

# Pernod Ricard Online Privacy Policy

Pernod Ricard Asia Duty Free Limited, in its role as Data Controller, takes your privacy very seriously and respects your right to privacy when you use our digital media (such as our websites, our mobile applications, our pages on the social network, and any online registration forms and whenever else you communicate electronically with us ("Digital Media").

Please read this Privacy Policy carefully as it contains important information on who we are and how and why we collect, store, use and share your Personal Data. It also explains your rights in relation to your Personal Data and how to contact us or supervisory authorities in the event you have a complaint.

Pernod Ricard Hong Kong and Macau, a division of Pernod Ricard Asia Duty Free Limited, a corporation duly organized under the laws of Hong Kong, with its registered address at 25/F, Tower 5, The Gateway, 15 Canton Road, Harbour City, Tsimshatsui, Kowloon, Hong Kong ("Pernod Ricard", "we", "us" or "our"). We are the data controller when processing your Personal Data in the conditions described in this Privacy Policy, which includes any Personal Data you submit to this website or another website that links you to this Privacy Policy, such as a microsite that we use to run a promotion or competition (the "Website").

Please note that Pernod Ricard Asia Duty Free Limited markets products and services under various [brands](#) and will process the personal data you provide when interacting with any of these brands.

## Topics

1. **What Personal Data do we gather about you?**
2. **How do we use your Personal Data for direct marketing?**
3. **For what purposes and on what legal basis are Personal Data processed?**
4. **How is your Personal Data collected?**
5. **How and why do we use tracking technologies?**
6. **What happens if you do not wish to provide your Personal Data?**
7. **To whom do we disclose Your Personal Data and why?**
8. **Is your Personal Data sent to recipients located in other countries and why?**
9. **How long do we keep your Personal Data?**
10. **How do we secure your Personal Data?**
11. **What are your rights regarding Personal Data?**
12. **How do we process children's Personal Data?**
13. **Do we link to other third-party websites?**
14. **How can you contact us?**
15. **Changes to our Privacy Policy**

# Pernod Ricard Online Privacy Policy

## 1. What Personal Data do we gather about you?

Personal Data means any information that can be used to personally identify you or contact you online or elsewhere, which may be collected when you use our Digital Media.

We may collect and use the following Personal Data about you:

- your name and contact information, including postal address, email address and telephone numbers and, if applicable, company details
- information to enable us to check and verify your identity, e.g. your date of birth
- your gender information, if you choose to give this to us
- location data
- your billing information, transaction and payment card information
- information to enable us to undertake credit or other financial checks on you to the extent permitted by applicable law
- your personal or professional interests, household, lifestyle, habits and preferences
- your professional online presence, e.g. LinkedIn profile
- your contact history, purchase history and saved items
- information from accounts you link to us, e.g. Facebook
- information about how you use our Website, IT, communication and other systems
- your responses to surveys, competitions and promotions
- your IP address and your mobile/tablet/device ID

Personal Data is collected only for the purposes set out in Section 2 and 3 below and each time you participate in any of the features or services offered by our Digital Media. This Personal Data is required to provide products and Digital Media to you. If you do not provide Personal Data we ask for, it may delay or prevent us from providing products or services to you.

## 2. How do we use your Personal Data for direct marketing?

Subject to your consent (which includes an indication of no objection), we may use and share your name, contact details, profile information (including place of residence, location based on IP address and transaction data) with other entities (see Section 7 for details) for direct marketing purposes. Specifically:

- We may provide you with marketing information by electronic communications, such as newsletters, phone calls, or equivalent feature displayed on our products. Additionally, we may display advertisements tailored to you and individuals with similar profiles on Digital Media and/or any digital advertising platforms, including social media platforms about the various brands we sell.
- 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

## Pernod Ricard Online Privacy Policy

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 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.

From time to time, you may decide to “opt in” to, or to “opt out” from, use by us of your Personal Data for promotional and marketing purposes. Every time you receive marketing information from us, you will be given the option to opt out by following the instructions provided therein. You can also contact us at any time to cease the use and sharing of your personal information for direct marketing purposes by email to the contact details provided in Section 14 below.

### 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
<b>Restrict access to our Digital Media</b> to comply with applicable law or contractual restrictions.	Pernod Ricard’s compliance with its <b>legal obligations</b> .
Manage <b>the creation of an account</b> and your <b>registration to the services/features available on our Digital Media</b> including events and contests and provide you with the relevant services/features you have subscribed.	<b>Performance of a contract</b> (e.g. our Terms & Conditions) <b>between Pernod Ricard and you</b> (including the execution of pre-contractual measures) to provide you with the requested service.
<b>Provide you with marketing information</b> , about the various brands we sell, <b>(i) by electronic</b>	Your <b>consent</b> .

