

# ONLINE PRIVACY POLICY

## PERNOD RICARD GERMANY

When you use Pernod Ricard's Digital Media (our website, our mobile applications, our content on social networks or online forms for registrations for our events, "**Digital Media**") or communicate with us, we respect your privacy. We have therefore established this Privacy Policy to inform you about how Pernod Ricard Deutschland GmbH ("**Pernod Ricard**", "**we**" or "**our**") collects, stores and processes the Personal Data you provide to us through the Digital Media operated by Pernod Ricard.

### The contact details of Pernod Ricard are:

**Pernod Ricard Deutschland GmbH,  
Habsburgerring 2, 50674 Köln**

**Tel.:** +49 221 43 09 09-0

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

**Register court:** Amtsgericht Köln

**Register number:** HRB 38302

**Sales tax identification number:** UST-ID/VAT DE 148 719 988

**Ms. Claudia Oudey**

**Tel.:** +49 221 430909 125

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

Before using our Digital Media, please carefully read this Privacy Policy (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 modify this Privacy Policy or the Pernod Ricard Cookie Policy at any time. If you have signed up for our newsletter, we will notify you of any changes to this Privacy Policy or the Pernod Ricard Cookie Policy. Otherwise, we invite you to periodically review this Privacy Policy or the Pernod Ricard Cookie Policy to ensure that you are aware of any changes and how we may use your information.

Pernod Ricard and/or affiliated companies (see attached list "**Pernod Ricard Group**"), to the extent they share your Personal Data under the terms described below, is/are in authority with respect to any Personal Data you send to Pernod Ricard.

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

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

Personal Data is collected in accordance with this Privacy Policy when you choose to use any of the many features and services of our Digital Media, namely:

- Register or sign up for our Digital Media;
- Send to a friend;
- Competitions and contests;
- Subscribing to a program or newsletter;
- When you shop online on our sites;
- Connected products (this stands for Pernod Ricard products that interact with the end consumer. Data is also collected at this touch point);
- Organization of events (invitation forms or online forms on tablets filled in by our hostesses);
- Trainings;
- Tastings;
- Brand Event Experience at home;
- Brand Home;
- Feedback, requests, surveys, questions or comments via our contact form;
- Any other request that requires the submission of Personal Data.

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

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

In accordance with the applicable laws, we use a range of technologies which collect and provide information about how our Digital Media is accessed and how you use it. Demographic information about users of our Digital Media is also collected, which we may obtain from third parties, namely Google, AdForm, Bluekai and the social media they use („User Information“). User information may consist of the pages they visited, the duration of viewing, what beverage information or other content you obtained or provided, in what language, demographic information about you (such as age, gender, areas of interest, if available), and what pages they viewed before visiting the current page so that we can get a better sense of how users interact with our brands. Most of the user information we collect typically cannot be linked to you personally, but when we can relate to it, we treat the information as Personal Data for purposes of this Privacy Policy.

## 2. Why and how do we use tracking technology?

Pernod Ricard uses tracking technologies, namely cookies, IP addresses or log files, to collect certain information, namely your browser type, operating system, originating site, path through our site, domain of ISP, to improve the user experience and functionality of our website and to improve the understanding of how visitors use our Digital Media and the tools and services offered on it. Tracking technologies help us tailor our Digital Media to your personal needs.

- We use cookies to improve the usefulness and functionality of our Digital Media and to enhance the understanding how visitors use our Digital Media and the tools and services offered on it. To the extent required by law, our Digital Media uses cookies and similar technologies („cookies“) only with your consent. Cookies are small files placed on your device that serve several purposes, such as your more efficient navigation between our sites, in storing your preferences and generally improving your user experience. The use of cookies in our Digital Media allows you to have more seamless visits and us to better track your behaviour on our site. If you would like to learn more about the cookies we use and how we use them, as well as how to disable cookies, please read the [Pernod Ricard Cookie Policy](#);
- An IP address is a sequence of digits used by computers on a network to identify your computer each time you dial into the Internet. We may collect Internet Protocol (IP) addresses for the following purposes: (i) troubleshooting technical problems, (ii) maintaining the security of our website, (iii) restricting access to our Digital Media for certain users, (iv) to improve the understanding how our Digital Media is used, and (v) geographic targeting.
- We (or third parties on our behalf) may also collect information in the form of log files that record the activity of our Digital Media and collect statistics about the usage patterns of our visitors. These records are generated anonymously and help us collect the following information: (i) a user's browser type and operating system, (ii) visitor session information (such as original URL, date, and time of visit to our Digital Media, and which pages you viewed on our Digital Media and over what period of time), and (iii) other similar navigation or click-stream data. We use the information collected in the log file for our internal marketing and demographic studies so that we can continually improve and customize the online services we provide to you. Log files are only used internally and are not associated with any specific user.

