

PRIVACY POLICY

When you use Pernod Ricard's digital media (our website, mobile applications, our social media content, or online forms for registering for our events, "Digital Media") or communicate with us, we respect your privacy. We have therefore created this Privacy Policy to inform you about how Pernod Ricard Swiss collects, stores, and processes the personal data you provide to us via Digital Media operated by Pernod Ricard.

"We," "us," and "our" refer to **PERNOD RICARD SWISS SA** ("Pernod Ricard"), Richtiarkade 16, 8304 Wallisellen, Switzerland.

We collect and use certain personal data about you and are responsible for that data. In these cases, we are subject to Swiss data protection law.

Pernod Ricard contact details:

Pernod Ricard Swiss SA
Richtiarkade 16
8304 Wallisellen/Zurich
Telephone: +41 44 575 80 00
Fax: +41 44 575 80 88
Email: info-swiss@pernod-ricard.com

Commercial Register: Commercial Register of the Canton of Zurich
Registration number: CHE-105.992.014

You can send data protection inquiries to:
info-swiss@pernod-ricard.com

External Data Protection Officer:

Data Protection Officer Pernod Ricard Germany
Telephone: +49 221 806 499
Email: datenschutz@pernod-ricard-deutschland.com

TÜV Rheinland i-sec GmbH
Am Grauen Stein
51105 Cologne
<http://www.tuv.com/informationssicherheit>

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 about changes to this Privacy Policy or the Cookie Policy. Otherwise, we encourage you to review this Privacy Policy and the Cookie Policy regularly to stay informed about any updates and how we may use your data.

Pernod Ricard and/or its affiliated companies (see attached list "Pernod Ricard Group"), where they share your personal data under the conditions described below, act as the controller(s) for any personal data you submit to Pernod Ricard. This also applies to personal data you enter on this website or on any other website linked to this Privacy Policy, such as a microsite we use to run a promotion or contest (the "Website").

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:

- Your name and contact details, including postal address, email address, and telephone numbers, and where applicable, company details
- Information that enables us to verify your identity, such as your date of birth
- Information about your gender, if you choose to provide it
- Your contact type (B2C, B2B, B2E, shareholder)
- Date of data collection and last update date
- Your 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)
- Your preferences and personal interests
- Your preferred means of communication
- Your Net Promoter Score, whether the contact is part of a luxury program, whether the contact participates in a travel program, opt-in status, brand(s) the contact has subscribed to, a 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 use any of the many features and services of our Digital Media, including:

- Registering or signing up for our Digital Media
- “Send to a friend” features
- Sweepstakes and competitions
- Subscribing to a program or newsletter
- Making purchases online via our websites
- Connected products (Pernod Ricard products that interact with the end consumer; data may also be collected at this touchpoint)
- Event organization (invitation forms or online forms on tablets completed by our hostesses)
- Training sessions
- Tastings
- Brand event experiences at home
- Brand homes
- Feedback, requests, surveys, questions, or comments via our contact form
- Any other request requiring the submission of Personal Data

Please note that our services may change from time to time. In such cases, we will update this Privacy Policy accordingly.

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

We may also receive information from other organizations if you have given them permission to share it with us. Before granting such permission, you should carefully review the privacy policies of those third parties.

Subject to applicable laws, we may use a range of technologies that collect and provide information about how you access and use our digital services. We may also use demographic information about users of our digital services that we receive from third parties such as Google or the social media platforms you use (we refer to this as “Usage Information”).

Usage data includes the pages you visit, the time you visit them, and the beverage information (or other content) you access or provide. It also includes the language you use, demographic information about you (such as age, gender, and areas of interest, where available), and which pages you visited before accessing the current page.

2. How and why do we use tracking technologies?

We collect this information to better understand how people interact with our brands so that we can adapt and improve them accordingly. Most of the usage data we collect cannot be linked to you personally; however, if we are able to associate it with you, we will treat it in accordance with this Privacy Policy.

Pernod Ricard uses tracking technologies—namely cookies, IP addresses, and log files—to collect certain information, including your browser type, operating system, referring page, navigation path through our site, and your ISP domain. This helps us improve the user experience and functionality of our website and 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.

