PERNOD RICARD INDIA PRIVACY POLICY

Last Updated: October 1 2026

Welcome to Pernod Ricard India Limited's Privacy Policy ("**Privacy Policy**" or "**Policy**").

Pernod Ricard India Limited (formerly known as Pernod Ricard India Private Limited), a company incorporated under the Companies Act, 1956 and having its Corporate Office at: 12th Floor, Tower B, DLF Cyber Park, 405-B, Sector 20, Udyog Vihar, Phase III, Gurugram-122010, Haryana, and Registered Office at: Atelier, No. 10, Level 1, Wordmark 2, Aerocity, New Delhi-110037 and its affiliates (all together hereafter referred to as "**PRI**", "**Pernod Ricard**", "**We**", or "**Our**") respects the Data Subject's / Principals' right to privacy and is committed to protecting the confidentiality and integrity of Personal Data (refers to any data about an individual who is identifiable by or in relation to such data as defined hereinbelow).

This Privacy Policy applies to the collection, recording, storage, retrieval, use, alignment or combination, indexing, sharing, erasure or destruction of an Individual's ("**You**", and "**Your**") personal data when communicating electronically with us or interacting with any **Digital Media** (such as our websites, our mobile applications, our pages on the social network, any online forms and microsites to register to our events, etc.) operated by Pernod Ricard whether directly or through service providers on our behalf.

"**Personal Data**" means any information relating to an identified or identifiable natural person ("**data subjects / principal (s)**"), and an "identifiable natural person" is one who can be identified, directly (for example: name and surname) or indirectly (for example: by a telephone number or an identifier such as employee number or a postal address).

"**Applicable Data Protection Law**" refers to all laws applicable to data protection including, but not limited to (i) The Information Technology Act, 2000 and the Rules thereof ("**IT Act**") unless repealed by the authorities, (ii) Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27th, 2016 on the protection of natural persons regarding the processing of personal data and on the free movement of such data ("**General Data Protection Regulation**") and Law No. 78-17 of January 6th, 1978 relating to information technology, files and freedoms.

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1. Which Personal Data do we collect about You and how do we collect it?

As per PRI business practices, we currently process Personal Data, which includes:

S. No.	Type of Personal Data	Personal Data Attributes
1.	General Personal Information	Title, full name, phone number, gender, email ID, date of birth, address, facial photograph and demographic location details.
2.	Financial Information	Payment data, transactional data, bank account number, GSTIN, PAN number, rewards if You are third-party personnel.
3.	Identification Document/ Information	License details or other identity card details, including Your identification document number, the country it was issued in and the expiry date (if applicable).
4.	Location and Device Information	Device location (where You have permitted access to such location), operating system, IP address, browser information, etc. for the services offered by our Digital Media.
5.	Usage Information	Demographic information about the users of our Digital Media, which we may obtain from third parties such as Google or social media that You use ("Usage Information"). Usage Information may consist of the pages You viewed, the time You viewed them, which beverage information or other content You accessed or provide, in what language, including demographic information about You such as Your age, gender and interest areas, where available and what pages You looked at before viewing the current page, etc.
6.	Feedback or Social Media Interaction	Data You choose to share with us by means of interacting with our social media pages or our chatbot, or by completing a survey. We may also collect demographic and age information of users interacting with our social media pages.
7.	Recruitment Data	In case You apply to any of our openings, we shall process Your Personal Data to assess if You are suitable for the position. In such scenarios, we shall collect Your educational qualifications, professional history, contact details, marital status, spouse name, etc.

In case You share Personal Data with us which relates to another person, You are responsible for ensuring the person knows and has consented in writing to us collecting and processing their Personal Data in accordance with the provision of this Privacy Policy.

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

of information collected for the above-mentioned features and services may be updated and vary depending on the activities of Pernod Ricard.

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.

- Subject to Your consent where required by applicable law, our Digital Media use cookies and similar technologies ("cookies"). We use cookies to better understand how visitors use our Digital Media, and the tools and services offered and improve their use and functionality. Cookies are small files that are placed on Your device that serve several 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 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 logs 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 longs, 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 vou. Log files are used internally only and are not associated with any particular user.

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

We collect information about You 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.), 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.).

- Send You transactional or administrative communications (e.g. confirmation email 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).

- Allow us to send You marketing information when You consent.

- In addition to the purpose for which You submitted Your Personal Data, You may also be given the option (through an unticked check box against such purpose) 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 hosting the promotion or from other websites. 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.

- When You use a QR Code or equivalent feature displaced on PRI communication, we use Your Personal Data to send You more information post capturing Your explicit consent for sharing such details via SMS. In scenarios where the QR code or equivalent feature display details on browser, we may process Your device details such as demographic details.

