

## DATA PROTECTION AND PRIVACY POLICY

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Pernod Ricard Winemakers Spain, in its role as Data Controller, respects your right to privacy when you use our digital media (such as our websites, our mobile applications, our pages on the social network, any online forms to register to our events...) and communicate electronically with us.

The purpose of this Privacy Policy is to inform you how Pernod Ricard Winemakers Spain, S.A.U, a corporation duly organized under the laws of Spain, with its registered address at Paseo Mikeletegi, nº 71, 2ª planta, 20009 – San Sebastián (Spain) and its affiliates (all together "Pernod Ricard", "we," or "our") collect, store, use and process your Personal Data provided through any digital media operated by Pernod Ricard ("Digital Media").

### Topics

1. [What Personal Data do we gather about you and how do we collect it?](#)
2. [How and why do we use tracking technologies?](#)
3. [For what purposes do we use your Personal Data and on which legal grounds?](#)
4. [What happens if you do not wish to provide your Personal Data?](#)
5. [To whom do we disclose Your Personal Data and why?](#)
6. [Is your Personal Data sent to recipients located in other countries and why?](#)
7. [How long do we keep your Personal Data?](#)
8. [How do we secure your Personal Data?](#)
9. [What are your rights regarding Personal Data?](#)
10. [How do we process children's Personal Data?](#)
11. [How can you contact us or the relevant Supervisory Authority?](#)
12. [Changes to our Privacy Policy](#)

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

Personal Data is collected only for the purposes set out in Section 3 below and each time you 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 Winemakers Spain.

Subject to applicable law requirements, we may use a variety of technologies that collect and provide information about how our Digital Media is accessed and used by you. We may also use 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.

## 2. How and why do we use tracking technologies?

Pernod Ricard Winemakers Spain uses tracking technologies such as cookies, IP Addresses or Log files. Tracking technologies help us tailor our Digital Media to your personal needs.

- We use Cookies to better understand how visitors use our Digital Media and the tools and services offered, and improve their use and functionality. Subject to your consent where required by applicable law, our Digital Media use cookies and similar technologies (“cookies”). Cookies are small files that are placed on your device that serve a number of purposes 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 Site. You can learn more about the cookies we use and how you can disable cookies in the [Cookies 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 long), and, (iii) other similar navigational or click-stream data. We also use information captured in log file for our internal marketing and demographic studies, so we can constantly improve and customize the online services we provide you. Log files are used internally only, and are not associated with any particular user.

## 3. For what 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.);
- **When you purchase products on our websites:** we use your Personal Data to manage your order and deliver your products.
- **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 a check box or otherwise) 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 displayed on Pernod Ricard Winemakers Spain products: we use your Personal Data to send you more information on the products where the QR code or equivalent feature is displayed or other products;
- **Because it is also Pernod Ricard Winemakers Spain legitimate interest to better serve you:**
    - 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 registration).
    - We may use the combined above-mentioned information and/or demographic information for our internal marketing and demographic studies and to constantly improve, personalize, and customize the products and services we provide you to better meet your needs. Some of the tools we use may involve automated individual decision-making subject to applicable law.
    - 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 Personal Data is used to respond to your inquiry or comment.
    - We will ensure that your Personal Data remains accurate and up-to-date and avoid duplication in our database, by verifying each of your interactions with us and/or one of our affiliates to ensure your Personal Data is still accurate or needs to be completed or updated with the additional information you will have provided.
    - We may conduct profiling based on monitoring your browsing activities on our Digital Media to better understand your preferences and center of interests and adapt our marketing communications to your profile, unless you object in the conditions set forth in Article 9 of this Privacy Policy.

Pernod Ricard Winemakers Spain 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.

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. You are invited to express your point of view through the right of access described above. You can also object the result of the automated decision by sending an email to the contact details in Section 12 below.

