

## **PRIVACY POLICY**

When you use the digital media (our website, our mobile applications, our content on social networks, or online forms for event registrations, “Digital Media”) of Pernod Ricard or communicate with us, we respect your privacy. Therefore, we have created this privacy policy to inform you about how Pernod Ricard Deutschland GmbH (“Pernod Ricard,” “we,” or “our”) collects, stores, and processes the personal data you provide to us through the Digital Media operated by Pernod Ricard.

The contact details of Pernod Ricard are:

Pernod Ricard Deutschland GmbH, Habsburgerring 2, 50674 Cologne

Phone: +49 221 43 09 09-0

Email: [info@pernod-ricard-deutschland.com](mailto:info@pernod-ricard-deutschland.com)

Register Court: District Court of Cologne, Register Number: HRB 38302

VAT Identification Number: UST-ID/VAT DE 148 719 988

### **The Group Data Protection Officer of Pernod Ricard is:**

Florence Raynal

Phone: +49 221 430909 140

Email: [datenschutz@pernod-ricard-deutschland.com](mailto:datenschutz@pernod-ricard-deutschland.com)

Before using our Digital Media, please read this privacy policy carefully (including the Pernod Ricard Cookie Policy, see Article 2). If you do not agree with this privacy policy or the Pernod Ricard Cookie Policy, please do not use our Digital Media. We reserve the right to amend this privacy policy or the Pernod Ricard Cookie Policy at any time. If you have subscribed to our newsletter, we will inform you of changes to this privacy policy or the Pernod Ricard Cookie Policy. Otherwise, we invite you to regularly review this privacy policy or the Pernod Ricard Cookie Policy to ensure you are informed about changes and how we may use your data.

Pernod Ricard and/or affiliated companies (see attached list “Pernod Ricard Group”), if they share your personal data under the conditions described below, are the responsible entity for any personal data you send to Pernod Ricard.

#### **1. What Personal Data Do We Collect About You and How?**

For the purposes of this privacy policy, “Personal Data” means any information that can be used to personally identify you or contact you online or offline. We may collect the following information: first name, last name, gender, title, date of birth, email address, country of residence, country code, address, postal code, city, mobile number, landline number, business phone number, contact type (B2C, B2B, B2E, shareholder), date of data collection, updated date of data collection, job title, Twitter ID, Facebook ID, Instagram ID, role (subscriber, applicant, partner), department (for B2B contacts), industry (for B2B contacts), SIRET (for B2B contacts), company (for B2B contacts), bar name (for B2B contacts), preferences, personal interests, preferred communication method, Net Promoter Score, whether the contact is a participant in a luxury program, whether the contact is part of a travel program, opt-in status, brand the contact has signed up for, description of the activity the contact participated in, and the source of the collected data.

Personal data is collected in accordance with this privacy policy when you want to use any of the many features and services of our Digital Media, namely:

- Registration or sign-up for our Digital Media;
- Send to a friend;
- Sweepstakes and competitions;
- Subscription to a program or newsletter;
- When you shop online on our sites;
- Connected products (this refers to Pernod Ricard products that interact with the end consumer. Data is also collected at this touchpoint);
- Organization of events (invitation forms or online forms on tablets filled out by our hostesses);
- Trainings;
- Tastings;
- Brand event experience at home;
- Brand home;
- Feedback, inquiries, surveys, questions, or comments via our contact form;
- Any other request that requires the transmission of personal data.

Please note that our services may change from time to time. In this case, we will adjust the privacy policy accordingly.

The type and amount of personal data collected for the above functions may vary depending on the specific activity.

In accordance with applicable laws, we use a variety of technologies that collect and provide information about how our Digital Media is accessed and used. Demographic information about users of our Digital Media is also collected, which we may obtain from third parties, namely Google, AdForm, Bluekai, and the social media they use ("Usage Information"). Usage Information may include the pages you visited, the duration of viewing, which beverage information or other content you accessed or provided, in which language, demographic information about you (such as age, gender, interests, if available), and which pages you viewed before visiting the current page, so we can get a better understanding of how users interact with our brands. The majority of the Usage Information we collect cannot usually be linked to you personally, but if we can make a connection to you, we treat the information as personal data within the meaning of this privacy policy.

## 2. How and Why Do We Use Tracking Technologies?

Pernod Ricard uses tracking technologies, namely cookies, IP addresses, or log files, to collect certain information, such as your browser type, operating system, referring page, navigation path through our site, ISP domain, to improve the user experience and functionality of our

website and to better understand how visitors use our digital media and the tools and services offered on it. Tracking technologies help us tailor our digital media to your personal needs.

