

Pernod Ricard Online Privacy Policy

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Introduction

Pernod Ricard respects your right to privacy when you use our digital media (such as our websites, our mobile applications, our social media pages, and any online registration forms for our events and newsletters – together the “**Digital Media**”) and communicate electronically with us.

This privacy policy (the “**Privacy Policy**”) applies to the following persons (“**you**”):

- All users of our Digital Media;
- The clients of our Digital Media;
- The participants to our events, sweepstakes and/or contests;
- The participants to our surveys;
- The recipients of our marketing messages/advertising.

The purpose of this Privacy Policy is to inform you how Pernod Ricard Gulf collects, stores and uses the personal data collected from you.

This Privacy Policy may be updated at any time as a result of, among others, legal, technical or commercial changes. We will notify you, by appropriate mean, of any substantive change in this Privacy Policy. You are also invited to regularly read this Privacy Policy to make sure you are aware of the latest version.

1. WHO IS THE DATA CONTROLLER FOR THE PROCESSING OF YOUR PERSONAL DATA?

Pernod Ricard Gulf , a corporation duly organized under the laws of United Arab Emirates, with its registered address at (“**Pernod Ricard**” or “**we**”, “**our**”, “**us**”) acts as the “data controller” for the processing of your personal data (i.e. it is the entity that determines “why” and “how” your personal data are used).

Please note that Pernod Ricard Gulf markets products and services and will process the personal data you provide when interacting with any of these brands.

2. WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU AND HOW?

“Personal data” refers to any information that may identify you directly (e.g., your name) or indirectly (e.g., your phone number, postal/email address, pseudonymized data such as a unique identifier).

We collect most of the personal data directly from you, for example by filling out a contact form, creating an account, using interactive features, subscribing to a service, registering and attending to an event, joining a loyalty program, attending any of our experiences, courses and testing, participating in a marketing campaign, entering a contest, ordering a product or service, requesting information, or responding to surveys.

We may also collect personal data from cookies on our Website

Depending on the purposes of collection, personal data collected are the following:

- your name, your gender and contact details, including your postal address, email address, and phone numbers, and, where applicable, your business contact details; information allowing us to verify and check your identity, such as your date of birth;
- your billing and delivery information, transaction and payment card information;
- location data;
- information to enable us to undertake financial checks on you to the extent permitted by applicable law;
- your professional online presence, e.g. LinkedIn profile;
- information from accounts you link to us, e.g. social media;
- your contact history, purchase history, and saved items;
- your interests, tastes and preferences;
- information on how you use our Digital Media;
- your responses to surveys and promotions;
- your IP address and your mobile/tablet/device identifier;
- customer service information (e.g., customer service inquiries, comments);
- content you may provide to us (e.g., images, comments, audio recordings, etc.).

The personal data collected is necessary to achieve the purposes described in section 3 below. If you do not provide the personal data we request, it may delay or prevent us from providing you with products or services.

3. FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS ARE PERSONAL DATA PROCESSED?

Pernod Ricard collects and processes personal data that are relevant, adequate, not excessive and strictly necessary for the purposes pursued.

You will find below a table listing:

- The different purposes of the processing operations (i.e. why we use your personal data);
- The legal basis on which we rely to carry out the processing (i.e. why we are authorized to use your personal data).

PURPOSE OF THE PROCESSING	LEGAL BASIS
Restrict access to our Digital Media to comply with applicable law or contractual restrictions	Pernod Ricard's compliance with its legal obligations
Manage the creation of an account and your registration to the services/features available on our Digital Media including events and contests and provide you with the relevant services/features you have subscribed	Performance of a contract (e.g. our Terms & Conditions) between Pernod Ricard and you (including the execution of pre-contractual measures) to provide you with the requested service.
Provide you with marketing information, about the various brands we sell, (i) by electronic communications, phone and (ii) by displaying advertisements for you and people with a similar profile to you, on Pernod Ricard Digital Media and/or any digital advertising platforms such as social media platforms.	Your consent .

