

Pernod Ricard, in its role as Data Controller, respects your right to privacy when you use our digital media (such as our websites, our mobile applications, our social media pages, and any online registration forms for our events) and communicate electronically with us. This policy also covers the offline activities that involve our collection, storage and/or use of your personal data.

The purpose of this Privacy Policy is to inform you how Pernod Ricard Nigeria Limited, a company duly organized under the laws of the Federal Republic of Nigeria, with its business address at 7th Floor South Point Tower, 40B Adetokunbo Ademola, Victoria Island, Lagos, Nigeria, collects, stores, uses and processes your personal information (“Personal Data”) provided or collected through any digital or manual platform operated by or on behalf of Pernod Ricard (“Digital Media”) Reference to digital media under this policy necessarily includes manual media and platforms as well.

Topics

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

Personal Data is collected only for the purposes set out in Section 3 below and each time you use any of the features or services offered by our Digital Media.

The types and amount of information collected when using the above-mentioned features and services may be updated and vary depending on the activities of Pernod Ricard.

You consent to our use of your personal data when you use of digital media, complete forms, attend our events, and/or or provide us with your personal data with or without request. Most of the Personal Data we process is directly collected from you, in particular whenever you fill out a form on our Digital Media or contact us. We also collect, with your consent, Personal Data concerning you whenever you browse on our Digital Media through the use of tracking technologies (in this respect see section 2 below as well as our Cookie Policy).

Subject to applicable law requirements, we may also use various tools that allow us to target the ads we display on social media. Your identity, contact and social media information (i.e. your profile data, social demographics, behavioral data and interests) are processed in this context.

2. How and why do we use tracking technologies?

Pernod Ricard uses tracking technologies such as cookies, IP addresses or log files. Tracking technologies help us tailor our Digital Media to your personal needs and offer you contents adapted to your interests.

- We use cookies to better understand how visitors use our Digital Media and the tools and services offered, improve their use and functionality, and provide you content adapted to your interests. 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 such as letting you browse 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 disable cookies in the [\[Pernod Ricard Cookie Policy\]](#).

- 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;
- 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 information such as (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 files 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.

3. For what purposes do we use your Personal Data and on what legal grounds?

We collect information about you to:

- **Respond to your request for services or to perform our contract (based on our legitimate interest, to carry out precontractual or contractual measures with you)**
 - Handle any claims or complaints you make about our products and/or services.
- **Send you transactional or administrative communications (based on our legitimate interest or to carry out precontractual or contractual measures with you):** (e.g. confirmation email when you sign up for, or unsubscribe from, a specific service or feature), 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).
- **Allow us to send you marketing information when you consent:**
 - We may use your Personal Data, with your consent, to send you announcements and promotional information about our products and services by email. 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 hosting the promotion or from other websites.
 - When you use the third-party sponsorship ("*Send to a friend*") feature: the Personal Data collected is used only once to send the communication and is not further retained by us, as appropriate according to local law;
- **To fulfil our legitimate interest in better serving your needs:**
 - Whenever this new processing is compatible with the processing for which you have given your consent, we may occasionally combine, update, or otherwise enhance the Personal Data collected through our Digital Media with data we receive from outside records or third parties. For instance, we may combine purely 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 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.

- **Manage and track your inquiries and comments, including where relevant regarding compliance, via contact forms or contact email addresses:** for the performance of a contract in particular.

We will 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.

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 or take advantage of personalized features, and the Digital Media services and special services offered to you may be limited. 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. However, to simply browse our Digital Media and learn more about Pernod Ricard 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 disclose your Personal Data and why?

- **To affiliates within the Pernod Ricard Group**

Pernod Ricard may share your Personal Data within the Pernod Ricard Group, including its affiliates worldwide, for the purposes mentioned in Section 3, .