- We use cookies to enhance the utility and functionality of our digital media and to better understand how visitors use our digital media and the tools and services offered on it. Where legally required, our digital media will only use cookies and similar technologies (“Cookies”) with your consent. Cookies are small files placed on your device that serve a variety of purposes, such as more efficient navigation between our pages, storing your preferences, and generally improving your user experience. The use of cookies on our digital media allows for smoother visits and better tracking of your behavior on our site. If you want to learn more about the cookies we use and how they are used, as well as the option to disable cookies, please read the Pernod Ricard Cookie Policy;
- An IP address is a numerical sequence used by computers in a network to identify your computer each time you log onto the internet. We may collect Internet Protocol (IP) addresses for the following purposes: (i) troubleshooting technical issues, (ii) maintaining the security of our website, (iii) restricting access to our digital media for certain users, (iv) better understanding the use of our digital media, and (v) geographic targeting;
- We (or third parties on our behalf) may also collect information in the form of log files, which record the activities of our digital media and collect statistics about our visitors’ browsing habits. These entries are generated anonymously and help us capture the following information: (i) a user’s browser type and operating system, (ii) information about the visitor session (such as the original URL, date and time of the visit to our digital media, and which pages you viewed on our digital media and for how long), and (iii) other similar navigation or click-stream data. We use the information collected in the log file for our internal marketing and demographic studies, so we can continuously improve and tailor the online services we provide to you. Log files are used internally only and are not associated with any specific user.

### 3. For What Purposes Do We Use Your Personal Data?

All collected information is used only for the purposes for which you provided it to us or as we informed you at the time of data collection or as explained in this privacy policy.

These purposes include:

- To respond to your request for services or the performance of contracts.
- To respond to your request when you register or sign up for our digital media: the personal data you provide will be used to provide you with the benefits and privileges associated with registration and to ensure that you receive the communications you selected at the time of registration or that are automatically associated with your registration (newsletter subscription, account creation, participation in a sweepstake or competition, invitation to or participation in an event organized by Pernod Ricard, brand news, personal offers, invitations to special occasions, pre-sales).
- When you make online purchases on our websites: we use your personal data to process your order and deliver your products in accordance with the contract.

- Feedback, questions, or comments via our contact form and our “Tell us” compliance reporting system: if you contact us via an online contact form, we will use your information to respond to your request or comment.

To enable you to receive marketing information about Pernod Ricard or our products when you have requested it:

- If you have used the “send to a friend” function: Personal data collected for one-time use (typically name and email address) will only be used once (to send the message) and will not be retained by us thereafter;
- If you use a QR code displayed on a Pernod Ricard product: we use your personal data to send you more information about the product on which the QR code was placed or about other products if you have also agreed to this;
- If you enter personal data on iPads available in heritage centers or distilleries, we use this data to send you more information about the products;
- In addition to the purposes for which you have provided your personal data, we may also offer you the opportunity (via a checkbox or otherwise) to use your information for other activities or services than those you originally expressed interest in. For example, if you sign up for a competition or promotion, you may also be invited to sign up for newsletters or notifications from the originating digital medium or from other websites or Pernod Ricard products. If you choose to take advantage of these additional services, we will use your information to provide them.

To better support you in Pernod Ricard’s legitimate interest.

We may also use your email address to send you messages related to contract processing or administration (confirmation emails or unsubscribe confirmations for certain registrations or activities, newsletter sign-ups, account creation, participation in a sweepstake or competition, invitation to or participation in an event organized by Pernod Ricard, brand news, personal offers, invitations to special events, pre-sales), as well as service-related announcements (notification of changes to our privacy policy, discontinued features or programs of our digital media, changes to our online services or technical support policies, or other similar changes) or promotional communications (subject to your consent, where legally required). Collectively, we refer to these forms of communication in this privacy policy as “transactional communications.”

To ensure that your personal data remains accurate and up-to-date and to avoid duplicates in our database, we may check during each of your interactions with one of our companies whether your personal data is still accurate or can be supplemented with information you have additionally provided.

Where legally permissible, this may also mean that we occasionally combine, update, or otherwise enhance your personal data collected through our digital media with data we receive from other sources. For example, we may combine purely demographic or survey-derived information (such as age, gender, household information, and other interests) that is not linked to any personal data about you with personal data collected in other contexts (such as during the registration of your account).

We may use your personal data, the aforementioned combined information, and/or demographic data for our internal marketing and demographic studies, as well as for the constant improvement, personalization, and customization of the products and services we offer, to better suit your personal needs. This does not apply if you object to such use of your data in accordance with Article 9 of this Privacy Policy.