People often interact with us in different ways and provide personal data in various contexts. We may use your personal data to create a profile of your interactions with us and to better understand your preferences.

These tracking technologies help us tailor our digital services to your personal needs:

- **Cookies:** We use cookies to improve the usability and functionality of our Digital Media and to better understand how visitors use our services. Where legally required, we only use cookies and similar technologies (“cookies”) with your consent. Cookies are small files placed on your device that serve various purposes, such as enabling more efficient navigation, storing your preferences, and generally improving your user experience. The use of cookies allows for smoother visits and helps us better understand your behavior on our site. For more information about the cookies we use and how to disable them, please refer to the Pernod Ricard Cookie Policy.
- **IP addresses:** An IP address is a string of numbers used by computers on a network to identify your device whenever you access the internet. We may collect IP addresses for the following purposes:

1. troubleshooting technical issues,

2. maintaining website security,
 3. restricting access to our Digital Media for certain users,
 4. better understanding how our Digital Media is used, and
 5. geographically targeting audiences.
- **Device IDs:** We (or third parties on our behalf) may collect and use your mobile/tablet device ID to provide you with a personalized browsing experience, inform you about events or promotions near you, and generate reports and analytics.
 - **Log files:** We (or third parties acting on our behalf) may also collect information in the form of log files, which record activities on our Digital Media and gather statistics about user behavior. These logs are generated anonymously and help us collect information such as:
 1. a user's browser type and operating system,
 2. session details (such as the original URL, date and time of visits, and which pages were viewed and for how long), and
 3. other similar navigation or clickstream data.

We use the information collected through log files for internal marketing and demographic analysis, enabling us to continually improve and customize the online services we provide to you. Log files are used internally only and are not linked to any specific user.

3. For what purposes do we use your personal data?

Under data protection law, we may only use your personal data when we have a legitimate reason to do so, for example:

- to comply with legal and regulatory obligations;
- to perform a contract with you or 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 your consent.

In general, the data we collect is used only for the purpose for which you provided it, or for a purpose communicated to you at the time of collection or in this Privacy Policy.

These purposes include, in particular:

- to respond to your request for services or to perform contracts;
- to respond to your request when you register or sign up on our digital media: the personal data you provide will be used to grant you the benefits and privileges associated with registration and to ensure you receive the communications you selected at the time of registration or that are inherent to your registration (newsletter subscription, account creation, participation in sweepstakes or competitions, invitations to or participation in events organized by Pernod Ricard, brand communications, personalized offers, invitations to special occasions, pre-sales);

- if you make online purchases via our websites: we use your personal data to process your order and deliver your products as agreed;
- feedback, questions, or comments via our contact form and our “Tell us” compliance reporting system: if you contact us through an online 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, if you have requested this;
- if you have used the “send to a friend” feature: 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 stored afterward;
- if you scan a QR code on a Pernod Ricard product: we use your personal data to provide you with more information about the product or, if you have consented, about other products;
- if you enter personal data on iPads available in heritage centers or distilleries, we use it to send you more information about the products;
- in addition to the purposes for which you originally provided your personal data, we may also give you the option (via a checkbox or other means) to use your data for additional activities or services beyond those you initially requested. For example, when entering a competition or promotion, you may also be invited to subscribe to newsletters or notifications from the hosting digital media or other Pernod Ricard websites or products. If you choose to use these additional services, we will use your data accordingly;
- to better support you in Pernod Ricard’s legitimate interest;
- we may also use your email address to send you messages related to contract performance or administration (such as confirmation emails or unsubscribe confirmations for certain registrations or activities, newsletter sign-ups, account creation, participation in competitions, invitations to or participation in Pernod Ricard events, brand communications, personalized offers, invitations to special events, pre-sales), as well as service-related announcements (such as updates to this Privacy Policy, discontinued features or programs, changes to our online services or technical support policies, or other similar updates) or promotional communications (subject to your consent where legally required). Collectively, we refer to these as “transactional communications” in this Privacy Policy.

In addition, when submitting your personal data, you may be given the option (via a checkbox or other consent mechanism) to allow your information to be used for other Pernod Ricard products. If you choose this option, we (and other companies within the Pernod Ricard Group) will use your data to send you information and promotions about other Pernod Ricard products.