<p>⇒ <i>For example: we may send you emails with announcements about a new service or product we offer. We may also display advertising during your browsing on a social media platform about a promotion regarding the products of one of our brands.</i></p> <p><i>Please note that, in order to display advertisements likely to be of interest to you, we will share your identification data (such as your surname, first name, contact details) to the relevant digital advertising platforms (such as social media). Once your data is shared on such platforms, it is used to enable them to find you among their users, and (i) to show you ads about our products and services relating to brands operated by us when you browse such platforms, and (ii) to identify, based on your profile on the relevant platforms, lookalikes who may also be interested by Pernod Ricard’s ads.</i></p> <p><i>In the context of these activities, we do not however, collect or access at any time the personal data concerning you held by the digital advertising platforms concerned and relating in particular to your profile or your behavior on such platforms.</i></p>	
<p>Improve our customer knowledge / enrich your profile</p> <p>Allow us to learn more about your tastes and preferences through agreed interactions with you and more generally log our interactions with you as it is our legitimate interest to learn more about your tastes, your expectations, understanding how you use our services to provide a more customized service and improve our offers to you. This would also allow us to send you marketing communications better tailored to your interests and thus more relevant.</p> <p>We will occasionally combine, update, or otherwise enhance the personal data collected through our Digital Media with data we receive from outside records or third parties.</p> <p>⇒ <i>For example: we may use the data from your purchase history to send you an invite to a local event related to a product you have purchased.</i></p>	<p>Pernod Ricard’s legitimate interest, more specifically its economic/business interest to better serve your needs.</p>
<p>Manage joint and co-sponsored programs and promotions</p> <p>⇒ <i>For example: When we run a joint or co-sponsored program or promotion on our Digital Media with another company, organization, or other reputable third party, we may share your personal data with our partner or sponsor.</i></p>	<p>Your consent</p>

<p>When you use the third-party sponsorship (“Send to a friend”) feature. The Personal Data collected is used only once to send the communication and is not further retained by us, as appropriate according to local law.</p>	<p>Your consent or the legitimate interest when permitted by law</p>
<p>Measure the performance of our business (including our marketing campaigns) and analyze of such performance to improve it</p>	<p>Pernod Ricard’s legitimate interest, more specifically its economic/business interest in optimizing its activities and its marketing campaigns to improve the user experience and boost sales.</p>
<p>Ensure the proper functioning of our Digital Media (for example via audience measurement and statistics) through trackers such as cookies strictly necessary for the provision of an online communication service expressly requested by the user or solely intended to enable or facilitate communication by electronic means (for more information you can refer to our Cookie Policy.)</p> <p>⇒ <i>For example: for user interface customization trackers (for example, for language selection or the presentation of a service), when such customization is an expected element of the service; for trackers enabling load balancing of equipment contributing to a communication service.</i></p>	<p>Pernod Ricard’s legitimate interest to ensure the proper functioning of its Digital Media.</p> <p>Your consent, when necessary</p>
<p>Optimize your user experience, provide you with advertising and content adapted to your interests through the setting of cookies on our Digital Media – for more information you can refer to our Cookie Policy.</p>	<p>Your consent</p>
<p>Handle any request or feedback you make about our products and/or services (complaints, comments, satisfaction survey, etc.)</p> <p>⇒ <i>For example: management of your inquiries sent via our contact forms or contact email addresses, management of feedback provided in a satisfaction survey</i></p>	<p>Depending on the purpose of your request, the legal basis is either:</p> <ul style="list-style-type: none"> - <u>If your request is not related to a product/service already purchased from/subscribed with Pernod Ricard:</u> Pernod Ricard's legitimate interest, more specifically its economic/business interest to serve your needs and allow you to communicate with us simply and efficiently; - <u>If your request is related to a product/service already purchased from/subscribed with Pernod Ricard:</u> the performance of a contract (e.g.