4. What happens if you do not wish to share your personal data?

If you choose not to provide personal data upon request, you may not be able to participate in certain activities and personalized elements, and it is also possible that our digital media will only be available with reduced services or special offers. For example, if you are not willing to share your email address with us, you will not be able to receive a newsletter or register in other ways in our digital media. However, to simply browse our digital media and learn more about Pernod Ricard and our products, you do not need to actively provide us with any personal data.

5. To whom do we share your personal data and why?

Pernod Ricard will not share your personal data with third parties unless we have explicitly informed you, it is explicitly explained in this Privacy Policy or in the Cookie Policy, or you have given us explicit permission.

For the purposes described in Article 3, Pernod Ricard may share your personal data with the Pernod Ricard Group, namely when: the information we collect as described in this Privacy Policy may come from the company to which you provide it. If you agree, it may also be made accessible by this company to other companies of the Pernod Ricard Group to provide you with news and promotional information about their products or programs that you are interested in. If you wish to object to such sharing and use of your information, please send a request in accordance with Article 9 of this Privacy Policy with your name, customer reference, and your objection regarding the sharing of your information and its use for sending marketing information to all or part of the companies of the Pernod Ricard Group (possibly specifying the relevant companies).

Pernod Ricard may also share your personal data with third parties, but only under the following circumstances:

- We may use service providers, agents, or contractors to provide support for the internal operations of our digital media and to assist us in managing these or the various available features, programs, and promotions. Each of these third parties must at all times adhere to the same security requirements as Pernod Ricard for your personal data and is, where necessary, bound by appropriate legal agreements to keep your personal data confidential and secure and to process it only according to Pernod Ricard's explicit instructions;
- When we conduct a joint or co-sponsored program or promotion in our digital media with another company, organization, or third party, and as part of this event, we collect and process personal data, we may share your personal data with our partner or sponsor. If, as part of such a promotion, your personal data is collected (or shared) by another company than Pernod Ricard, we will inform you of this when collecting the personal data;



- When we conduct a promotion with another company, we may provide a separate link to that company's privacy policy and invite you to read this policy before sharing any personal data, as we cannot guarantee that this company adheres to the same privacy standards. If you do not want your information to be collected or shared by another company, you are free to decide not to consent or participate in an event at the time of data collection or request.
- We may also share your personal data if we are legally required to do so, or if we believe in good faith that such action is necessary to respond to claims or to protect the safety and rights of Pernod Ricard, our customers, or the public;
- In the event of a merger or acquisition of all or part of Pernod Ricard by another company, or in the event that Pernod Ricard sells all or part of its business, the acquirer would have access to the information held by the respective Pernod Ricard company, which may include personal data to the extent legally permissible. Personal data may also be transferred in the context of a corporate restructuring, insolvency proceedings, or similar events, if legally permissible and in accordance with applicable laws;
- We may share aggregated demographic data and information from surveys with third parties, but this data is only available in anonymous form. The aggregated data we share may include anonymous data collected through cookies or other tracking technologies, see Article 2.

6. Are your personal data sent to recipients in other countries and why?

Pernod Ricard is a global company, and your personal data may therefore be transferred across international borders. This may also mean a transfer to countries that have different levels of data protection laws compared to the country from which you submitted your personal data. Your personal data may also be transferred between various companies of the Pernod Ricard Group located in different countries. Pernod Ricard takes appropriate technical and organizational measures to ensure the security of personal data both during transmission and at the receiving location by using contractual clauses formulated according to applicable laws. You can view the list of countries where Pernod Ricard operates companies that may receive your personal data [here](#).

Our main service providers for the operation of our digital media are located in the United States. The transfer to these service providers is based on contractual frameworks according to applicable laws. They are contractually obligated to maintain a high standard of data protection and (among other obligations) to act only according to Pernod Ricard's instructions, as well as to continuously take all necessary technical measures to keep your personal data secure.

Depending on whether the Pernod Ricard company applies the so-called "double opt-in" procedure, the data processing process is described below:

No Double Opt-In

- The data is collected at a contact point as described in Article 1.
- The data is sent directly to the global consumer database for deduplication. The servers of the global consumer database are located in Ireland.

- After deduplication, only data for which an opt-in has been received is transferred to the Salesforce Marketing Cloud (SFMC) for activation. The SFMC servers are located in the United States.

#### With Double Opt-In

- The data is collected at a contact point as described in Article 1.
- The data is transferred to the SFMC to send the email with the opt-in request to the contact.
- After two weeks, there are two possibilities:
  - If the contact has not confirmed the opt-in in the confirmation email, the data is deleted from the SFMC.
  - If the contact confirms the opt-in by clicking a link in the email, the data is sent to the global consumer database for the deduplication process. The servers of the global consumer database are located in Ireland.
- After deduplication, only data for which an opt-in has been received is transferred to the Salesforce Marketing Cloud (SFMC) for activation. The SFMC servers are located in the United States.

