

# Privacy Statement

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Websites, mobile applications, and other platforms (the “Website”) that link to this Privacy Statement are operated by or on behalf of Pernod Ricard USA, LLC and/or one of its affiliates in the United States, including but not limited to the Pernod Ricard family of brands listed at <https://www.pernod-ricard-usa.com/our-brands> (“Pernod Ricard”, “we”, or “us”).

We respect your right to privacy when you use our Website, communicate with us electronically, and otherwise provide us with your Personal Information. We have developed this Privacy Statement to inform you how we handle the Personal Information you provide to us.

Please read this Privacy Statement carefully. If you do not agree with our policies and practices described herein, your choice is not to use our Website. By accessing the Website, you agree to this Privacy Statement. We may update this Privacy Statement from time to time by posting the revised Privacy Statement on our Website. Your continued use of the Website is deemed to be acceptance of any changes, so please check for updates periodically.

This Website is intended for users based in the United States. If you are a visitor based in the European Union, please visit <https://www.pernod-ricard.com/en/privacy-policy>.

If you have any questions, please contact us at [privacy.prusa@pernod-ricard.com](mailto:privacy.prusa@pernod-ricard.com)

## **1. What types of Personal Information do We collect and how do We collect it?**

This Privacy Statement explains our practices with regard to “Personal Information.” Personal Information, as used in this Privacy Statement, is any information that can be used to identify, locate or contact you. We may collect the following types of Personal Information:

Contact information that allows us to communicate with you, such as name, username, mailing address, telephone number, country of residence, email address or other identifiers.

Relationship information that helps us do business with you, such as your age, interests and other general background information, as well as your brand and marketing preferences.

Transaction information, including your purchase history and customer account information.

Usage data about how you use our websites and mobile applications and your general location when you do so, to give us a better idea of how you interact with our brands and content.

In many cases, we collect Personal Information directly from you. We may ask for your Personal Information when you interact with us, such as registering on our websites, following us on social media, signing up to receive marketing news and invites, or joining a wine club. We may also obtain additional information from third party data suppliers to enhance our files and help us better understand our consumers.

## **2. How do We use your Personal Information?**

We may use your Personal Information to:

Fulfill your orders for products, services, and related activities, such as to send you communications related to your order, respond to your inquiries, perform age verification, product and service delivery, customer service, account management, support and related training of Our personnel involved in such activities, and to provide other services related to your account;

Develop Our relationship with you such as by delivering personalized content;

Provide you with marketing communications and offers for products and services from us and, in some cases, our partners, including for offers targeted based on your interests or location;

Administer market research, surveys and promotional events that you may voluntarily choose to join;

Match it with other public and private data sources in order to enhance our records, such as appending additional information to your profile, or the records of our business partners. We also may work with other providers who also possess information about you in order to reach you through different methods and platforms, such as on a social media platform that you use;

Manage our everyday business needs, such as payment processing and financial account management, product development, contract management, website administration, forum management, fulfillment, analytics, security and fraud prevention, corporate governance, reporting and legal compliance.

If we intend to use your Personal Information in a manner materially different than as set out in this Privacy Statement, we will provide you with supplemental information on such other purpose either at the time of collection or prior to such use consistent with applicable privacy law.

### **3. When is your Personal Information disclosed to others?**

We understand that you may not want us to provide your Personal Information directly to third parties for their own marketing purposes without your consent. We limit our sharing of your Personal Information as follows:

**Affiliates:** We may share your Personal Information with, or otherwise make it available to, Our affiliates, who may only use your Personal Information in compliance with this Privacy Statement.

**Service Providers:** We may share your Personal Information with Our service providers, who are instructed to only use your Personal Information in accordance with Our instructions.

**Partners:** We may share your Personal Information with unaffiliated joint marketing partners, but only if you have given Us your consent.