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

Any information collected will only be used for the purposes for which you provided the information to us or as we told you at the time of collection or as explained in this Privacy Policy. These purposes are as follows:

- To respond to your request for services or performance of contracts
  - to respond to your request when you register or log in to our Digital Media: the Personal Data you provide will be used to provide you with the benefits and privileges that accompany registration and to ensure that you can receive the communicati-

- ons that you selected at the time of registration or that automatically accompany your registration (newsletter registration, creation of an account, entry into a sweepstakes or contest, invitation to or participation in an event organized by Pernod Ricard, brand news, personalized offers, invitations to special events, presales);
  - when you make online purchases on our websites: we use your Personal Data to process your order and deliver your products in accordance with the contract;
  - feedback, questions or comments via our contact form and „Tell us“ compliance reporting system: if you contact us via an online contact form, we will use your information to respond to your inquiry or comment.
- To enable you to receive marketing information about Pernod Ricard or our products when you have requested to receive it:
  - if you have used the „send to a friend“ function: Personal Data collected for a one-time use (typically name and email address) will only be used once (to send the message) and will not be retained by us thereafter;
  - if you use a QR Code that was displayed on a Pernod Ricard product: we will use your Personal Data to send you more information about the product on which the QR Code was displayed or about other products if you have also consented to this extent;
  - if you enter Personal Data on iPads available at Heritage Centers or Distilleries, we will use them to send you more information about the products;
  - in addition to the purposes for which you submitted your Personal Data, we may also offer you the opportunity (via a checkbox or otherwise) to use your information for activities or services other than those in which you originally expressed interest. For example, if you sign up for a contest or promotion, you may also be invited to sign up for newsletters or alerts that originate from the aligning Digital Medium, or from other websites or Pernod Ricard products. If you choose to take advantage of these additional services, we will use your information to provide them.
- To improve the support for you in Pernod Ricard’s legitimate interest.
- We may also use your email address to send you contractual or administrative messages (confirmation emails or unsubscribe confirmations for certain registrations or activities, sign-up for a newsletter, create an account, enter a sweepstake or contest, invitation to or participation in an event organized by Pernod Ricard, brand news, personal offers, invitations to special events, presales), also as service-related announcements (notification of changes to our Privacy Policy, discontinued features or programs of our Digital Media, changes to our online services or technical support policies, or other similar changes) or promotional communications (subject to your consent as required by law). Collectively, we refer to these forms of communication in this Privacy Policy as „transactional-related communication.“

To ensure that your Personal Data remains accurate and up-to-date, and to avoid duplicates in our database, we may check each time you interact with one of our companies to see if your Personal Data is still accurate or can be supplemented with additional information you provide.

To the extent permitted by law, this may also mean that we may occasionally combine, update, or otherwise enhance your Personal Data collected through our Digital Media with information we obtain from other sources. For example, we may combine purely demographic or questionnaire information (for example, age, gender, household information and other interests) that is not linked to any Personal Data about you with Personal Data collected in other instances (for example, during the registration of your account).

We may use your Personal Data, the above combined information and/or demographic data for our internal marketing and demographic studies, as well as to constantly improve, personalize and customize the products and services we offer to better suit your personal needs. This does not apply if you object to such use of your data in accordance with Art. 9 of this Privacy Policy.

#### **4. What happens if you do not want 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 and personalized items, and it is also possible that our Digital Media will only be available with reduced services or special offers. For example, if you are unwilling to share your email address with us, you will not be able to receive newsletters or otherwise register with our Digital Media. However, to just browse our Digital Media and learn more about Pernod Ricard and our products, you do not need to actively provide us with any Personal Data.

#### **5. With whom do we share your Personal Data with and why?**

Pernod Ricard will not share your Personal Data with third parties unless we have explicitly informed you of this, explicitly explained it in this Privacy Policy or Cookie Policy, or if you have given us explicit permission.