## Pernod Ricard Online Privacy Policy

**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.

⇒ *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.*

*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.*

*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.*

### **Improve our customer knowledge / enrich your profile**

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**

**Pernod Ricard's legitimate interest**, more specifically its economic/business interest to better serve your needs.

## Pernod Ricard Online Privacy Policy

<p><b>marketing communications better tailored to your interests and thus more relevant.</b></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><b>Manage joint and co-sponsored programs and promotions.</b></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><b>Your consent.</b></p>
<p><b>When you use the third-party sponsorship (“Send to a friend”) feature.</b> 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><b>Your consent or the legitimate interest when permitted by law.</b></p>
<p><b>Measure the performance of our business (including our marketing campaigns) and analyze of such performance to improve it.</b></p>	<p><b>Pernod Ricard’s legitimate interest</b>, more specifically its economic/business interest in optimizing its activities and its marketing campaigns to improve the user experience and boost sales.</p>
<p><b>Ensure the proper functioning of our Digital Media (for example via audience measurement and statistics) through trackers such as cookies</b> 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 (see for more details our Cookie Policy available in the footer of each of our Website)</p>	<p><b>Pernod Ricard’s legitimate interest</b> to ensure the proper functioning of its Digital Media.</p> <p><b>Your consent</b>, when necessary.</p>

## Pernod Ricard Online Privacy Policy

<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><b>Optimize your user experience, provide you with advertising and content adapted to your interests</b> through the setting of cookies on our Digital Media – see for more details our Cookie Policy available in the footer of each of our Website.</p>	<p><b>Your consent.</b></p>
<p><b>Handle any request or feedback you make about our products and/or services (complaints, comments, satisfaction survey, etc.)</b></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"> <li>- <u>If your request is not related to a product/service already purchased from/subscribed with Pernod Ricard:</u> <b>Pernod Ricard's legitimate interest</b>, more specifically its economic/business interest to serve your needs and allow you to communicate with us simply and efficiently;</li> <li>- <u>If your request is related to a product/service already purchased from/subscribed with Pernod Ricard:</u> the <b>performance of a contract</b> (e.g. our Terms &amp; Conditions) <b>between Pernod Ricard and you.</b></li> </ul>
<p><b>Organize polls and surveys to get your feedback regarding our products and services.</b></p>	<p><b>Your consent.</b></p>
<p><b>Maintain the safety and security of our Digital Media and ensure fight against the fraudulent use of our websites or services.</b></p>	<p><b>Pernod Ricard's legitimate interest</b>, more specifically its business and economic interest to provide you with secure Digital Media and services.</p>

## Pernod Ricard Online Privacy Policy

<p><b>Send you transactional, legal or administrative communications</b></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><b>Performance of a contract</b> (e.g. our Terms &amp; Conditions) <b>between Pernod Ricard and you</b> (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 <b>legal obligations</b>.</p>
<p><b>Establish any evidence necessary to defend our rights</b> and manage pre-litigation and litigation proceedings</p> <p><b>Respond to requests from the relevant authorities</b> 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>	<p><b>Pernod Ricard's legitimate interest</b> to defend its rights.</p>
<p>Manage a <b>merger or acquisition</b> of all or part of Pernod Ricard or a <b>corporate reorganization</b>.</p>	<p><b>Pernod Ricard's legitimate interest</b> i.e. its economic/business interest to anticipate and perform a corporate operation.</p>
<p><b>Handle data subjects' rights</b></p> <p>⇒ <i>For example: management of your request to delete to your personal data</i></p>	<p>Pernod Ricard's compliance with its <b>legal obligations</b>.</p>
<p><b>Manage your order, the delivery of products</b> purchased on our Digital Media as well as <b>manage product returns and after-sales services</b>.</p>	<p><b>Performance of a contract</b> (e.g. our Terms &amp; Conditions) <b>between Pernod Ricard and you</b> (including the execution of pre-contractual measures) to provide you with the requested service.</p>

## Pernod Ricard Online Privacy Policy

<b>Accounting management</b>	Pernod Ricard's compliance with its <b>legal obligations</b> .
<b>Secure the payment of your purchases on our Digital Media (and detect fraudulent payments)</b>  <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.</i> <i>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>	<b>Pernod Ricard's legitimate interest</b> , more specifically its business/economic interest to provide you with secure payments.