**Business Transfers and Legal Purposes:** We may also disclose Personal Information where necessary to affect the sale or transfer of business assets, in connection with a bankruptcy proceeding, to enforce our rights, protect our property, or protect the rights, property or safety of others, or as needed support external auditing, compliance and corporate governance functions. We may also disclose Personal Information when required to do so by law, such as in response to a subpoena, including to law enforcement agencies, courts, or other governmental bodies.

Please note that we may also use and disclose information about you in a form that is not personally identifiable, such as in an aggregate or other form that no longer identifies you, as consistent with applicable data protection law.

## 4. Cookies and Similar Technologies

When you visit our websites, mobile applications, or other platforms, we may collect Personal Information by automated means, using technologies such as cookies, pixel tags, browser analysis tools, server logs and web beacons. For example:

### *Cookies*

When you visit our website, we may place cookies on your device. 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. They also help us provide you with a customized experience and enable us to detect certain kinds of fraud. In many cases, you can manage cookie preferences and disable the use of cookies through cookies preference tools on our websites or by adjusting the settings on your browser. All browsers are different, so visit the settings of your browser to learn about cookie preferences and other privacy settings that may be

available. Please note that certain features of our websites may not be available if certain cookies are disabled. You can find more information about cookies and how they work at <https://www.allaboutcookies.org>

### *Pixel Tags and Web Beacons*

Pixel tags and web beacons are tiny graphic images that may be placed on our websites or in our emails that allow us to determine whether you have performed a specific action. When you access these pages or open an email, the pixel tags and web beacons generate a notice of that action. These tools allow us to measure response to our communications and improve our web pages and promotions.

### *Types of Data We Collect Through Cookies and Similar Technologies*

We may automatically collect personal and other types of information from cookies and similar technologies. For example, we may collect information about the device you use to access our website, your operating system type, browser type, referring domain, and other system settings, as well as the language your system uses and the country, state, zip code and time zone where your device is located. Our server logs also record the Internet Protocol (IP) address of your device. We may also collect information about the websites you visit before and after our Website. In many cases, the information we collect using cookies and other tools is only used in an aggregated or non-identifiable way, without any reference to Personal Information. For example, we use information we collect about website users to optimize Our websites and to understand website traffic patterns. In some cases, consistent with this Privacy Statement, we may associate the information we collect using cookies and other technology with your Personal Information

### *Third Party Advertisers and Interest-Based Ads*

We may allow service providers and third parties to collect information about the users of our website. Such third parties may collect Personal Information about your online activity over time and across different websites, a practice also known as online behavioral advertising. We have relationships with Google and other third-party advertising companies to deliver interest-based advertisements to you based on your brand preferences, general demographics, online behavior and other similar information. These companies may also perform tracking and reporting functions for us on this website and other websites. These companies may place cookies on your device when you visit our website or other websites so that they can display targeted advertisements to you. These companies do not collect Personal Information in this process, and we do not give any Personal Information to them as part of this process. However, this Privacy Statement does not cover the collection methods or use of the information collected by these companies.

For more information about interest-based advertising, please visit the Digital Advertising Alliance (DAA) at [www.aboutads.info/consumers](http://www.aboutads.info/consumers). We comply with the Self-Regulatory Principles for Online Behavioral Advertising as administered by the DAA. To opt out of being targeted by some third party advertising companies, you may visit [www.aboutads.info/choices](http://www.aboutads.info/choices).

We may work with third parties that use algorithms to determine if you have interacted with Our services on multiple devices and to match such devices together. We may then display interest-based advertisements to you across your devices or otherwise use the combined data for purposes under this Privacy Statement. For example, if you exhibit certain behaviors on your desktop computer, We may serve interest-based advertisements to you on your smartphone based upon those behaviors if We have linked both of those devices to you. If you would like to opt-out of such cross device matching, please visit the Digital Advertising Alliance (DAA) at [www.aboutads.info/consumers](http://www.aboutads.info/consumers).

