

## **Pernod Ricard UK Limited**

### **Privacy Policy**

We take your privacy very seriously and we respect your right to privacy when you use our websites, our mobile applications, our pages on social networks, online forms and whenever else you communicate electronically with us (our “Digital Services”). That’s why we’ve developed this Privacy Policy to explain how we collect, store, use and process the Personal Data you share with us through our Digital Services.

Please read this Privacy Policy carefully as it contains important information on who we are and how and why we collect, store, use and share your Personal Data. It also explains your rights in relation to your Personal Data and how to contact us or supervisory authorities in the event you have a complaint.

“We”, “us” and “our” refer to Pernod Ricard UK Limited, Pernod Ricard SA and Pernod Ricard SA’s affiliates (these affiliates are collectively referred to as the “Pernod Ricard Group”).

We collect, use and are responsible for certain Personal Data about you. When we do so we are subject to the General Data Protection Regulation, which applies across the European Union (including in the United Kingdom as retained UK legislation or otherwise) and we are responsible as ‘controller’ of that Personal Data for the purposes of those laws.

Before using our Digital Services, please read this Privacy Policy. If you do not agree to this Privacy Policy or our Cookies Policy, please do not use our Digital Services.

We are the data controller when processing your Personal Data in the conditions described in this Privacy Policy, which includes any Personal Data you submit to this website or another website that links you to this Privacy Policy, such as a microsite that we use to run a promotion or competition (the “Website”).

#### **1. What Personal Data do we collect about you and how?**

Personal Data means any information that can be used to personally identify you or contact you online or elsewhere.

We may collect and use the following Personal Data about you:

- your name and contact information, including postal address, email address and telephone numbers.
- information to enable us to check and verify your identity, e.g. your date of birth

- your gender information, if you choose to give this to us
- location data
- your billing information, transaction and payment card information
- information to enable us to undertake credit or other financial checks on you
- your personal or professional interests, household, lifestyle, habits and preferences
- your contact history, purchase history, and saved items
- information from accounts you link to us, e.g. Facebook
- information about how you use our website, IT, communication and other systems
- your responses to surveys, competitions and promotions
- your IP address and your mobile/tablet/device ID
- information provided to us for your attendance at events, including which events you attend as well as information about access or dietary requirements.

This Personal Data is required to provide products and Digital Services to you. If you do not provide Personal Data we ask for, it may delay or prevent us from providing products or services to you.

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 your Personal Data is collected**

### **Personal Data we collect from you**

We collect most of this Personal Data directly from you—in person, by telephone or email and/or via our website and apps. This usually occurs when you take part in one of our promotional activities or subscribe to one of our Digital Services, for example:

- Registration or sign-up online: e.g. mobile app, websites, social media or subscribing to a newsletter specific to our Digital Services or creating an account to be a member of a club;
- ‘Send to a friend’ marketing communications;
- Sweepstake and contest;

- Buying products or services online;
- When doing e-commerce on certain of our websites;
- Using a QR Code displayed on products;
- Events (invitation form or online forms on tablets filled out by our representatives with your input);
- Tastings;
- Feedback, questions, enquiries, surveys or comments through 'Contact us';
- Any other request that requires the submission of Personal Data.

The type and amount of information we collect for the features listed above will vary and depends on the activity.

#### **Personal Data we collect from other sources**

We may also collect information:

- directly from a third party, e.g.: "Send to a friend" marketing communications or a third party sign-up form from one of our partners;
- from a third party with your consent, e.g. your bank or building society
- from cookies on our website (see below - **How and why do we use tracking technologies?**)
- via door entry systems and reception logs;
- from automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems; or
- from one of our Pernod Ricard Group affiliates.

We may occasionally purchase the contact details of people who might be interested in hearing from us. Before purchasing such information, we will check the wording used when your information was originally collected, to make sure that we only contact people who have actively expressed an interest in receiving information from third parties.

We may also receive information if you have provided permission to other organisations to share it with us. Before providing permission to such third party organisations to share your personal information, you should check their privacy notices carefully.

Subject to applicable laws, we may use a variety of technologies that collect and provide information about how our Digital Services are accessed and used by you. We may also use demographic information about who uses our Digital Services, which we get from third parties such as Google or social media that you use (we call this “Usage Information”).

Usage Information may consist of the pages you have visited, the time you visited them and which beverage information (or other content) you accessed or provided. It also includes which language you use, demographic information about you (such as your age, gender and interest areas, where available) and which pages you have visited before you visited the current page.

