

Corby Online Privacy Policy



Corby Spirit and Wine Limited respects your right to privacy when you use our digital media (such as our websites, our mobile applications, our pages on social networks, any online forms to register to our events), communicate electronically with us, and interact with us offline, such as by calling our offices or participating in a promotional event.

The purpose of this Privacy Policy is to inform you how Corby Spirit and Wine Limited, a corporation duly organized under the laws of Canada, with its registered address at 225 King Street West, Suite 1100, Toronto, Ontario M5V 3M2 and its Canadian and worldwide affiliates (all together “Corby”, “we,” or “our”) collect, store, use and process your Personal Data provided through any digital media operated by Corby (“**Digital Media**”) and through telephone, written, and in-person interactions. This Privacy Policy applies to all of our brands: <https://corby.ca/en/our-brands/> . Corby is the local Pernod Ricard entity when Canada is selected as location of residence.

By submitting Personal Data to Corby, our service providers, and agents, you agree that we may collect, use and disclose such Personal Data in accordance with this privacy policy and as permitted or required by law. If you provide us with the Personal Data of another individual, you represent that you have all necessary authority and/or have obtained all necessary consents from such person to enable us to collect, use and disclose such Personal Data for the purposes set forth in this privacy policy.

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1. What Personal Data do we gather about you and how do we collect it?

"Personal data" refers to any information that may identify you directly (e.g., your name) or indirectly (e.g., your phone number, postal/email address, pseudonymized data such as a unique identifier).

We collect most of the personal data directly from you, for example by filling out a contact form, creating an account, using interactive features, subscribing to a service, registering and attending to an event, joining a loyalty program, attending any of our experiences, courses and testing, participating in a marketing campaign, entering a contest, ordering a product or service, requesting information, or responding to surveys.

Depending on the purposes of collection, personal data collected are the following:

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- your name, your gender and contact details, including your postal address, email address, and phone numbers, and, where applicable, your business contact details; information allowing us to verify and check your identity, such as your date of birth;
- your billing and delivery information, transaction and payment card information;
- location data;
- information to enable us to undertake financial checks on you to the extent permitted by applicable law;
- your professional online presence, e.g. LinkedIn profile;
- information from accounts you link to us, e.g. social media;
- your contact history, purchase history, and saved items;
- your interests, tastes and preferences;
- information on how you use our Digital Media;
- your responses to surveys and promotions;
- your IP address and your mobile/tablet/device identifier;
- customer service information (e.g., customer service inquiries, comments);
- content you may provide to us (e.g., images, comments, audio recordings, etc.).

The personal data collected is necessary to achieve the purposes described in section 3 below. If you do not provide the personal data we request, it may delay or prevent us from providing you with products or services.

2. How and why do we use tracking technologies?

Corby uses tracking technologies such as cookies, IP Addresses or Log files. Tracking technologies help us tailor our Digital Media to your personal needs.

- We use cookies to better understand how visitors use our Digital Media and the tools and services offered, and improve their use and functionality. Subject to your consent where required by applicable law, our Digital Media use cookies and similar technologies (“cookies”). Cookies are small files that are placed on your device that serve a number of purposes like letting you navigate between pages efficiently, remembering your preferences, and generally improving your experience. The use of cookies on our Digital Media allows you to enjoy more seamless visits and more accurately measures your behavior on our Digital Media. You can learn more about the cookies we use and how you can enable and disable cookies by clicking on “Cookie Consent” in the bottom right corner of our websites.
- An IP address is a number that is used by computers on the network to identify your computer every time you log on to the Internet. We may keep track of Internet Protocol (IP) addresses to (among other things): (i) troubleshoot technical concerns, (ii) maintain website safety and security, (iii) restrict access to our Digital Media to comply with applicable law or contractual restrictions, and, (iv) better understand how our Digital Media is used.

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- We (or a third party on our behalf) may collect information in the form of log files that record activity on the Digital Media and gather statistics about users' browsing habits. These entries are generated anonymously, and help us gather (among other things) (i) a user's browser type and operating system, (ii) information about a user's session (such as the URL they came from, the date and time they visited our Digital Media, and which pages they've viewed on our Digital Media and for how long), and, (iii) other similar navigational or click-stream data. We also use information captured in log file for our internal marketing and demographic studies, so we can constantly improve and customize the online services we provide you. Log files are used internally only, and are not associated with any particular user.
- We (or a third party on our behalf) may collect your precise or general location from your device when you use a mobile application (including a mobile browser). We only collect this location information when you have enabled location services on your device.