- **To third parties**

Pernod Ricard may also share your Personal Data with third parties, but only in the following circumstances:

- For marketing purposes, with our service providers, if you gave us your consent.
- For support purposes: We may use service providers, agents or contractors to provide support 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. Any such third party shall at all times provide the same levels of security for your Personal Data as Pernod Ricard and, where required, are bound by a legal agreement to keep your Personal Data private, secure and to process it only on the specific instructions of Pernod Ricard;
- For joint and co-sponsored programs and promotional purposes, with our partners and service providers: When we run a joint or co-sponsored program or promotion on our Digital

Media with another company, organization, or other reputable third party; and, as part of this event, collect and process Personal Data, we may share your Personal Data with our partner or sponsor, subject to your consent when required. If your Personal Data is being collected by (or is shared with) a company other than Pernod Ricard as part of such promotion, we will let you know this at the time your Personal Data is collected;

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- For litigation and safety purposes: We may also disclose your Personal Data 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 Pernod Ricard, its 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 were to sell or dispose of all or a part of the Pernod Ricard business, the acquirer would have access to the information maintained by that Pernod Ricard 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.

6. Is your Personal Data sent to recipients outside the Nigerian territory?

Pernod Ricard is a global company and your Personal Data may be transferred across international borders to countries with a different level of data protection than the country from where you submitted your Personal Data. Your Personal Data may also be transferred between different companies of the Pernod Ricard Group located in different countries. Pernod Ricard takes the appropriate measures to maintain security of the Personal Data both during transit and at the receiving location by implementing contractual clauses as set out by the European Commission, in accordance with applicable law.

Our main service providers for the operation of our Digital Media are based in the United States, as are our partners. Transfers of personal data to these service providers and partners are implemented in accordance with applicable laws and rely on standard contractual clauses as set out by the European Commission. Such service providers and partners, when acting as processors, are also bound by a contract that ensures a high standard of privacy protection and requires (amongst other provisions) that they act only on Pernod Ricard's instructions and implement all technical measures necessary on an ongoing basis to keep your Personal Data secure.

7. How long do we keep your Personal Data?

We will store the Personal Data that you sent us via our Digital Media 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 or resolve problems, or else to 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.

We may thus retain your Personal Data after you stop using Pernod Ricard's services or our Digital Media according to the statute of limitations

8. How do we secure your Personal Data?

Pernod Ricard takes all necessary technical and organizational measures to protect the confidentiality and security of your Personal Data collected via our Digital Media. These efforts include but are not necessarily limited to: (i) storing your Personal Data in secure operating environments to which the public does not have access, but only authorized Pernod Ricard 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.

9. What are your 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**, without impact on lawfulness of processing based on consent before its withdrawal.
- You can request **access to** your Personal Data
- You can request **the rectification of 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 Pernod Ricard. Pernod Ricard will take reasonable steps to inform the other entities of the Pernod Ricard Group of such erasure.
- You can request **the restriction** of the processing (i) in the event the accuracy of your Personal Data is contested to allow Pernod Ricard 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 Pernod Ricard 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 Pernod Ricard conducts verification to check whether it has legitimate grounds for such processing which may override your own rights if the data processing is based on the legitimate interest of Pernod Ricard.
- You can request **the portability** of the Personal Data you provided to us, if the Personal Data processing is based on your consent or the performance of a contract and is carried out by automated means (i.e. excluding paper files).
- 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.
- **You have the right to object to the processing of your Personal Data by us, at any time, for direct marketing purpose, for marketing purpose based on profiling, or if the data processing is**

based on the legitimate interest of Pernod Ricard (except if we can demonstrate compelling legitimate grounds for the processing).

10. How we treat children's Personal Data?

Our Digital Media are not intended for children under the legal drinking age ("Minor"), so we do not knowingly collect personal data from Minors. You must be at least eighteen years old 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 through our Digital Media, we will delete such Personal Data.

11. How can you contact us or lodge a complaint with the relevant Supervisory Authority ?

If you have any questions, complaints, or comments regarding this Privacy Policy or our information collection practices, please contact groupdpo@pernod-ricard.com

You are informed that you can also lodge a complaint with the Supervisory Authority if you have any concern about the conditions of processing of your Personal Data by Pernod Ricard.

12. Changes to our Privacy Policy

We keep our Privacy Policy under regular review, and we will place any updates on this web page.

This Privacy Policy was last updated in December 2021.