Our websites' cookie management tool is configured to honor opt-out preference signals sent by Global Privacy Control ("GPC") within your browser. Please note that due to technical limitations, the GPC signal may only be recognized within your current browser. For more information on GPC please visit <https://globalprivacycontrol.org>

## 5. Mobile Applications

We may offer mobile applications that allow you to interact with us and receive personalized content, interest-based ads and other information via your device. When you download our mobile applications, you may choose to allow us to obtain your location from your mobile device. We may use this information to customize our response to your requests. We may also offer automatic (or "push") notifications to those who opt in to receive such notifications from us through their device or app settings. You do not have to provide location information to us or enable push notifications to use any of our mobile applications. If you have questions about location and notification privacy, please check the settings of or contact your mobile service provider or the manufacturer of your device. We may also collect information from mobile applications in the same manner that we do from websites.

## 6. Your Choices

You can limit the collection of certain information and the communications we send to you. To opt out of receiving marketing emails, you may click the link labeled "unsubscribe" at the bottom of any of our marketing emails. Please note that even if you unsubscribe from marketing messages, we may still need to contact you with transactional information about your account such as order confirmations and shipping notices. You can also exercise certain choices with respect to interest-based ads as set forth above in the "Third Party Advertisers and Interest-Based Ads" section. You may request that we delete your Personal Information from our active records. We will make reasonable efforts to honor such requests, provided that, we may retain archived information and are unable to remove your Personal Information from the records of any third parties with whom the information has previously been shared in compliance with this Policy Statement. Please contact us at [prusa.privacy@pernod-ricard.com](mailto:prusa.privacy@pernod-ricard.com) with any such requests. Please also note that if you are a resident of certain states, you have certain rights with respect to your choices over our use of your Personal Information as further described below.

## 7. Access, Correction, and Other Requests



We respect your right to access and correct your Personal Information under applicable law. If you have an online account on our Website, you can log into your account at any time to access and update the information you have provided to us. If you need assistance accessing or updating your Personal Information, please contact us at [prusa.privacy@pernod-ricard.com](mailto:prusa.privacy@pernod-ricard.com).

For more information on your rights under certain U.S. State privacy laws, please read below.

## **8. Information Security and Retention**

We take all appropriate technical and organizational measures to protect the confidentiality and security of your Personal Information. We have implemented an information security program that contains administrative, technical and physical controls that are reasonably designed to safeguard your Personal Information. For example, we use industry-standard encryption technology to secure Personal Information consisting of credit card numbers and other payment information when processed for any transactions made on our Website, as well as employing firewalls, site monitoring and other software intended to detect and prevent malicious activity. We may retain your Personal Information for as long as your account is active, or as long as needed for the business purposes described in this Privacy Statement, in accordance with applicable legal standards. Please note that other recipients of your Personal Information who have been provided with such information in compliance with this Privacy Statement may retain your data for longer periods to fulfil the purpose for which your Personal Information was shared with them, or for their own compliance, dispute resolution, enforcement, or record management purposes.

## **9. Your Rights Under U.S. State Laws**

If you are a resident of certain states, you have certain rights under applicable state laws with respect to your Personal Information.

### 1. *Rights of California Residents*

If you are a resident of California, please continue reading below at Section 10 “Rights of California Residents”.

### 2. *Rights of Virginia, Colorado, Connecticut, Utah, Oregon and Texas Residents*

If you are a resident of Virginia, Colorado, Connecticut, Utah, Oregon and Texas you have certain rights with regard to your Personal Information under those state’s applicable consumer privacy laws. This section describes those rights, which include:

The right to confirm whether We process your Personal Information.

The right to access and delete certain Personal Information.

The right to data portability.

The right to opt-out of processing of your Personal Information for targeted advertising.

The right to correct inaccuracies in your Personal Information (while taking into account the Personal Information’s nature and purpose of processing).

The right to opt-out of certain profiling in furtherance of decisions that produce legal or other significant effects.

The right to appeal any decision we made relating to a request to exercise any of the rights described in this section.

To exercise this right, we request that you include your full name, reason for your appeal, and any additional information to consider.