3. For what purpose do we use your Personal Data and based on which legal grounds?

We collect and use your Personal Data to:

- **Respond to your request of service or for the performance of a contract:** When you register or sign-up in our Digital Media (mobile app, websites, social media, etc.) or in person, your Personal Data is used to provide you with the relevant features and services you subscribe to, and to offer you the benefits and privileges that typically come along with your registration (e.g. receiving the communications you select at the time of registration, being invited to events, participating in a sweepstake, etc.). If you wish to unsubscribe from receiving promotional messages, the easiest way is using the preference manager at the footer of each promotional message we send. You can also contact our privacy officer using the contact information below.
- **When you purchase products on our websites:** we use your Personal Data to manage your order and deliver your products.
- **Send you transactional or administrative communications:** (e.g. confirmation emails when you sign up for, or unsubscribe from, a specific registration or activity), as well as certain service-related announcements (e.g., notices about updates to our privacy notices, discontinued features or programs on our Digital Media, changes to our online services or technical support policies, or other related changes), or respond to your inquiries or complaints.
- **Allow us to send you marketing information, about the various brands we sell , (i) by electronic communications, phone and (ii) by displaying advertisements for you and people with a similar profile to you, on Corby Digital Media and/or any digital advertising platforms such as social media platforms., when you consent:**
 - In addition to the purpose for which you submitted your Personal Data, you may also be given the option (through a check box or otherwise) to have your Personal Data used for an activity or service different from the primary activity or service that you are requesting. For example, if you are signing up for a contest or other promotion, you may also be invited to sign up for newsletters or alerts from our Digital Media

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hosting the promotion or from other websites or through other means. If you choose to receive these additional services, we will use your Personal Data to provide them to you.

- When you use the “Send to a friend” feature: this Personal Data is used only once to send the communication and is not further retained by us, as appropriate according to local law. Before using a feature, please ensure you have obtained your friend’s consent to send the communication for this limited purpose.
- When you use a QR Code or equivalent feature displayed on Corby products: we use your Personal Data to send you more information on the products where the QR code or equivalent feature is displayed or other products.
- In order to display advertisements likely to be of interest to you, we will share your identification data (such as your surname, first name, contact details) to the relevant digital advertising platforms (such as social media). Once your data is shared on such platforms, it is used to enable them to find you among their users, and (i) to show you ads about our products and services relating to brands operated by us when you browse such platforms, and (ii) to identify, based on your profile on the relevant platforms, lookalikes who may also be interested by Corby’s ads. In the context of these activities, we do not however, collect or access at any time the personal data concerning you held by the digital advertising platforms concerned and relating in particular to your profile or your behavior on such platforms.
- Please note that Corby markets products and services under various brands and will process the personal data you provide when interacting with any of these brands.
- **Because it is also Corby’s legitimate interest to better serve you:**
 - We may occasionally combine, update, or otherwise enhance the Personal Data we collect directly with data we receive from outside records or third parties, subject to your consent when required for such third parties to disclose such Personal Data to us. For instance, we may combine non-identifiable demographic or survey information (e.g. age, gender, household information, and other interests, etc.) not linked to any Personal Data about you with Personal Data collected through our offers (such as during account registration).

We may use the combined above-mentioned information and/or non-identifiable demographic information for our internal marketing and demographic studies and to constantly improve, personalize, and customize the products and services we provide you to better meet your needs. Some of the tools we use may involve automated individual decision-making subject to applicable law.

- Feedback, questions, or comments through our “Contact Us” form and our “Tell Us” compliance reporting system: if you contact us via an online contact form or hotline, your Personal Data is used to respond to your inquiry or comment and for us to address your feedback, questions or comments, such as by improving or services or products or addressing compliance issues.

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- We will take steps to ensure that your Personal Data remains accurate and up-to-date and avoid duplication in our database, by verifying each of your interactions with us and/or one of our affiliates to ensure your Personal Data is still accurate or needs to be completed or updated with the additional information you will have provided.
- We may monitor your browsing activities on our Digital Media to better understand your preferences and center of interests and adapt our marketing communications to your interests, unless you object in the conditions set forth in Article 9 of this Privacy Policy.

Corby may process Personal Data involving automated decision making, including for the performance of a contract (e.g. to avoid fraudulent payment) or, subject to your consent, to better serve your needs in accordance with your preferences.

