

# Privacy Policy

Irish Distillers International Ltd., in its role as Data Controller, respects your right to privacy when you use our digital media (such as our websites, our mobile applications, our pages on the social network, any online forms to register for our events “Digital Media”) and communicate electronically with us.

The purpose of this Privacy Policy is to inform you how Irish Distillers International Ltd, a company registered in Ireland with company number 15558 and having its registered office at Simmonscourt House, Simmonscourt Road, Ballsbridge, Dublin 4 and its affiliated companies within the Pernod Ricard Group (“Irish Distillers”, “we,” or “our”) collect, store, use and process your Personal Data provided through any Digital Media operated by Irish Distillers. Irish Distillers International Ltd is the local Pernod Ricard entity when Ireland is selected as location of residence.

Please note that Irish Distillers International Limited markets products and services under various brands and will process the personal data you provide when interacting with any of these [brands](#).

## Privacy Policy Topics

Topics

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

## 1. WHAT PERSONAL DATA DO WE GATHER ABOUT YOU AND HOW DO WE COLLECT IT?

Personal Data is collected only for the purposes set out in Section 3 below and each time you use any of the features or services offered by our Digital Media. The types and amount of information collected when using the above-mentioned features and services may be updated and vary depending on the activities of Irish Distillers.

Most of the Personal Data we process is directly collected from you, in particular whenever you fill out a form on our Digital Media, at one of our Brand Homes or contact us. We also collect, with your consent, Personal Data concerning you whenever you browse on our Digital Media through the use of tracking technologies (in this respect see section 2 below as well as our Cookie Policy (for more details, our Cookie Policy is available in the footer of each of our Websites)).

We collect and process personal data relating to you in connection with your use of our Digital Media. This personal data may include:

- your name and contact details, including your address, phone number and email address;
- your age and/or date of birth;
- your credit/debit card or bank account details;
- your IP address;
- your gender;
- any other information relating to you that you provide to us or that we generate about you in connection with your use of our Digital Media.
- information to enable us to undertake financial checks on you to the extent permitted by applicable law

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 – which we may use to determine your preferences for the purposes of the offering you content more tailored to you. We may also use demographic and online activity information about the users of our Digital Media, which we may obtain from third parties such as Google or social media that you use (“Usage Information”). Usage Information may consist of the pages you viewed, the time you viewed them, which beverage information or other content you accessed or provide, in what language, including demographic information about you (such as your age, gender and interest areas, where available) and what pages you looked at before viewing the current page,

etc. We may also use your shopping history on our Digital Media, your email engagement with us, records of your attendance at our events and entries into competitions.

Subject to applicable law requirements, we may also use various tools that allow us to target the ads we display on social media. Your identity, contact and social media information (i.e., your profile data, social demographics, behavioural data, and interests) are processed in this context.

## 2. HOW AND WHY DO WE USE TRACKING TECHNOLOGIES?

Irish Distillers uses tracking technologies such as cookies, IP Addresses or Log files. Tracking technologies help us tailor our Digital Media to your personal needs and offer you content adapted to your interests.

- We use Cookies to better understand how visitors use our Digital Media and the tools and services offered and improve their use and functionality. Subject to your consent where required by applicable law, our Digital Media use cookies, and similar technologies (“cookies”). Cookies are small files that are placed on your device that serve a number of purposes like letting you navigate between pages efficiently, remembering your preferences, and generally improving your experience. The use of cookies on our Digital Media allows you to enjoy more seamless visits and more accurately measures your behaviour on our Digital Media. You can learn more about the cookies we use and how you can disable cookies in our Cookie Policy (for more details, our Cookie Policy is available in the footer of each of our Websites).
- An IP address is a number that is used by computers on the network to identify your computer every time you log on to the Internet. We may keep track of Internet Protocol (IP) addresses to (among other things): (i) troubleshoot technical concerns, (ii) maintain website safety and security, (iii) restrict access to our Digital Media to comply with applicable law or contractual restrictions, and (iv) better understand how our Digital Media is used.
- We (or a third party on our behalf) may collect information in the form of logs files that record activity on the Digital Media and gather statistics about users’ browsing habits. These entries are generated anonymously and help us gather (among other things) (i) a user’s browser type and operating system, (ii) information about a user’s session (such as the URL they came from, the date and time they visited our Digital Media, and which pages they’ve viewed on our Digital Media and for how long), and (iii) other similar navigational or click-stream data. We also use information captured in log

file for our internal marketing and demographic studies, so we can constantly improve and customise the online services we provide you. Log files are used internally only and are not associated with any particular user.