We collect this information to gain a better idea of how people interact with our brands so we can then tailor and improve them accordingly. Most Usage Information that we collect can't be linked to you individually, but if we can link it to you, then we treat it in accordance with this Privacy Policy.

### **How and why do we use tracking technologies?**

We use tracking technologies such as cookies, IP address recording or log files, to gather technical information such as your web browser type and which operating system you use, the webpage you came from, your path through our website and your Internet Service Provider. This is so we can improve the functionality of our websites and better understand how visitors like you use our Digital Services and the tools they offer.

Often, individuals will interact with us in multiple ways and will provide us with personal information in different contexts. We may use your personal information to obtain a profile of your different interactions with us and to understand your preferences.

These tracking technologies help us tailor our Digital Services to your personal needs:

- Subject to your consent where required by applicable law, our Digital Services use cookies and similar technologies (“**cookies**”). Cookies are small files placed on your device which serve a number of purposes, such as remembering your preferences. Cookies let you enjoy a richer and more tailored browsing experience, as well as help to accurately measure your behaviour on our website. You can learn more about which cookies we use and how to disable them in our Cookies Policy.
- An IP address is a number used on a network to identify your computer every time you connect to the Internet. We may keep track of Internet Protocol (IP) addresses to (among other things): (i) troubleshoot technical issues, (ii) maintain website safety and security, (iii) restrict access to our Digital Services to certain users, (iv) track location and behaviour, analyse, segment and target advertising to customers, and, (iv) better understand how our Digital Services are utilised e.g. using Google Analytics;

- We (or a third party on our behalf) may collect and use your mobile/tablet device ID to provide a more tailored browsing experience, to alert you to nearby events or promotions and for reporting and analysis;
- We (or a third party on our behalf) may collect information in the form of logs files that record activity and gather statistics about browsing habits. These entries are generated anonymously, and help us gather (among other things) (i) your web browser type and operating system, (ii) information about your session (such as the URL you came from, the date and time you visited our Digital Services, and which pages you have viewed and for how long), and, (iii) other similar navigational or click-stream data. We also use log file information for our internal marketing and demographic studies, so we can constantly improve and customise the online services we offer you. Log files are only used internally, and are not associated with any personally identifiable individual.

### **3. For what purpose do we use your Personal Data?**

Under data protection law, we can only use your Personal Data if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

Generally, the information we collect is only used for any purpose for which you submitted it to us, for any purpose made clear to you at the point it was collected or here in this Privacy Policy. These purposes may include:

- When you register or sign-up via our Digital Services: the Personal Data you give is used to provide you with the benefits that typically come along with registration. This includes information on the products and brands that you have signed up to (and, if you have opted-in, to receive information about other Pernod Ricard products), the ability to send, receive and personalise communications you select at the time of registration or that automatically come with your registration. For example, subscription to a newsletter, creation of an account, participation in a sweepstake or contest, invitation to or attendance at an event organised by us or on our behalf;

- When you are selected or invited to attend an event we will use your Personal Data to provide you with details, tickets and entry information and to provide the organisers with information to allow them to verify your attendance;
- When you enter a sweepstake or contest we use your Personal Data to identify unique entrants and to inform winners and others of the outcome;
- When you use the 'Send to a friend' feature: Personal Data for one-time use (typically, names and email addresses) is used only once (e.g., to send a message) and is not retained by us;
- When using e-commerce on some of our websites: we (or a third party on our behalf) will use your Personal Data to create your account, facilitate the purchase process, manage your order and deliver your products under the contract you have with us (or the third party) and to understand your purchase history. We may use automated decision making to detect fraudulent activity or to secure payment by verifying card-holder details where it is necessary for entering into or performing a contract with you;
- When you use a QR Code or equivalent feature displayed on our products: we use your Personal Data to send you more information on the products where the QR code or equivalent feature was displayed or other Pernod Ricard products (if you opt-in to receive that information);
- When you submit Personal Data on the iPads or other mobile devices available in Heritage Centres or distilleries: this is used to send you more information on the relevant products;
- 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, your information is used to respond to your inquiry or comment;
- Display targeted ads about Pernod Ricard's products and services on the social media you are registered on and measuring ad performance. If you do not object to the use of your Personal Data for targeted advertising purposes, we will pass on your identification data (hashed) to the social media whose marketing tools we use (see section 5 below), that is to say your surname, first name, contact details and date of birth. Subject to your consent, social media can also identify you through the cookies placed on our Digital Media. Once your data is shared on social media, it is used to enable such media, at your initiative, to find you among other users, and (i) to show you ads about our products and services when you browse the relevant social media, and (ii) to identify, based on your profile on the relevant social media (where you live, age, gender, language, socio-demographic characteristics, interests and behavior), lookalikes who may also be interested by Pernod Ricard's ads.