Please note that the automated tools used are regularly checked to ensure that the Personal Data is processed fairly. Specific measures such as data minimization are implemented when creating profiles. You are invited to express your observations or request to review an automated decision involving you by sending an email to the contact details in Section 12 below. Subject to applicable law, you may also object the result of the automated decision and/or request that such decisions be corrected by sending an email to the contact details in Section 12 below.

4. What happens if you do not wish to provide your Personal Data?

If you choose not to submit any Personal Data when requested, you may not be able to participate in certain activities and personalized features for which such Personal Data may be necessary, or the Digital Media services and special offers to you may be limited as is necessary. For example, if you refuse to share your email address, you will not be able to receive our newsletters or otherwise register on our Digital Media for which such information is required. However, to simply browse our Digital Media and learn more about Corby and our products, you do not need to give us any Personal Data. In any event, we will always inform you of the Personal Data that is necessary in order to benefit from a service.

5. To whom do we transfer and disclose your Personal Data and why?

- **To internal authorised employees:** We will communicate your data to our employees who need to process your personal data for the purposes specified in Section 3 of this Privacy Policy, in particular to our digital marketing, sales, accounting and tech teams. Your personal data can also be processed by employees from Corby's affiliates worldwide that provide support services (IT, administrative, marketing support).
- **To service providers:**
 - **For marketing and communication purposes, including competitions and events:** we will share your data with our marketing and communication service providers such as advertising agencies, marketing agencies, social media and digital agencies to help us carry

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out competitions and events, advertising, marketing and sales campaigns, as well as analyzing their effectiveness and manage your contacts and queries.

- **For IT support purposes:** we will share your data with our IT support service providers (for hosting, maintenance and technical support services) to help us for the internal operations of our Digital Media and to assist us with administering them or the various features, programs and promotions available on it.
- **For management of orders, payments, deliveries and after sales purposes:** we will share your data with our IT support services providers, customer support, logistical and transport services and payment services providers.
- **To partners:**
 - **For joint and co-sponsored programs or promotion:** when we run a joint or co-sponsored program or promotion on our Digital Media with another company, organization, or other reputable third party, we may share your personal data with our partner or sponsor. If your personal data is shared with a company other than Corby as part of such program/promotion, we will let you know this at the time your personal data is collected.
 - **For targeted advertising purposes:** as indicated above, we will share, with your consent, your personal data with the following digital advertising platforms such as: Facebook, Instagram, Pinterest to display targeted ads on them, about the products and services of our various brands, to you and people with a similar profile to you. For more information about how such social media process your personal data and on how to exercise your rights with them in connection with any further processing of your personal data, we invite you to view their privacy policy on their website [Facebook](#), [Instagram](#), [Pinterest](#).
- **To other third parties:**
 - **For marketing communication purpose:** we may disclose your personal data to our business partners only with your consent.
 - **For litigation and safety purposes:** we may also disclose your personal data to authorities and/or external counsels if we are required to do so by law, or if in our good faith judgment, such action is reasonably necessary to comply with legal processes, to respond to any claims, or to protect the security or rights of Corby, its customers, or the public.
 - **In the event of a merger or acquisition of all or part of Corby by another company,** or in the event that Corby were to sell or dispose of all or a part of the Corby business, the acquirer may have access to the information maintained by that Corby business, which could include personal data, subject to applicable law. Similarly, personal data may be transferred as part of a corporate reorganization, insolvency proceeding, or other similar event, if permitted by and done in accordance with applicable law. If applicable, the acquirer who will act as the

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new data controller will process your personal data in the conditions provided in the acquirer's privacy policy.

6. Is your Personal Data sent to recipients located in other countries and why?

Corby is a part of Pernod Ricard's global affiliate network and your Personal Data may be disclosed or transferred across jurisdictions and international borders, including across Canada, the European Economic Area, and the United States. As such, Personal Data may be transferred to territories that have a different level of data protection laws than the one existing in the jurisdiction from where you submitted the Personal Data. Corby may be compelled to provide your Personal Data to foreign governments and law enforcement authorities where required by applicable law.

Corby takes appropriate measures to maintain security of the Personal Data both during transit and at the receiving location by implementing contractual clauses in accordance with applicable law. The transfer of Personal Data to service providers is implemented in accordance with applicable law and relies on standard contractual clauses that ensure an appropriate standard of privacy protection and require the implementation of all administrative, technical, and physical measures necessary on an ongoing basis to keep Personal Data secure.