Residents of these states who wish to exercise these laws may submit a request by emailing us at [privacy.prusa@pernod-ricard.com](mailto:privacy.prusa@pernod-ricard.com) or by completing a form online at <https://prusaccpa.zendesk.com/hc/en-us/requests/new>

### *3. Rights of Nevada Residents*

If you are a resident of Nevada, the Nevada Privacy of Information Collected on the Internet from Consumers Act (the “NPICICA”) provides you with a limited right to opt-out of certain Personal Information sales. Nevada residents who wish to exercise this right under NPICICA may submit a request by emailing Us at [prusa.privacy@pernod-ricard.com](mailto:prusa.privacy@pernod-ricard.com).

## **10. Rights of California Residents**

If you are a California resident, you have certain rights with regard to your Personal Information under the California Consumer Privacy Act of 2018, including the California Privacy Rights Act of 2020 and any regulations promulgated thereunder (the “CCPA”).

This section, which applies only to California residents, supplements the Privacy Statement and describes your rights under the CCPA, explains how you may exercise your rights, and provides an overview of the types of Personal Information we collect. If you have any questions about this section, please contact us at [prusa.privacy@pernod-ricard.com](mailto:prusa.privacy@pernod-ricard.com). or via the details listed under the Section titled “How to Contact Us” in the Privacy Statement.

### *Collection of Personal Information*

When California residents access the Pernod Ricard websites, mobile applications or platforms, purchase Pernod Ricard products, visit one of our physical locations, or participate in our marketing research, we may collect the following Personal Information

### *Types of Personal info we collect*

Identifiers, such as name, alias, date of birth, postal address, email address, phone number, IP address, and account name.

Characteristics of protected classifications under California or federal law, such as age or sex.

Email Address

Commercial and transaction information, such as products or services purchased, obtained or considered, other purchasing or consuming histories or tendencies.

Internet or other similar network activity, such as browsing history, interaction with websites, mobile applications, platforms and advertisements.

Audio, electronic, visual or similar information, such as images, audio recordings, and video.

Inferences drawn from any of the above, such as a consumer's characteristics or preferences.

### *Sources from which Personal Information is Collected*

Directly from you, such as when you voluntarily provide us with Personal Information when using our websites, mobile applications or other platforms and at in person events.

Indirectly from you, such as when internet or other similar network activity is collected automatically through the use of our websites, mobile applications, or other platforms

Other third party sources, such as advertising networks, data analytic providers, or data suppliers.

### *Purposes for which Personal Information is Processed*

Internal business purposes. Examples include: Providing you with administrative communications. Matching Personal Information with other sources to enhance our records and better understand our consumers. Account management, product development, contract management, website or mobile application administration, corporate governance, reporting and legal compliance. Performing website analytics to evaluate performance.

Processing transactions. Examples include: Fulfilling orders for products or services or reserving brand home visits. Providing customer service and responding to customer inquiries. Sending transactional communications related to orders and reservations. Performing age verification related to orders. Managing customer accounts.

Advertising & marketing. Examples include: Delivering personalized content. Providing marketing communications and offers for products or services, in some cases from our partners. Administering voluntary market research, surveys, and promotions. Data analytics, counting ad impressions, and auditing compliance with specifications and other standards.

Security & fraud prevention. Examples include: Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and identifying individuals responsible for such activity.

### *Categories of Third Parties with which we disclose, share, and sell Personal Information*

We may disclose Personal Information to the following categories of third party for the above business purposes.

Service Providers, with whom we have entered into agreements with to perform services with on our behalf, such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, and payment processing.

Affiliates, such as those within the Pernod Ricard family of brands.

Public or governmental authorities, such as law enforcement or regulatory agencies where required by law.

In addition, we may share (for cross-context behavioral advertising) or sell Personal Information to the following categories of third parties. Please note that the terms “share” and “sell” used here are as defined under the CCPA. We do not exchange your Personal Information for monetary compensation.

Advertising networks, such as platforms to place our advertisements.

Data analytic providers, such as companies that provide reporting and insights on the use of our websites and services.