Social media also provide us with reports on the results of our advertising campaigns (click-through rate, conversion rate, audience profile, etc.) to enable us to improve our future campaigns. In the context of these activities, we act as a joint controller together with each social media. We do not, however, collect or access at any time the Personal Data concerning you held by the social media concerned and relating in particular to your profile or your behavior on such social media. This type of Personal Data processing is based on our legitimate economic interest in offering relevant advertising content on social media, tailored to a specific audience.

When you submit your Personal Data, you may also be given the option (through a tick box or other consent mechanism) to have your information used for an activity or service different from the one you are requesting. For example, if you enter a contest to win a prize, you may also be invited to sign up for a newsletter about other products. If you choose to have your information used for another activity or service in this way we will use your information to provide them to you.

In addition, when you submit your Personal Data, you may be given the option (through a tick box or other consent mechanism) for your information to be used for other Pernod Ricard products. If you choose this option we (and other Pernod Ricard Group affiliates) will use your information to provide you with information and promotions regarding other Pernod Ricard products.

We may also use your email address to send you transactional or administrative communications such as confirmation emails when you sign up for, or unsubscribe from, a specific registration or activity. We may also use it for certain service-related announcements, such as updates to our Privacy Notice, discontinued features or programs on our Digital Services, changes to our online services or technical support policies.

We retain your personal data in our global consumer database which allows us to ensure that your Personal Data remains accurate and up to date and to share your Personal Data with appropriate Pernod Ricard group affiliates. To avoid duplication in our database, we may use information about each of your interactions with one of our Pernod Ricard Group affiliates to check whether your Personal Data is still accurate. We will use that information to complete, enhance or update your Personal Data with the additional information you might have provided.

Subject to applicable laws, this may include occasionally combining, updating, or otherwise enhancing the Personal Data collected through our Digital Services with anonymised data we get 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) not linked to any personal information about you with Personal Data collected in other cases (such as during account registration).

We may also use your Personal Data, the combined information referred to above and/or demographic information for our internal marketing, segmentation, analysis and demographic studies. This helps us to constantly improve, personalise, and customise the products and services we provide.

#### **Legitimate interests - managing our business**

In relation to a number of uses of Personal Data we refer to above we are doing this on the basis that it is in our legitimate interests – or those of a third party – for us to do so. A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. These interests cover a number of aspects of our business operations, namely:

- Ensuring that we are as efficient as we can be so we can deliver the best Digital Service and products for you that we can and understanding our customers and the users of our Website;
- To allow us to provide bespoke Digital Services and products where requested by you, to personalise your experience and to tailor the content, offers and promotions we send to you promoting our products and services;
- Protecting our commercially valuable information and also our intellectual property;
- Preventing and detecting fraud and/or criminal activity that could be damaging for us and for you;
- Understanding how our business is performing and considering how to improve our performance; and
- Ensuring we are able to keep up to date with our customers and contacts and developments in their organisations.

#### **Promotional communications**

We may use your Personal Data to send you updates (by email or post) about our products and Digital Services, including exclusive offers, promotions or new products and Digital Services.

We have a legitimate interest in processing your Personal Data for promotional purposes. This means we do not always need your consent to carry out promotional activities. However, where consent is needed, we will ask for this consent separately and clearly.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us at [ukconsumerfeedback@pernod-ricard.com](mailto:ukconsumerfeedback@pernod-ricard.com)



- using the 'unsubscribe' link in emails or 'STOP' number in texts

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products or Digital Services in the future, or if there are changes in the law, regulation, or the structure of our business.

#### **4. What happens if you do not wish to share your Personal Data with us?**

If you choose not to submit any Personal Data when requested, you may not be able to participate in certain activities or use some of the personalised features of our Digital Services. This may also limit the services and special offers we can provide you. For example, if you refuse to share your email address, you will not be able to receive any of our newsletters or otherwise register for our Digital Services. However, you do not need to give us any Personal Data to simply browse our websites and learn more about us and our products.