7. How long do we keep your Personal Data?

We will store Personal Data in our databases as long as your account is active, for the duration of the contract with you or as needed to provide you the services you requested, or to answer queries, resolve problems, or provide improved and new services. We may also retain your Personal Data in accordance with our internal retention procedure as necessary to comply with our legal and regulatory obligations, resolve disputes, and enforce our agreements, or as otherwise permitted under applicable law.

8. How do we secure your Personal Data?

Corby takes appropriate technical and organizational measures to protect the confidentiality and security of your Personal Data collected from this website and/or our applications, including sensitive Personal Data. These efforts include but are not necessarily limited to: (i) storing your Personal Data in secure operating environments that are not available to the public and that are only accessible to authorized Corby employees, and our agents and contractors; and, (ii) verifying the identities of registered users before they can access the Personal Data we maintain about them. Our Digital Media may link up users to other websites of third parties and/or affiliates or subsidiaries of Corby, through hyperlinks; this is a service available to you as a user of the site. Such links do not constitute an endorsement by Corby of the linked sites, their content, including products, advertising or any other materials featured on them. Corby has no control over these linked sites and cannot be held responsible or liable for their content, including products, advertising or any other materials featured on them, or any purchase you may choose to make on these linked sites. Please be aware though that, despite these efforts, no security measures are perfect and no systems are impenetrable. You should understand that any time you share Personal Data, it could be accessed by a third party, such as

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hackers. As such, you should take care to ensure that you have considered this possibility when sharing Personal Data.

9. What are your rights regarding your Personal Data?

Subject to any restrictions under applicable law, you may have the following rights regarding your Personal Data:

- If your Personal Data has been processed on the basis of your consent, **you can withdraw your consent at any time.**
- You can request **to access** your Personal Data.
- You can request **to rectify your Personal Data** if it is inaccurate, incomplete or out of date.
- You can request the **erasure** of your Personal Data (i) if your Personal Data is no longer necessary for the purpose of the data processing, (ii) you have withdrawn your consent on the data processing based exclusively on such consent, (iii) you objected to the data processing, (iv) the Personal Data processing is unlawful, (v) the Personal Data must be erased to comply with a legal obligation applicable to Corby. We will take reasonable steps to inform the other entities of Corby of such erasure.
- You can request **the restriction** of the processing of your Personal Data (i) in the event the accuracy of your Personal Data is contested to allow Corby to check such accuracy, (ii) if you wish to restrict your Personal Data rather than deleting it despite the fact that the processing is unlawful, (iii) if you wish Corby to keep your Personal Data because you need it for your defense in the context of legal claims (iv) if you have objected to the processing but Corby conducts verification to check whether it has legitimate grounds for such processing which may override your own rights (v) if the data processing is based on the legitimate interest of Corby.
- You can request **the portability** of the Personal Data you provided to us, in particular if the Personal Data processing is based on your consent or the performance of a contract.
- You always have the option not to share any of your Personal Data with us. If you choose this option, you may be limited in the activities and features we can provide you for which such Personal Data is necessary.
- You can object to the processing of your Personal Data by us, including for marketing purposes based on profiling.

Depending on the applicable law, you have also the right to give general or specific instructions on how your Personal Data processed under this Privacy Policy may be used after your death.

10. How we treat children's Personal Data?

Our Digital Media and other products and services are not intended for children under the legal drinking age ("Minor"), so we do not knowingly collect Personal Data from Minors. You must be of the legal drinking age to create an account and engage in activities and transactions on our Digital Media. If we are notified or learn that a Minor has submitted Personal Data to us, we will delete such Personal Data.

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11. How can you contact us or the relevant Supervisory Authority?

If you have any questions, complaints, or comments regarding this Privacy Policy or our information collection practices, please contact us by writing to:

*Chief Privacy Officer
Corby Spirit and Wine Limited
225 King Street West, Suite 1100
Toronto, Ontario M5V 3M2*

By email: Privacy.Corby@pernod-ricard.com

You can also lodge a complaint with the Supervisory Authority or privacy commissioner of the country or province where you are located if you have any concerns about the conditions of processing of your Personal Data by Corby. However, we would appreciate an opportunity to address your concerns before you escalate the matter to a Supervisory Authority or privacy commissioner, so please contact us first at the contact information listed above.

12. Changes to our privacy policy

We keep our privacy policy under regular review, and we will place any updates at this location to reflect any changes to the Personal Data we collect and how we process it.

This privacy policy was last updated in February 2025.