#### 4. How is your Personal Data collected?

Personal Data we collect from you:

We collect most of this Personal Data directly from you—in person, by telephone, text or email and/or via our Website and apps. This usually occurs when you take part in one of our promotional activities or subscribe to one of our Digital Media, for example:

- Registration or sign-up online: e.g. mobile app, Websites, social media or subscribing to a newsletter specific to our Digital Media or creating an account to be a member of a club;
- 'Send to a friend' marketing communications;
- Sweepstake, lucky draws and contest;
- Joining a loyalty program or subscribing to a newsletter;
- Buying products or services online;
- When doing e-commerce on certain of our Websites;
- Using a QR Code displayed on products;
- Events (invitation form or online forms on tablets filled out by our representatives with your input);
- Attending any of our experience courses or events;
- Brand Websites;



# Pernod Ricard Online Privacy Policy

- Training;
- Tastings;
- Feedback, questions, enquiries, surveys or comments through 'Contact us';
- Any other request that requires the submission of Personal Data.

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.

Personal Data we collect from other sources:

We may also collect information:

- from publicly accessible sources, to the extent permitted by applicable law;
- directly from a third party, e.g.: "Send to a friend" marketing communications or a third party sign-up form from one of our partners;
- from credit reference agencies to the extent permitted by applicable law;
- from customer due diligence providers;
- from a third party that you use;
- from cookies on our Website
- via our IT and other systems, e.g.: automated monitoring of our Website and other technical systems, such as our computer networks and connections, communications systems, email and instant messaging systems.;

We may also receive information if you have provided permission to other organisations to share it with us. Before providing permission to such third party organisations to share your personal information, you should check their privacy notices carefully. 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 who uses our Digital Media, which we get from third parties such as Google or social media that you use (we call this "Usage Information").

Usage Information may consist of the pages you visited, the time you visited them and which beverage information (or other content) you accessed or provided. It also includes which language you use, demographic information about you (such as your age, gender and interest areas, where available) and which pages you have visited before visited the current page.

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

Pernod Ricard uses tracking technologies such as cookies, IP Address recording or Log files, to gather technical information such as your web browser type and which operating system you use, the webpage you came from, your path through our Website and your Internet Service Provider. This is so we can improve the functionality of our Websites and better understand how visitors like you use our Digital Media and the tools they offer.

## Pernod Ricard Online Privacy Policy

Often, individuals will interact with us in multiple ways and will provide us with personal information in different contexts. We may use your personal information to obtain a profile of your different interactions with us and to understand your preferences.

These tracking technologies help us tailor our Digital Media to your personal needs:

- Subject to your consent where required by applicable law, our Digital Media use cookies and similar technologies ("Cookies"). Cookies are small files placed on your device which serve a number of purposes, such as remembering your preferences. Cookies let you enjoy a richer and more tailored browsing experience, as well as help to accurately measure your behaviour on our Website.
- An IP address is a number on a network to identify your computer every time you connect 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 certain users, (iv) track location and behaviour, analyse, segment and target advertising to customers, and, (v) better understand how our Digital Media is utilised e.g. using Google Analytics.
- We (or a third party on our behalf) may collect and use your mobile/tablet device ID to provide a more tailored browsing experience, to alert you to nearby events or promotions and for reporting and analysis.
- We (or a third party on our behalf) may collect information in the form of logs files that record activity and gather statistics about browsing habits. These entries are generated anonymously, and help us gather (among other things): (i) your browser type and operating system, (ii) information about your session (such as the URL you came from, the date and time you visited our Digital Media, and which pages you have viewed and for how long), and, (iii) other similar navigational or click-stream data. We also use log-file information for our internal marketing and demographic studies, so we can constantly improve and customize the online services we offer you. Log files are only used internally, and are not associated with any personally identifiable individual.

You can learn more about which cookies we use and how to disable them in our Cookie Policy available in the footer of each of our Website.

### 6. What happens if you do not wish to provide your Personal Data?

If you choose not to submit Personal Data as described in this Privacy Policy when requested notably through collection forms or when interacting with you, you may not be able to participate in certain activities or use some of the personalized features of our Digital Services. This may also limit the services and special offers we can provide you. For example, if you refuse to share your email address, you will not be able to receive any of our newsletters or otherwise register on our Digital Services. However, you do not need to give us any Personal Data to simply browse our websites and learn more about us and our products.

# Pernod Ricard Online Privacy Policy

## 7. To whom do we disclose your Personal Data and why?

- **To internal authorized 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, in particular from our [Brand companies](#), where Pernod Ricard affiliates provide support services (IT, administrative, marketing support) as processor of Pernod Ricard Asia Duty Free Limited.

- **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 the following **digital advertising platforms**, such as Facebook and Instagram, 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 policies on their websites.

- **To other third parties**

## Pernod Ricard Online Privacy Policy

**For marketing communication purpose**, we may disclose your personal data to our business partners only with your consent. In this context, your data is processed by the partner in question, who acts as the data controller. In such case, your data are subject to the data controller's general terms and conditions and to its own personal data protection policy. We recommend that you carefully review such information/documents before consenting to the disclosure of your data to our partners.