### *Summary of Personal Information Processing and Disclosure*

In the past 12 months, we have collected some or all of the categories of Personal Information described in the table below, which describes the business or commercial purposes for which the Personal Information was collected and the categories of third party entities with which such information has been disclosed to, shared with (for cross-context behavioral advertising), or sold to (as defined by CCPA) within the last 12 months. In addition, the categories of Personal Information described below may have been disclosed to public or governmental authorities where required by law.

<b>Categories of Personal Information</b>	<b>Purposes of processing</b>	<b>Disclosed for business purposes</b>	<b>Shared with or sold to</b>
Identifiers, such as name, alias, date of birth, postal address, email address,	Internal business purposes	Affiliates Partners Service providers	Advertising networks Data analytics

Categories of Personal Information	Purposes of processing	Disclosed for business purposes	Shared with or sold to
IP address, and account name.	Processing transactions Advertising & marketing Security & fraud prevention		providers
Characteristics of protected classifications under CA or federal law, such as age and sex	Internal business purposes Processing transactions Advertising & marketing	Affiliates Partners Service providers	Advertising networks Data analytics providers
Commercial and transaction information, such as products or services purchased, obtained or considered or consuming	Internal business purposes Processing transactions Advertising & marketing	Affiliates Partners Service providers	Advertising networks Data analytics providers

Categories of Personal Information	Purposes of processing	Disclosed for business purposes	Shared with or sold to
histories or tendencies.	Security & fraud prevention		
Internet or other electronic network activity information, such as browsing and search history and interaction with websites, mobile applications, platforms and advertisements.	Internal business purposes Advertising & marketing Security & fraud prevention	Affiliates Partners Service providers	Advertising networks Data analytics providers
Geolocation data, such as location generally derived from IP address location services.	Internal business purposes Advertising & marketing Security & fraud prevention	Affiliates Partners Service providers	Advertising networks Data analytics providers



<b>Categories of Personal Information</b>	<b>Purposes of processing</b>	<b>Disclosed for business purposes</b>	<b>Shared with or sold to</b>
Audio, electronic, visual, or similar information, such as images, audio recordings, and video.	Internal business purposes Advertising & marketing	Affiliates Partners Service providers	N/A
Inferences drawn from any of the above, such as characteristics or preferences.	Internal business purposes Advertising & marketing	Affiliates Partners Service providers	Advertising networks Data analytics providers

### *Individual Rights for California Residents*

As a California resident, you have the following rights under CCPA:

Right to Know. You have the right to request that we disclose certain information to you about our collection, use, disclosure, or sale of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, and subject to certain limitations that we describe below, we will disclose such information. You have the right to request any or all of the following: The categories of Personal Information that we

have collected about you. The categories of sources from which such Personal Information is collected. Our business or commercial purpose for collection, use, or disclosure of such Personal Information. The categories of third parties with whom we sell or share such Personal Information.

**Right to Delete.** You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records unless an exception applies. For example, we may deny your deletion request if retention of the Personal Information is: Necessary to detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity; or prosecute those responsible such activities; For solely internal purposes reasonably aligned with your expectations based on your relationship with us; Necessary to comply with a legal obligations; or Otherwise necessary for internal use consistent with the context in which you provided the Personal Information.

**Right to Correct Inaccuracies.** You have the right to request the correction of any Personal Information we maintain about you.

**Right to Opt Out of the Sale or Sharing of Personal Information.** You have the right to opt out of the sale or certain sharing of your Personal Information. You can make such a request through the “Do Not Sell or Share My Personal Information” link at the bottom of our Website where applicable, by using the Global Privacy Control (GPC), or by submitting a request to us at the contact information listed below. We do not sell or share the Personal Information of minors under 16 years of age; our Website is not intended for those under the legal age to purchase alcohol beverage products.