- Subject to Your consent when required, 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 registrations. We may use the combined above-mentioned information and/or demographic information for our internal statistical and demographic studies and to constantly improve, personalize, and customize the services we provide You to better meet Your needs. Feedback, questions, or comments through our "Contact Us" form and our "Tell Us" Compliance reporting, if You contact us via an online contact form, Your Personal Data is used to respond Your inquire or comment.

- We may conduct profiling based on monitoring Your browsing activities on our Digital Media to better understand Your preferences, interests and adapt our marketing communications to Your profile, unless You withdraw consent as mentioned in Section 9 of this Privacy Policy. Pernod Ricard may process Personal Data involving automated decision making, including for the performance of a contract (e.g. avoid fraudulent payment) or subject to Your explicit consent, to better serve Your needs in accordance with Your preferences.

- We are committed to ensuring 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 to us.

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.

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, other 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?

- **Within the Pernod Ricard Group:** Pernod Ricard may share for the purposes mentioned in Section 3 Your Personal Data within the Pernod Ricard Group, including its affiliates worldwide.

- **With third parties:** Pernod Ricard may also share Your Personal Data with third parties, but only in the following circumstances:
  i. **For marketing purposes** if You gave us Your consent.

  ii. **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 functions, programs and promotions available on it. Any such third party shall always 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.

iii. **For joint and co-sponsored programs and promotional purposes**: 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.

iv. **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 safety rights of Pernod Ricard, its customers, or the public.

v. **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 transferred to other countries and why?

Pernod Ricard Group is a global company, and Your Personal Data may be transferred across international borders. It may be transferred to countries not blacklisted by the Central Government of India that may have a different level of data protection laws than the one existing in 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. The transfer of personal data to these service providers are implemented in accordance with applicable laws in India, and rely on standard contractual clauses as set out by the European Commission. Such service providers 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, provide improved and new services. We may also retain Your Personal Data in accordance with our internal retention schedule as necessary to comply with our legal and regulators' obligations, resolve disputes and enforce our agreements.

We may thus retain Your Personal Data after You stop using Pernod Ricard services or our Digital Media according to the period defined in the Applicable Data Protection Laws or any other applicable laws or is necessary for compliance with legal or regulatory obligations, or for the establishment, exercise or defense of legal claims.

8. How do we protect Your Personal Data?

Pernod Ricard takes all necessary 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 Pernod Ricard employees, and our agents service providers and contractors; and (ii) verifying the identities of registered users before they can access the Personal Data, we maintain about them.

In case of a personal data breach, Pernod Ricard will share timely notification with the effected users and concerned supervisory authorities as per the jurisdiction.

9. What are Your rights regarding Your Personal Data?

You have certain rights in relation to Your Personal Data and how we process it, depending upon the jurisdiction You are in.

- **Right to access:** You can request copy of the Personal Data we hold about You at any time. This includes access to information about the processing, such as purpose, categories of data and recipients, duration of the processing, data subjects' rights and appropriate safeguards in case of third-country transfers.

- **Right to withdraw consent**: Where the processing of Your Personal Data is based on Your consent, You have the right to withdraw such consent at any time. Upon withdrawal, we will cease processing Your Personal Data unless such processing is required to do so under Applicable Data Protection Law or any other applicable law or is necessary for compliance with legal or regulatory obligations, or for the establishment, exercise or defense of legal claims.

- **Right to rectification**: You have the right to demand that Your Personal Data be rectified if it is inaccurate or outdated and/or to have it completed if it is incomplete.

- **Right to erase**: You have the right to obtain the erasure of Your Personal Data. This right applies in particular circumstances, especially if Your Data is no longer necessary

for Pernod Ricard or where consent has been withdrawn, subject to applicable laws. This right is not absolute, and we may be required to retain Your Personal Data under Applicable Data Protection Law or any other applicable law, or where it is necessary for compliance with legal or regulatory obligations, or for the establishment, exercise or defense of legal claims.

To get in touch with us about these rights, please contact us as per the details provided in **Section 11**. To help us confirm Your identity and to ensure that the Personal Data is only disclosed to authorized individuals, we may request Your full name or any other information required.

10.How do we process 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 twenty-one 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. If You believe we might have any information from or about a Minor user, please contact us at **DPO1@pernod-ricard-india.com**.

11.How can You contact us or lodge a complaint to the relevant Authority?

If You have any questions, complaints, grievances or comments regarding this Privacy Policy or our information processing practices, please contact us by sending an email to: **DPO1@pernod-ricard-india.com.**

12.How will you be informed of changes to this Privacy Policy?

We keep our Privacy Policy under regular review, and any updates to this policy will be published on this web page. **This Privacy Policy was last updated on October 2026**.

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