**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.

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

Pernod Ricard is a global company and your Personal Data may be transferred to countries outside Hong Kong where [Pernod Ricard affiliates](#) and third parties operate. 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. Such transfers will only take place if permitted and in compliance with applicable laws. For these transfers, Pernod Ricard takes the appropriate measures to ensure 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 a member of Pernod Ricard Group's instructions and implements all technical measures necessary on an ongoing basis to keep your Personal Data secure.

### 9. 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

# Pernod Ricard Online Privacy Policy

services. We may also retain your Personal Data for the applicable statute of limitation, 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 have to retain your Personal Data after you stop using Pernod Ricard services or our Digital Media according to comply with such obligations.

## 10. 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 that are not available to the public and that are only accessible to 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.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

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

You have the following rights, which you can exercise free of charge:

- **Access.** You can ask us to confirm whether we are processing your Personal Data and, if so, to provide you with a copy and inform you of the characteristics of the processing.
- **Rectification.** You can ask us to rectify or complete inaccurate or incomplete Personal Data.
- **Deletion.** You may ask us to delete your Personal Data in specific cases (e.g., if it is no longer required for the purposes for which it was collected, if you have withdrawn your consent).
- **Restriction.** 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).
- **Portability.** You can ask us to provide you with your Personal Data in a structured, commonly used and machine-readable format, or you can request that it be transferred directly to another data controller, but only where the processing is based on your consent or on the performance of a contract and the processing is carried out using automated processes.

## Pernod Ricard Online Privacy Policy

- **Right to object to marketing.** You may object at any time to your Personal Data being processed for direct marketing including profiling.
- **Withdrawal of consent.** You may withdraw your consent at any time to any processing of Personal Data based on your consent, where applicable, without compromising the lawfulness of the processing based on consent carried out prior to such withdrawal.

If you would like to exercise your right to object to direct marketing or any of your other rights, please contact us at any time by email to the contact details provided in Section 14 below.

Your objection (or withdrawal of consent) may mean we cannot provide the products or services you have requested of us or you may not be able to use the services we offer. We will advise you where this is the case. In certain circumstances even if you withdraw your consent we may still be able to process your Personal Data if required or permitted by law or for the purpose of exercising or defending our legal rights or meeting our legal and regulatory obligations.

If you participated in a program that involved a third party and you agreed to receive communications from that third party, you will need to contact them directly to opt-out. This process should be outlined in the third party's privacy policy.

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 Hong Kong, you can contact the **Office of the Privacy Commissioner for Personal Data, Hong Kong** via their website at: <http://www.pcpd.org.hk>

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

### 12. How 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. You must be or declare to be at least 18 years old to register or 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. If you wrongly declare you are at least 18 years old, Pernod Ricard cannot be liable for any consequences of your misdeclaration.

### 13. Do we link to other third-party websites?

Our Digital Media may contain links that will direct you to other websites or services that are operated and controlled by third parties. This includes links from advertisers, sponsors and partners that may use our brands or logo(s) as part of a co-branding agreement.

## Pernod Ricard Online Privacy Policy

The operators of other sites may collect information from you which will be used by them in accordance with their own data protection policy or privacy policy. We have no control over these third parties, and your use of their websites and features are subject to the privacy policies posted on those websites. We are not responsible or liable for the privacy practices or business practices of any third-party website. Therefore, you should exercise caution and review the privacy policies applicable to those external websites you visit, before you provide your Personal Data.

### 14. 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 Hong Kong and Macau  
A division of Pernod Ricard Asia Duty Free Limited  
25/F, Tower 5, The Gateway,  
15 Canton Road, Harbour City,  
Tsimshatsui, Kowloon,  
Hong Kong.*

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

You can also exercise your rights in this Privacy Policy, such as making an access, rectification or deletion request by sending an email to us at [hkdpo@pernod-ricard.com](mailto:hkdpo@pernod-ricard.com).

Pernod Ricard appointed a Global Data Protection Officer that you can reach at [group.dpo@pernod-ricard.com](mailto:group.dpo@pernod-ricard.com).

### 15. Changes to our Privacy Policy

We keep our Privacy Policy under regular review and we will place any updates on this web page. If we make material changes to how we collect, use, or share your personal information, we will notify you via email (sent to the last email address you provided) and/or by posting notice on our website. These changes will be effective 30 days after we send the email or post the notice. Material changes may impact how we handle personal information collected before the notification. If you disagree with these changes, you must notify us in writing before the effective date, as described in Section 14.

This Privacy Policy was last updated in March 2025.