#### 7. How long do we store your personal data?

We may store personal data that you have sent us through our digital media in our databases. We store your personal data as long as your account is active, as long as we have a contract with you, or as long as it is necessary to provide the services you have requested, answer questions, resolve problems, or provide you with improved and new services. We may also need to store your personal data for a reasonable period if it is necessary to fulfill our legal and regulatory obligations, resolve disputes, enforce our agreements, or for other data maintenance purposes.

Therefore, we may store your personal data for a reasonable period even if you have stopped using Pernod Ricard's services or digital media. Other recipients of your personal data described in Article 5 may store your data for a longer period if it is necessary to fulfill the purpose for which you allowed us to share your personal data, or if it is necessary to fulfill their legal obligations, resolve disputes, enforce rights, or for other data maintenance purposes, if legally required.

If you would like us to use your personal data to provide our services, please contact us as described in Article 9. We would like to remind you that, as described in Article 9, you also have the right to have your personal data deleted or corrected at any time.

#### 8. How do we protect your personal data?

Pernod Ricard takes all necessary technical and organizational measures to ensure the confidentiality and security of your personal data. These measures include: (i) storing your personal data in secure operating environments that are not accessible to the public and can only be entered by authorized Pernod Ricard personnel, our agents, and contractors, and (ii) verifying the identities of registered users before they can access their personal data.

#### 10. How can you exercise your rights regarding your personal data?

If your personal data has been processed based on your consent, you can withdraw this consent at any time by contacting Pernod Ricard (contact details can be found above).

You can access your personal data as processed by us by contacting Pernod Ricard. If you request such access, we will provide you with all information required by law about the purpose of the processing, the categories of data processed, the categories of recipients, the data retention periods, and your right to correction, deletion, or restriction of access.

You can also contact Pernod Ricard with the following requests:

- You can request that your personal data be corrected if it is incorrect, incomplete, or outdated.
- You can request the deletion of your personal data if (i) your personal data is no longer needed for the purpose of data processing, (ii) you have withdrawn your consent to the data processing based solely on this consent, (iii) you have objected to the data processing, (iv) the processing of your personal data is unlawful, or (v) the personal data must be deleted to comply with legal requirements of Pernod Ricard. Pernod Ricard will take reasonable steps to inform other companies of the Pernod Ricard Group about the deletion.
- You can request the restriction of processing if (i) the accuracy of your personal data is disputed, to give Pernod Ricard the opportunity to verify the accuracy, (ii) despite the fact that the processing is unlawful, you prefer a restriction of your personal data over deletion, (iii) you want Pernod Ricard to retain your personal data because you need it in connection with the defense of legal claims, or (iv) you have objected to the processing, but Pernod Ricard is conducting a review to determine whether there are still legitimate grounds for processing that may override your right.
- If you no longer wish to receive newsletters, announcements, or other communications and/or services from our digital media, please do not opt-in to receive such communications or services at the time of registration. If you have opted in and later wish to opt-out, please click the “unsubscribe” link in our communications.
- With each email communication we send you, we provide the option to unsubscribe from future communications. Simply follow the opt-out process or instructions provided in the email.
- Please note that if you have participated in a program involving third parties and have consented to receive future communications directly from these third parties, you will need to contact them directly to opt-out of such communications in the future. The relevant process should be described in the third party’s privacy policy.

#### 11. How do we handle information from children?

Our website is not directed at children and minors, and we do not knowingly collect personal data from minors. You must be at least 18 years old to create a user account and participate in activities and transactions on our digital media. By creating a user account or participating in activities or transactions on our digital media, you confirm that you are at least 18 years old and



fully authorized to agree to our terms of use and privacy policy. If we are notified or otherwise become aware that a minor has submitted personal data to us through our digital media, we will delete this personal data.

12. Do we use links to third-party websites?

Our digital media may contain links that direct you to other websites or services controlled and operated by third parties. This includes links from advertisers, sponsors, and partners who use our logos as part of a co-branding agreement. We have no control over these third parties, and your use of their websites and features is subject to their privacy policies, which are posted on the respective websites. We are not responsible or liable for the privacy practices or business practices of any third-party-operated website. Therefore, you should proceed with caution and review the privacy policy applicable to the external website before submitting personal data.

13. How can you contact us or the relevant supervisory authority?

If you have any questions, complaints, or comments regarding this privacy policy or our data collection practices, please contact us in writing at Pernod Ricard or by email at: [datenschutz@pernod-ricard-deutschland.com](mailto:datenschutz@pernod-ricard-deutschland.com)

You are hereby informed that you can also file a complaint with the supervisory authority of your home country if you have concerns about the processing of your personal data by Pernod Ricard.