For the purposes described in Article 3, Pernod Ricard may share your Personal Data with the Pernod Ricard Group, namely when: the information we collect as described in this Privacy Policy may come from the company to which you provide it. However, if you consent, it may also be shared by that company with other Pernod Ricard Group companies to provide you with news and promotional information about their products or programs in which you are interested. If you wish to object to such disclosure and use of your information, please send a request in accordance with Article 9 of this Privacy Policy with your name, customer reference and your objection to the disclosure of your information and its use for sending marketing information to all or part of the companies of the Pernod Ricard Group (if applicable, with an indication of the relevant companies).

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

- We may use service providers, agents or contractors to provide support for the internal operations of our Digital Media and to assist us in administering them or the various features, programs and promotions available. Any such third party must always comply with the same security requirements as Pernod Ricard for your Personal Data and, to the extent required, is bound by appropriate legal agreements to keep your Personal Data confidential and secure and to process it only in accordance with Pernod Ricard's express instructions;
- If we conduct a joint or co-sponsored program or promotion on our Digital Media with another company, organization or other third party and if, as part of that event, we collect and process Personal Data, we may share your Personal Data with our partner or sponsor. If, as part of such a promotion, your Personal Data is collected by (or shared with) a company other than Pernod Ricard, we will inform you of this when we collect the Personal Data;
- If we are running a promotion in conjunction with another company, we may provide a separate link to that company's privacy policy and we invite you to read that policy before sharing any Personal Data because we cannot guarantee that they will also adhere to the same privacy standards. If you do not want your information collected by or shared with a company other than ours, you are free to choose not to consent or not to participate in an event up until the time the Personal Data is collected or requested;
- We may also share your Personal Data if we are required to do so by law or if we believe in good faith that such action is legally necessary to respond to claims or to defend the safety and rights of Pernod Ricard, our customers or the public;
- In the event of a merger or acquisition of all or part of Pernod Ricard by another company, or in the event that Pernod Ricard sells part or all of its business, the acquirer would have access to the information held by the relevant Pernod Ricard company, which may include Personal Data to the extent permitted by law. Personal Data may also be transferred in the context of a corporate restructuring, insolvency proceedings or similar events, if legally permitted and in compliance with applicable laws;
- We may share aggregate, demographic data and information from questionnaires with third parties, but this data is only in anonymous form. The aggregated data we share may include anonymous data obtained using cookies or other tracking technologies, see Art. 2.

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

Pernod Ricard is a global company and your Personal Data may therefore be transferred across international borders. This may include transfers to countries that have a different level of data protection laws compared to the country from which you transferred your Personal Data. Your Personal Data may also be transferred between different Pernod Ricard Group companies located in different countries. Pernod Ricard takes appropriate technical and organizational measures to ensure the security of Personal Data both during the transfer and at the receiving site by using contractual clauses formulated in accordance with applicable laws. You can view the list of countries in which Pernod Ricard operates businesses that may receive your Personal Data <https://webform-console.pernod-ricard.io/ Pernod-Ricard-HQ/PR-Legal/microsite/list-affiliates/v1>.

Our primary service providers for the operation of our Digital Media are in the United States. The transfer to these service providers is based on contractual arrangements under applicable laws. They are contractually obligated to maintain a high standard of data protection and (among other obligations) to act only in accordance with Pernod Ricard's instructions, and to take on an ongoing basis all technical measures necessary to keep their Personal Data secure.

Depending on whether the Pernod Ricard Company uses the so-called "Double-Opt-In" procedure, the data processing procedure is described below:

- No double opt-in
  - Data is collected at a point of contact as described in Art. 1.
  - Data is sent directly to the global consumer database for deduplication purposes. The servers of the global consumer database are in Ireland.
  - After deduplication, only data for which an opt-in has been received will be transferred to Salesforce Marketing Cloud (SFMC) for activation. The SFMC servers are in the United States.
- With double opt-in
  - Data is collected at a point of contact as described in Art. 1.
  - The data is transferred to SFMC to send the email with the opt-in request to the contact.
  - After two weeks, there are two options:
    - if the contact has not confirmed the opt-in in the confirmation email, the data will be deleted from the SFMC.
    - If the contact confirms the opt-in by clicking a link in the email, the data is sent to the global consumer database for the deduplication process. The global consumer database servers are in Ireland.
- After deduplication, only those Data are transferred to Salesforce Marketing Cloud (SFMC) for activation for which an opt-in has been received. The SFMC servers are in the United States.