To ensure that your personal data remains accurate and up to date and to avoid duplicates in our database, we may check during each interaction with you whether your data is still correct or can be supplemented with additional information you provide.

To the extent permitted by law, this may also mean that we occasionally combine, update, or otherwise enhance the personal data we collect through our digital media with data obtained from other sources. For example, we may combine purely demographic or survey-based

information (such as age, gender, household data, and other interests) that is not linked to any personal data with personal data collected in other contexts (e.g. during account registration).

We may use your personal data, the combined information described above, and/or demographic data for internal marketing and demographic studies, as well as to continually improve, personalize, and adapt the products and services we offer to better meet your 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 when requested, you may not be able to participate in certain activities or personalized features, and our Digital Media may only be available with limited services or special offers. For example, if you are unwilling to share your email address, you will not be able to receive a newsletter or register in other ways on our Digital Media. However, you do not need to actively provide any personal data in order to browse our Digital Media and learn more about Pernod Ricard and our products.

5. With 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 of this, it is clearly explained in this Privacy Policy or the Cookie Policy, or you have given your explicit consent.

For the purposes described in Article 3, Pernod Ricard may share your personal data within the Pernod Ricard Group. This means that the information collected as described in this Privacy Policy may originate from the entity to which you provided it. However, with your consent, it may also be made accessible to other companies within the Pernod Ricard Group in order to provide you with marketing messages and information about products or programs of interest to you. If you wish to object to such sharing and use of your data, please submit a request in accordance with Article 9 of this Privacy Policy, including your name, customer reference, and details of your objection regarding the sharing and use of your information for marketing purposes (specifying, if applicable, the relevant companies).

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

- **Service providers:** We may use service providers, agents, or contractors to support the internal operations of our Digital Media and to help manage the various features, programs, and promotions. These third parties are required at all times to adhere to the same data protection standards as Pernod Ricard and, where necessary, are bound by legal agreements to keep your personal data confidential and secure and to process it only according to Pernod Ricard's instructions.
- **Joint programs or promotions:** If we run a joint or co-sponsored program or promotion with another company, organization, or third party and collect personal data as part of that activity, we may share your personal data with our partner or sponsor. If your data is collected by (or shared with) a company other than Pernod Ricard, we will inform you at the time of collection.
- **Third-party privacy policies:** When carrying out promotions with partner companies, we may provide a separate link to their privacy policy. We encourage you to review these

policies before sharing any personal data, as we cannot guarantee that these companies adhere to the same data protection standards. You are free to decline consent or refrain from participating in such activities if you do not wish your data to be shared.

- **Legal obligations:** We may 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 legal claims or to protect the rights, safety, or property of Pernod Ricard, our customers, or the public.
- **Corporate transactions:** In the event of a merger, acquisition (in whole or in part), or sale of Pernod Ricard or its business, the acquiring entity may gain access to the information held by the relevant Pernod Ricard entity, including personal data where legally permitted. Personal data may also be transferred as part of a corporate restructuring, insolvency proceeding, or similar event, provided this is done in compliance with applicable laws.
- **Aggregated data:** We may share aggregated demographic data and survey information with third parties; however, this data is provided only in anonymous form. Such aggregated data may include anonymous information collected through cookies or other tracking technologies (see Article 2).

6. Will your personal data be transferred to recipients in other countries and why?

We and our affiliated companies within the PERNOD RICARD Group operate globally, and your personal data may be transferred across international borders. It may be transferred to countries that have data protection laws different from those of the country from which you originally submitted your data. Your personal data may also be shared between different Pernod Ricard Group companies in various countries.

However, we will ensure that such transfers comply with applicable data protection laws both during transmission and at the place of storage, and that your personal data remains secure. As a rule, we use standard contractual clauses approved by the European Commission.

Depending on whether the respective Pernod Ricard entity applies the so-called “**double opt-in**” procedure, the data processing workflow is as follows:

Without double opt-in

- Data is collected at a contact point as described in Article 1.
- The data is sent directly to the global consumer database for deduplication purposes. The servers of this database are located in Ireland.
- After deduplication, only data for which consent (opt-in) has been provided is transferred to Salesforce Marketing Cloud (SFMC) for activation. The servers of SFMC are located in the United States.