**Right to Nondiscrimination.** You have the right to not receive discriminatory treatment for exercising your CCPA rights. If you choose to exercise any of your CCPA rights with Pernod Ricard, we will not deny you goods or services, charge you with different prices or rates for goods or services (including through discounts, benefits, or imposition of penalties), or provide you with a different level of service than you would receive if you chose not to exercise such rights.

## *Exercising your CCPA Rights*

You can submit your request to exercise your CCPA rights through any of the following methods:

By email, at [privacy.prusa@pernod-ricard.com](mailto:privacy.prusa@pernod-ricard.com);

By calling our toll-free phone number, at (855) 652-0855

By submitting a request form online, at <https://prusaccpa.zendesk.com/hc/en-us/requests/new>.

After submitting a request, we will take steps to verify your identity in order for us to properly respond and/or confirm that it is not a fraudulent request. In order to verify your identity, we will request, at a minimum, that you provide your name, email address, phone number, address, and relationship to us, so that we can seek to match this information with the information existing in our systems. When providing us this information, you represent and affirm that all information provided is true and accurate. If we are unable to verify that the consumer submitting the request is the same individual about whom we have collected personal information, we may contact you for more information, or we may not be able to meet your request. Only you, or an agent legally authorized to act on your behalf, may make a verifiable request related to your Personal Information. If you are making a request as the authorized agent of a California consumer, we will ask you also submit reliable proof that you have been authorized in writing by the consumer to act on such consumer's behalf. We will make every effort to respond to your request within 45 days from when you contacted us. If you have a complex request, the CCPA allows us up to 90 days to respond. We may contact you within 45 days from the date you contacted us to inform you if we need more time to respond.

## *Other California Resident Privacy Rights*

Under California Civil Code Section 1798.83 (the “California Shine the Light Law”), California residents that we have an established business relationship with are entitled to request and receive, free of charge and once per calendar year, information about certain Personal Information we have shared, if any, with other businesses for their own direct marketing uses in the previous calendar year. To make a request under the California Shine the Light Law, please contact us at [privacy.prusa@pernod-ricard.com](mailto:privacy.prusa@pernod-ricard.com).

Please note that not all Personal Information sharing may be covered under the California Shine the Light Law and only covered Personal Information sharing will be included in our response.

## **11. Personal Information of People Under the Legal Purchase Age**

Our websites, mobile applications, and other platforms are intended only for adults who are of the legal age to purchase alcohol beverage products. We do not intend to collect Personal Information from any individuals under the legal purchase age or to market alcoholic beverages to anyone under the legal purchase age. Please do not provide us with your Personal Information if you are not of legal age to purchase alcohol in the jurisdiction in which you reside and (if different) in the jurisdiction in which you are interacting with us. If we receive notice or believe that someone under the legal purchase age has provided us with Personal Information, we will use reasonable efforts to remove such Personal Information from our files, or to flag such Personal Information and (to the extent permitted by law) retain it for the sole purpose of ensuring that it is no longer used.

## **12. Privacy Policies of Third Parties**

This Privacy Statement only addresses the use and disclosure of information by Pernod Ricard. Third party websites or platforms that may be accessible through our websites or platforms have their own privacy policies and data collection, use and disclosure practices. We encourage you to familiarize yourself with the privacy policies of those third parties before interacting with them and providing them with your information or taking part of any third party offer or

promotion. If you interact with Us on social media platforms, those interactions are governed by the terms of use and privacy policies of the social media platform providers.

## **13. Website Public Areas**

Our websites may provide public areas where you can publicly post information, such as reviews and comments. Prior to posting in these areas, please carefully read our Website Terms of Use, available at <https://www.pernod-ricard-usa.com/terms-of-service>. All information you post in these public areas can be seen by anyone with Internet access, and any Personal Information you include in your posting may be read, collected, and used by others. For example, if you publicly post your email address, you may receive unsolicited messages from others. Please use caution accordingly before posting any Personal Information in these public areas

## **14. How to Contact Us**

Please contact us if you have any questions at [privacy.prusa@pernod-ricard.com](mailto:privacy.prusa@pernod-ricard.com).