#### **5. Who do we disclose your Personal Data to and why?**

We will **never** share your Personal Data with any third party that intends to use it for direct marketing purposes, unless we have specifically told you and you have given us explicit permission to do this.

We may share your Personal Data with affiliates within the Pernod Ricard Group. The purposes are explained in Articles 2 and 3 above. The information we collect as described in this Privacy Policy may come from the entity to which you provide it but may also be made available, subject to your consent, through such entity to other entities of the Pernod Ricard Group to provide you with news and promotional information about their products or programs you have shown interest in.

If you wish to withdraw your consent to such sharing and use of your information, please address your request as indicated in Article 9 of this Privacy Policy. Please tell us if you are withdrawing your consent for us to share your Personal Data with all of the affiliates in the Pernod Ricard Group to provide you with news and promotional information or just some of those affiliates (and, in that case, please indicate which ones).

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

- We may use third parties to help deliver our products or Digital Services to you, e.g. payment service providers, warehouses and delivery companies;
- For targeted advertising purposes: we share your Personal Data with the following social media: Facebook, Instagram, Twitter, to display targeted ads on them about our products and services to you

and people with a similar profile to you. In this context, the social media and Pernod Ricard are acting as joint data controllers. We can provide you, on request, with a copy of the data processing agreements entered into with such social media. 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 websites.

- We may share your Personal Data with third parties who provide programmatic advertising services to serve you with relevant advertising;
- We may use or work with service providers, agents or contractors or other third parties e.g. marketing and digital agencies or third party data providers as described above, to support the internal operation of our Digital Services, and to assist us with administering, enhancing or tailoring them or the various functions, programs and promotions available on them. Any such third party must provide appropriate levels of security for your Personal Data and, where required, are bound by a legal agreement to either delete or keep your Personal Data private, secure and to process it only on our specific instructions;
- When we run a joint or co-sponsored program or promotion on our Digital Services with another company, organisation, or other reputable third party, we may collect and process Personal Data and share it with that partner or sponsor as part of the event. If your Personal Data is being collected by (or is shared with) a company other than one that is part of the Pernod Ricard Group as part of any such promotion, we will let you know at the time it is collected;

When we run a promotion in partnership with a third party outside the Pernod Ricard Group, we may provide a separate link to their privacy policy which you should read before you share any Personal Data. The operators of other sites may collect information from you which will be used by them in accordance with their own data protection policy or privacy policy. If you do not want your information to be collected by or shared with a company other than the Pernod Ricard Group, you can choose not to opt in or participate in these events at the time the Personal Data is collected or requested;

- We may also disclose your Personal Data if we are required to do so by law or by law enforcement agencies or regulatory bodies, or if such action is necessary to comply with legal or regulatory processes, to respond to or pursue any claims, or to protect the safety or rights of us, our employees, customers, or the public;
- In the event of a merger or acquisition of all or part of us by another company, or in the event that we were to sell or dispose of all or a part of our business. In this case the acquirer would have access

to the information maintained by us, which could include Personal Data, subject to applicable law. Similarly, Personal Data may be transferred as part of a corporate reorganisation, insolvency proceeding, or other similar event, if permitted by and done in accordance with applicable law;

- We may share aggregated demographic or survey information with third parties, but this information is in anonymous form and does not contain any Personal Data. The aggregate information that we share may include anonymous information that is captured through the use of cookies and other similar tracking technology, as explained in Article 2.

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

We and our affiliates in the Pernod Ricard Group are a global group and your Personal Data may be transferred across international borders. It may be transferred to countries that have different data protection laws to 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.

We will, however, ensure the transfer complies with data protection law both during transit and at the storage location and all Personal Data will be secure. Our standard practice is to use standard data protection contract clauses that have been approved by the European Commission.

Our main service providers for the operation of our Digital Media are based in the United States. The transfers of personal data to these services providers are implemented in accordance with applicable laws 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 a member of Pernod Ricard Group's instructions and implement technical measures necessary on an ongoing basis to keep your Personal Data secure.

## **7. How long do we keep your Personal Data?**

We may store the Personal Data that you send to us via our Digital Services in our databases. We will not retain your Personal Data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of Personal Data.

We retain your Personal Data as long as your account is active, for the duration of a contract with you or however long it takes to provide you with the products or services requested, to answer queries or resolve problems, to show that we treated you fairly, to keep records required by law and to improve or offer new services.