	our Terms & Conditions) between Pernod Ricard and you.
Organize polls and surveys to get your feedback regarding our products and services	Your consent
Maintain the safety and security of our Digital Media and ensure fight against the fraudulent use of our websites or services	Pernod Ricard's legitimate interest , more specifically its business and economic interest to provide you with secure Digital Media and services.
<p>Send you transactional, legal or administrative communications</p> <p>⇒ <i>For example: we may send you confirmation email when you sign up for, or unsubscribe from, a specific service or feature; we may also send you notices about updates to our privacy notices</i></p>	<p>Performance of a contract (e.g. our Terms & Conditions) between Pernod Ricard and you (including the execution of pre-contractual measures) to provide you with the requested service.</p> <p>For legal communications: Pernod Ricard's compliance with its legal obligations.</p>
<p>Establish any evidence necessary to defend our rights and manage pre-litigation and litigation proceedings</p> <p>Respond to requests from the relevant authorities and defend our rights based on our legal obligations.</p> <p>⇒ <i>For example: If we receive a subpoena or another legal request, we may need to inspect the data we hold to determine how to respond</i></p>	Pernod Ricard's legitimate interest to defend its rights
Manage a merger or acquisition of all or part of Pernod Ricard or a corporate reorganization	Pernod Ricard's legitimate interest i.e. its economic/business interest to anticipate and perform a corporate operation.
<p>Handle data subjects' rights</p> <p>⇒ <i>For example: management of your request to delete to your personal data</i></p>	Pernod Ricard's compliance with its legal obligations.
Manage your order, the delivery of products purchased on our Digital Media as well as manage product returns and after-sales services	Performance of a contract (e.g. our Terms & Conditions) between Pernod Ricard and you (including the execution of pre-contractual measures) to provide you with the requested service.

<p>Accounting management</p>	<p>Pernod Ricard's compliance with its legal obligations.</p>
<p>Secure the payment of your purchases on our Digital Media (and detect fraudulent payments)</p> <p><i>In this context, Pernod Ricard may process Personal Data involving automated decision making, where necessary for the performance of a contract (e.g. avoid fraudulent payment). It is specified that payment information (credit card number/details/banking information) is not collected by us but directly by the payment service providers. Due to automatic fraud detection, (i) the processing of your order/request may be delayed while we review your transaction; and (ii) you may be excluded from the benefit of a service or access to the service may be limited if a fraud risk is detected.</i></p>	<p>Pernod Ricard's legitimate interest, more specifically its business/economic interest to provide you with secure payments.</p>

4. TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA AND WHY?

- **To internal authorised employees**

We will communicate your data to **our employees** who need to process your personal data for the purposes specified in Section 3 of this Privacy Policy, in particular to our digital marketing, sales, accounting and tech teams. Your personal data can also be processed by employees from Pernod Ricard Group's affiliates worldwide, where Pernod Ricard affiliates provide support services (IT, administrative, marketing support) as processor of Pernod Ricard Gulf.

- **To service providers**

- **For marketing and communication purposes, including competitions and events:** we will share your data with our marketing and communication service providers such as advertising agencies, marketing agencies, social media and digital agencies to help us carry out competitions and events, advertising, marketing and sales campaigns, as well as analyzing their effectiveness and manage your contacts and queries.
- **For IT support purposes:** we will share your data with our IT support service providers (for hosting, maintenance and technical support services) to help us for the internal operations of our Digital Media and to assist us with administering them or the various features, programs and promotions available on it.
- **For management of orders, payments, deliveries and after sales purposes:** we will share your data with our IT support services providers, customer support, logistical and transport services and payment services providers.

- **To partners**

- For joint and co-sponsored programs or promotion: when we run a joint or co-sponsored program or promotion on our Digital Media with another company, organization, or other reputable third party, we may share your personal data with **our partner or sponsor**. If your personal data is shared with a company other than Pernod Ricard as part of such program/promotion, we will let you know this at the time your personal data is collected.
- For targeted advertising purposes: as indicated above, we will share, with your consent, your personal data with some **digital advertising platforms** to display targeted ads on them, about the products and services of our various brands, to you and people with a similar profile to you. For more information about how such social media process your personal data and on how to exercise your rights with them in connection with any further processing of your personal data, we invite you to view their privacy policy on their website.

- **To other third parties**

- **For litigation and safety purposes:** we may also disclose your personal data to **authorities and/or external counsels** 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 security or rights of Pernod Ricard, its 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 were to sell or dispose of all or a part of the Pernod Ricard business, the **acquirer** may have access to the information maintained by that Pernod Ricard 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. If applicable, the acquirer who will act as the new data controller will process your personal data in the conditions provided in the acquirer's privacy policy.

