circumstances.

RIGHT TO OBJECT

Object to processing based on our legitimate interests, and at any time to direct marketing.

RIGHT TO PORTABILITY

Receive your personal data in a structured, machine readable format and have it sent to another controller.

RIGHT TO WITHDRAW CONSENT

Withdraw your consent at any time, without affecting processing carried out before.

AUTOMATED DECISIONS

Obtain human review of a decision made solely by automated means.

RIGHT TO COMPLAIN

Lodge a complaint with the Belgian Data Protection Authority
(Gegevensbeschermingsautoriteit, Autorité de protection des données).

To exercise your rights, contact the controller identified in section 01, or write to privacy@iconyc.cc, and we will forward your request where needed. Requests are free of charge and answered within one month, which may be extended by two further months for complex or numerous requests, in which case we will tell you why. We may ask you to confirm your identity before acting on a request.

10 Children

Our shop and drinks pages are for adults only. We do not knowingly collect personal data from children under 13, the age of digital consent in Belgium. If you believe a child has provided us with personal data, please contact us and we will delete it.

11 Changes and Contacts

We may update this Privacy Policy when our processing or the law changes. The version published on this Website is the one in force. If you have an account or subscription, we will inform you of material changes by email before they take effect.

DATA PROTECTION ENQUIRIES

privacy@iconyc.cc

LEGAL & COMPLIANCE

legal@iconyc.cc

POSTAL ADDRESS

CAA Media SRL
Jan Van Rijswijcklaan 228
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SUPERVISORY AUTHORITY

Gegevensbeschermingsautoriteit
Drukpersstraat 35, 1000 Brussels
www.dataprotectionauthority.be

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