We may also need to retain your Personal Data to comply with our legal and regulatory obligations, resolve disputes, enforce our agreements, and similar records management purposes.

We may also retain your Personal Data for a reasonable period after you stop using our services or our Digital Services. After this period, your Personal Data will be deleted from all systems in the Pernod Ricard Group.

If you ask us to delete your information in accordance with your rights set out in Article 9 below, we will retain basic information on a suppression list to record your request and to avoid sending you unwanted materials in the future.

### **8. How do we keep your Personal Data secure?**

We have appropriate security measures to prevent your Personal Data from being accidentally lost, or used or accessed unlawfully. These include: (i) storing your Personal Data in secure operating environments that are not available to the public and that are only accessible to authorised employees, our agents and contractors; and, (ii) verifying the identities of registered users before they can access Personal Data we store about them.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### **9. Your rights**

You have the following rights, which you can exercise free of charge:

#### **You can ask us to:**

- provide a copy of your personal data (the right of access) including the categories of data that are used in profiling or decision making processes
- correct any mistakes in your personal data including in the profile
- delete your personal data—in certain situations
- restrict processing of your personal data—in certain circumstances, e.g. if you contest the accuracy of the data
- provide you with a copy of the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations

#### **You can object:**

- at any time to your personal data being processed for direct marketing purpose, for marketing purpose based on profiling, for the purposes of targeted advertising on social media;
- in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests

You can also contest the result of an automated decision.

If your Personal Data has been processed on the basis of your consent, you can withdraw your consent at any time.

We hope that we can resolve any query or concern you may raise about our use of your information. You also have the right to complain to the supervisory authority in the European Union where you work, normally live or where any alleged infringement of data protection laws occurred.

If you would like to exercise any of your rights please email us on [UKconsumerfeedback@pernod-ricard.com](mailto:UKconsumerfeedback@pernod-ricard.com).

Your objection (or withdrawal of consent) may mean we cannot provide the products or services you have requested of us or you may not be able to use the services we offer. We will advise you where this is the case. In certain circumstances even if you withdraw your consent we may still be able to process your Personal Data if required or permitted by law or for the purpose of exercising or defending our legal rights or meeting our legal and regulatory obligations.

If you participated in a program that involved a third party and you agreed to receive communications from that third party, you will need to contact them directly to opt-out. This process should be outlined in the third party's privacy policy.

#### **10. How do we treat children's information?**

Our Digital Services are not intended for children under the age of majority ("Minor"), so we do not knowingly collect Personal Data from Minors. You must be at least eighteen years old (or, if the legal drinking age where you live is higher, you must be at least that age) to create an account and engage in activities and transactions on our Digital Services. By creating an account or engaging in activities or transactions, you confirm that you are at least eighteen years old (or, if the legal drinking age where you live is higher, that you are at least of legal drinking age) and are fully able to enter into, comply with and be legally bound by any terms of use made available to you and this Privacy Policy. If we are notified or learn that a Minor has submitted personal data to us through our Digital Services, we will delete their Personal Data.

### **11. Do we link to other third party websites?**

Our Digital Services may contain links that will direct you to other websites or services that are operated and controlled by third parties. This includes links from advertisers, sponsors and partners that may use our brands or logo(s) as part of a co-branding agreement.

The operators of other sites may collect information from you which will be used by them in accordance with their own data protection policy or privacy policy. We have no control over these third parties, and your use of their websites and features are subject to the privacy policies posted on those websites. We are not responsible or liable for the privacy practices or business practices of any third-party website. Therefore, you should exercise caution and review the privacy policies applicable to those external websites you visit, before you provide your Personal Data.

### **12. How can you contact us?**

If you have any questions, complaints, or comments about this Privacy Policy or our how we collect and manage your Personal Data, please contact us by writing to:

Data Privacy Champion, Pernod Ricard UK Limited, Building 7 Chiswick Park, 566 Chiswick High Road, London, W4 5YG or sending an email to: [UKconsumerfeedback@pernod-ricard.com](mailto:UKconsumerfeedback@pernod-ricard.com)

### **13. Changes to this Privacy Policy**

This privacy notice was last updated: 8 Sept 2022.

We may change this Privacy Policy from time to time, so please check back regularly to keep informed of updates to this Privacy Policy and our Cookies Policy.