## 7. How long do we store your Personal Data?

We may store Personal Data that you have sent to us through our Digital Media in our databases. We will retain your Personal Data for as long as your account is active, for as long as we have a contract with you, or for as long as is necessary to provide the services you have requested, answer questions, resolve problems, or provide you with improved and new services. We may also need to retain your Personal Data for a reasonable period as necessary to comply with our legal and regulatory obligations, resolve disputes, enforce our agreements, or for other data maintenance purposes. We may therefore retain your Personal Data for a reasonable period, even after you have stopped using the services or Pernod Ricard Digital Media. Other recipients of your Personal Data described in Article 5 may retain their data for a longer period of time if this is necessary to fulfil the purpose for which you authorized us to disclose your Personal Data or if this is necessary to comply with their legal obligations, dispute resolution, enforcement of rights or other data maintenance purposes, if legally required.

If you wish to request us to use your Personal Data to provide our services, please contact us as described in Art. 9. We would like to remind you that, as described in Art. 9, you are also entitled to have your Personal Data deleted or corrected at any time.

## 8. How do we protect your Personal Data?

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

## 9. How can you exercise your rights regarding your Personal Data?

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

You may access your Personal Data as processed by us by contacting Pernod Ricard. If you request such access, we will provide you with full information about the purposes of the processing, the categories of data processed, the categories of recipients, the data retention periods and your right to rectify, erase or restrict access, as required by law.

You may also contact Pernod Ricard with the following requests:

- You may request your Personal Data to be corrected if it is inaccurate, incomplete or out of date.
- You may request your Personal Data to be deleted if (i) your Personal Data is no longer needed for the purposes for which it was processed, (ii) you have withdrawn your consent to the processing of your Personal Data solely based on such consent, (iii) you have objected to the processing of your Personal Data, (iv) the processing of your Personal Data is unlawful, or (v) the Personal Data must be deleted in order for Pernod Ricard to comply with compelling legal requirements. Pernod Ricard will take reasonable steps to notify the other companies in the Pernod Ricard Group of the erasure.
- You may request the restriction of processing if (i) the accuracy of your Personal Data is in dispute in order to allow Pernod Ricard to verify its accuracy, (ii) despite the fact that the processing is unlawful, you would rather have your Personal Data restricted than erased, (iii) you wish, Pernod Ricard to retain your Personal Data because you need it in connection with defending legal claims, or (iv) you have objected to the processing but Pernod Ricard is conducting a review to determine whether there are still legitimate grounds for processing that may override your right.
- If you no longer wish to receive newsletters, announcements, or other communications and/or services from our Digital Media, please do not opt-in to receive such communications or services at the time of registration. If you have opted in and wish to opt out later, please use the "Unsubscribe" link in our communications.

- Along with each email communication we send to you, we will give you the opportunity to unsubscribe from future communications. Please simply follow the unsubscribe process or the instructions we provide in the email.

Please note, that if you have participated in a program involving a third party, you have consented in that context to receive communications directly from that third party in the future. It will be necessary for you to contact that third party directly to opt out of such communications in the future. The process for doing so is likely to be described in the third party's privacy policy.

#### **10. How do we handle data from children?**

Our website is not directed to children and minors, so we do not knowingly collect Personal Data from minors. You must be at least 18 years of age to create a user account and participate in activities and transactions on our Digital Media. By creating a user account or participating in activities or transactions on our Digital Media, you acknowledge that you are at least 18 years of age and fully authorized to agree to our Terms of Use and Privacy Policy. If we are notified or otherwise notice that a minor has submitted Personal Data to us through our Digital Media, we will delete that Personal Data.

#### **11. Do we use links to third party websites?**

Our Digital Media may contain links that direct you to other websites or services that are controlled and operated by third parties. This includes links from advertisers, sponsors and partners who use our logos as part of a co-branding arrangement. We do not control these third parties and your use of their websites and features are subject to their privacy policies, which are posted on their respective websites. We are not responsible or liable for the privacy practices or business practices on any website operated by a third party. Therefore, you should exercise caution and review the privacy policy applicable to the third-party website before submitting any Personal Data.

#### **12. How can you contact us or the responsible supervisory authority?**

If you have any questions, complaints or comments regarding this Privacy Policy or our data collection practices, please contact us by writing to Pernod Ricard or by email at: [datenschutz@pernod-ricard-deutschland.com](mailto:datenschutz@pernod-ricard-deutschland.com). You are hereby informed that you may also lodge a complaint with the supervisory authority in your home country if you have concerns about Pernod Ricard's processing of your Personal Data.