5. IS YOUR PERSONAL DATA SENT TO RECIPIENTS OUTSIDE THE UAE?

Pernod Ricard is a global company and your personal data may be transferred to countries outside the UAE, where [Pernod Ricard Affiliates](#) and third parties operate, such transfers will take place only if permitted and carried out in compliance with applicable laws. For these transfers, Pernod Ricard takes the appropriate measures to maintain security of the personal data both during transit and at the receiving location and ensure that countries have been deemed as providing an adequate level of protection by the EU laws including the European Commission, or that third parties implement relevant safeguards provided by applicable laws i.e. the Standard Contractual Clauses as set out by the European Commission or, where applicable, Binding Corporate Rules. You may obtain a copy of these safeguards at any time: to do so, please contact Pernod Ricard at the email address specified in section 10 of this Privacy Policy.

6. 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, or else to 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.

7. HOW DO WE SECURE YOUR PERSONAL DATA?

Pernod Ricard takes all necessary technical and organizational measures to protect the confidentiality and security of your personal data collected via our Digital Media. These efforts include but are not necessarily limited to: (i) storing your personal data in secure operating environments to which the public does not have access, but only authorized Pernod Ricard 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.

Our Digital Media may link up users to other websites of third parties and/or affiliates or subsidiaries of Pernod Ricard, through hyperlinks; this is a service available to you as a user of the site. Such links do not constitute an endorsement by Pernod Ricard of the linked sites, their content, including

products, advertising or any other materials featured on them. Pernod Ricard has no control over these linked sites and cannot be held responsible or liable for their content, including products, advertising or any other materials featured on them, or any purchase you may choose to make on these linked sites.

8. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?

You have the following rights with respect to your personal data:

- If your personal data has been processed on the basis of your consent, you can **withdraw your consent at any time** (see the table in section 3 of this Privacy Policy to understand which processing are based on your consent).
- You have the **right to obtain a copy of** the personal data we hold about you.
- You can request **to rectify your personal data** if they are 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 purposes mentioned above in section 3, (ii) if you have withdrawn your consent for a data processing based exclusively on such consent, (iii) if you have objected to the data processing, (iv) if the personal data processing is unlawful, (v) if the personal data must be erased to comply with a legal obligation applicable to Pernod Ricard. Please note however that this is not an absolute right, as we may be obliged to retain your personal data for legal or legitimate reasons.
- You can request **the restriction of the processing**. You may ask us to restrict the processing of your personal data in specific cases (e.g., if you contest the accuracy of your personal data).
- You have the **right to data portability**, meaning to receive (and transmit to another data controller) personal data that you have provided to us and that we hold about you in a structured, commonly used and machine-readable format. This applies only where the processing is based on your consent or the execution of pre-contractual measures / performance of a contract and is carried out by automated means (see the table in section 3 of this Policy to understand which processing rely on these legal basis).
- **You have the right to object to the processing of your Personal Data by us, at any time, (i) for direct marketing purpose including based on profiling, or (ii) if the data processing is based on the legitimate interest of Pernod Ricard, except if we can demonstrate compelling legitimate grounds for the processing - (see the table in section 3 of this Privacy Policy to understand which processing are based on Pernod Ricard's legitimate interests).**

To exercise all these rights, you can send a request to: dpo@difc.ae

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. In United Arab Emirates, you can contact the Data protection laws via their website at: <https://u.ae/en/about-the-uae/digital-uae/data/data-protection-laws>

However, we invite you to contact Pernod Ricard at the address below before filing any complaint before any supervisory authority.

9. HOW DO WE TREAT CHILDREN'S PERSONAL DATA?

Our Digital Media are not intended for children under the legal drinking age ("Minor"), we have implemented an age gate so we do not knowingly collect personal data from Minors. 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.

10. HOW CAN YOU CONTACT US?

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 GULF FZE PO Box 17497, Dubai, United Arab Emirates

Pernod Ricard as appointed a Global Data Protection Officer that you can reach at group.dpo@pernod-ricard.com.