#### **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, or the Digital Media services and special 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 Winemakers Spain 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 Winemakers Spain 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 Winemakers Spain may also share your Personal Data with third parties, but only in the following circumstances:

- For marketing purposes if you gave us your consent.
- For support purposes: We may use service providers, agents or contractors to provide support for the internal operations of our Digital Media and to assist us with administering them or the various functions, programs and promotions available on it. Any such third party shall at all times provide the same levels of security for your Personal Data as Pernod Ricard Winemakers Spain 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 Winemakers Spain or any affiliate of the Group Pernod Ricard;
- 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 Winemakers Spain as part of such promotion, we will let you know this at the time your Personal Data is collected;
- 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 or rights of Pernod Ricard Winemakers Spain, its customers, or the public;
- In the event of a merger or acquisition of all or part of Pernod Ricard Winemakers Spain by another company, or in the event that Pernod Ricard Winemakers Spain were to sell or dispose of all or a part of the Pernod Ricard Winemakers Spain business, the acquirer would have access to the information maintained by that Pernod Ricard Winemakers Spain business, which could include Personal Data, subject to applicable law. Similarly, Personal Data may be transferred as part of a corporate reorganization, insolvency proceeding, or other similar event, if permitted by and done in accordance with applicable law

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

Pernod Ricard Winemakers Spain is a global company and your Personal Data may be transferred across international borders. It may be transferred to countries that 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 Winemakers Spain 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 and rely on

standard contractual clauses as set out by the European Commission or on the Privacy Shield. 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 Winemakers Spain instructions and implements 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 procedure as necessary to comply with our legal and regulatory obligations, resolve disputes and enforce our agreements.

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

Once the account is canceled, we will store your data for a maximum period of 18 months, except in the event you have enjoyed any of our products and or services. In this case, we will keep your Personal Data for a maximum period of 5 years. In any case, if the law, public administrations or courts set a higher period than those indicated in this paragraph for the obligation of store of documentation where your Personal Data can be recorded, we will apply these retention periods.

In the event you stop using the services of Pernod Ricard Winemakers Spain or our "Digital Media", we may retain your Personal Data together with other recipients of your Personal Data, for a longer period as long as it is necessary to fulfill the purpose for which you authorize us to share your Personal Data with them, or for their own compliance, in accordance with the purposes established by the applicable law and in their Terms and Conditions.

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

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

## 9. What are your rights regarding your Personal Data?

- If your Personal Data has been processed on the basis of your consent, **you can withdraw your consent at any time.**
- You can request **to access** your Personal Data
- You can request **to rectify your Personal Data** if it is inaccurate, incomplete or out of date
- You can request the **erasure** of your Personal Data (i) if your Personal Data is no longer necessary for the purpose of the data processing, (ii) you have withdrawn your consent on the data processing based exclusively on such consent, (iii) you objected to the data processing, (iv) the Personal Data processing is unlawful, (v) the Personal Data must be erased to comply with a legal obligation applicable to Pernod Ricard Winemakers Spain. Pernod Ricard Winemakers Spain will take reasonable steps to inform the other entities of the Pernod Ricard group of such erasure.

- You can request **the restriction** of the processing (i) in the event the accuracy of your Personal Data is contested to allow Pernod Ricard Winemakers Spain to check such accuracy, (ii) if you wish to restrict your Personal Data rather than deleting it despite the fact that the processing is unlawful, (iii) if you wish Pernod Ricard Winemakers Spain to keep your Personal Data because you need it for your defense in the context of legal claims (iv) if you have objected to the processing but Pernod Ricard Winemakers Spain conducts verification to check whether it has legitimate grounds for such processing which may override your own rights (v) if the data processing is based on the legitimate interest of Pernod Ricard Winemakers Spain.
- You can request **the portability** of the Personal Data you provided to us, in particular if the Personal Data processing is based on your consent or the performance of a contract.
- You always have the option not to share any of your Personal Data with us. If you choose this option, you may be limited in the activities and features we can provide you.
- **You have the right to object to the processing of your Personal Data by us, including for marketing purpose based on profiling.**

According to the local law, You have also the right to give general or specific instructions on how your personal data processed under this Privacy Policy may be used after your death.

## 10. How we treat children's Personal Data?

Our Site is not intended for children under the legal drinking age (“Minor”), so we do not knowingly collect personal data from Minors. You must be at least eighteen years old to create an account and engage in activities and transactions on our Digital Media. If we are notified or learn that a Minor has submitted Personal Data to us through our Digital Media, we will delete such Personal Data.

## 11. How can you contact us or the relevant Supervisory Authority ?

If you have any questions, complaints, or comments regarding this Privacy Policy or our information collection practices, please contact us by writing to:

*Pernod Ricard Winemakers Spain, S.A.U.  
Paseo Mikeletegi 71, 2ª planta,  
20009 San Sebastián (Gipuzkoa)  
Spain*

or sending an email to: [protecciondedatos@pernod-ricard.com](mailto:protecciondedatos@pernod-ricard.com)

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

## 12. Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this web page.

This privacy policy was last updated in May 2018.