7. How long do we store your personal data?

We do not retain your personal data for longer than necessary for the purposes stated in this Privacy Policy. Different types of personal data may be subject to different retention periods.

We may store personal data you provide through our Digital Media in our databases. Your personal data will be stored for as long as your account remains active, as long as we have a

contractual relationship with you, or as long as necessary to provide the requested services, respond to inquiries, resolve issues, or offer improved and new services.

We may also retain your personal data for a reasonable period if required to comply with legal or regulatory obligations, resolve disputes, enforce agreements, or for other data management purposes.

Therefore, we may retain your personal data for a reasonable period even after you have stopped using Pernod Ricard's services or Digital Media. Other recipients described in Article 5 may retain your personal data for a longer period if necessary to fulfill the purpose for which you consented to its sharing or to meet their legal obligations, resolve disputes, enforce rights, or for other legally permitted data management purposes.

After this period, your personal data will be deleted from all systems within the PERNOD RICARD Group.

If you wish to request that we use your personal data to provide services, please contact us as described in Article 9. Please also note that, as stated in Article 9, you have the right at any time to request that your personal data be corrected or deleted.

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:

1. Storing your personal data in secure operating environments that are not publicly accessible and can only be accessed by authorized Pernod Ricard personnel, agents, and contractors.
2. Verifying the identity of registered users before granting them access to their personal data.

We have also established procedures for dealing with suspected data security breaches. Where legally required, we will notify you and the relevant supervisory authorities in the event of a suspected data breach.

9. How can you exercise your rights regarding your personal data?

If your personal data is processed based on your consent, you may withdraw this consent at any time by contacting Pernod Ricard (contact details provided above).

You can access your personal data processed by us by contacting Pernod Ricard. If you request access, we will provide you, in accordance with legal requirements, with all relevant information about the purposes of processing, categories of data processed, categories of recipients, data retention periods, and your rights to rectification, deletion, or restriction of processing.

You may also contact Pernod Ricard with the following requests:

- You may request that your personal data be corrected if it is inaccurate, incomplete, or outdated.
- You may request the deletion of your personal data if:
 1. it is no longer needed for the purposes for which it was processed,

2. you withdraw your consent (where processing is based solely on consent),
3. you object to the processing,
4. the processing is unlawful, or
5. deletion is required to comply with a legal obligation.

Pernod Ricard will take reasonable steps to inform other companies within the Pernod Ricard Group about the deletion.

- You may request restriction of processing if:
 1. the accuracy of your personal data is contested (to allow verification),
 2. you prefer restriction over deletion despite unlawful processing,
 3. you need Pernod Ricard to retain your data for legal claims, or
 4. you have objected and a review is ongoing to determine whether legitimate grounds override your rights.
- If you no longer wish to receive newsletters, announcements, or other communications and/or services from our Digital Media, you can choose not to opt in at registration. If you have already consented and wish to withdraw later, please use the “unsubscribe” link provided in our communications.
- Each email we send includes the option to unsubscribe from future communications. Simply follow the instructions included in the message.

Please note that if you participated in a program involving third parties, you may have consented to receive communications directly from those third parties. To unsubscribe, you will need to contact the third party directly and follow the process outlined in their privacy policy.

10. How do we handle information about children?

Our website is not intended for children or 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 or transactions on our Digital Media. By creating an account or participating in activities, you confirm that you are at least 18 years old and authorized to agree to our Terms of Use and Privacy Policy.

If we become aware that a minor has provided personal data through our Digital Media, we will delete that data.

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

Our Digital Media may contain links directing you to other websites or services operated by third parties. This includes links from advertisers, sponsors, and partners that use our logos as part of co-branding agreements.

We have no control over these third parties, and your use of their websites and services is subject to their own privacy policies, which are published on their platforms. We are not responsible or liable for the privacy or business practices of any third-party websites.

We therefore recommend that you carefully review the applicable privacy policy before submitting any personal data.

12. How can you contact us?

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:

info-swiss@pernod-ricard.com

13. Changes to this Privacy Policy

This Privacy Policy was last updated on **[07.09.2022]**.

We may update this Privacy Policy from time to time. Please visit our website regularly to stay informed about updates to this Privacy Policy and our Cookie Policy.