### 3. FOR WHAT PURPOSE DO WE USE YOUR PERSONAL DATA AND ON WHAT LEGAL GROUNDS?

We collect information about you to:

- **Respond to your request for services or to perform our contract (based on our legitimate interest, to carry out precontractual or contractual measures with you):**

- When you register or sign up for our Digital Media (mobile app, websites, social media, etc.), your Personal Data is used to provide you with the relevant features and services you subscribe to, and to offer you the benefits and privileges that typically come with your registration (e.g., management of your online account, being invited to events, participating in a sweepstake, etc.).
- Manage your order and deliver products purchased on our Digital Media. We can also implement technical solutions to detect fraudulent payments and to secure the payment of your purchases on our websites.
- Handle any claims or complaints you make about our products and/or services.

- **Send you transactional or administrative communications based on our legitimate interest or to carry out precontractual or contractual measures with you):**

- (e.g., confirmation email when you sign up for, or unsubscribe from, a specific registration or activity), as well as certain service-related announcements (e.g., notices about updates to our privacy notices, discontinued features or programs on our Digital Media, changes to our online services or technical support policies, or other related changes)

- **Allow us to send you marketing information when you consent:**

- We may use your Personal Data, with your consent, to send you announcements and promotional information about our products and services by email or by text messages. For example, if you are signing up for a contest or other promotion, you may also be invited to sign up for newsletters or alerts from our Digital Media hosting the promotion or from other websites.
- When you use the third-party sponsorship ("Send to a friend") feature: the 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 Irish Distillers 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.
- We may also, with your consent, collect and store your Personal Data for the purposes of maintaining a 'Digital Ledger' of visitors.

- **To fulfil our legitimate interest in better serving your needs:**

- Whenever this new processing is compatible with the processing for which you have given your consent, we may occasionally combine, update, or otherwise enhance the Personal Data collected through our Digital Media with data we receive from outside records or third parties. For instance, we may combine purely demographic or survey information (e.g., age, gender, household information, and other interests, etc.) not linked to any Personal Data about you with Personal Data collected through our offers (such as during account registration).
- We may use the combined above-mentioned information and/or demographic information for our internal marketing and demographic studies and to constantly improve, personalise, and customise the products and services we provide you to better meet your needs. Some of the tools we use may involve automated individual decision-making subject to applicable law.
- To fulfil our legitimate interest in better serving your needs, as well as assisting us with the other purposes of processing set out here, we use a third-party customer relationship management platform which may be used to store your personal data for the purposes of sending you communications from us. We use a shared database across some of our brands for the purpose of avoiding duplicated communications from different brands and to assist us in tailoring the communications we send. This means that your personal data collected and processed via one of our brand's Digital Media or other digital content may be used across our other brands.

**• Manage and track your inquiries and comments, including where relevant regarding compliance, via contact forms or contact email addresses:**

- for the performance of a contract in particular.

**Display targeted ads about Irish Distillers products and services on the social media you are registered on and measuring ad performance.** If you do not object to the use of your Personal Data for targeted advertising purposes, we will pass on your identification data (hashed) to the social media whose marketing tools we use (see section 5 below), that is to say your surname, first name, contact details and date of birth. Subject to your consent, social media can also identify you through the cookies placed on our Digital Media. Once your data is shared on social media, it is used to enable such media, at your initiative, to find you among other users, and (i) to show you ads about our products and services when you browse the relevant social media, and (ii) to identify, based on your profile on the relevant social media (where you live, age, gender, language, socio-demographic characteristics, interests and behaviour), lookalikes who may also be interested by Irish Distillers ads. Social media also provide us with reports on the results of our advertising campaigns (click-through rate, conversion rate, audience profile, etc.) to enable us to improve our future campaigns. In the context of these activities, we act as a joint controller together with each social media. We do not, however, collect or access at any time the Personal Data concerning you held by the social media concerned and relating in particular to your profile or your

behaviour on such social media. This type of Personal Data processing is based on our legitimate economic interest in offering relevant advertising content on social media, tailored to a specific audience.

We will ensure that your Personal Data remains accurate and up-to-date and avoid duplication in our database, by verifying each of your interactions with us and/or one of our affiliates to ensure your Personal Data is still accurate or needs to be completed or updated with the additional information you will have provided.

### **Profiling and Automated Decision Making**

- We may conduct profiling based on monitoring your browsing activities on our Digital Media to better understand your preferences and centre of interests and adapt our marketing communications to your profile, unless you object in the conditions set forth in Section 2 of this Privacy Policy.
- We may process Personal Data involving automated decision making, including for the performance of a contract (e.g., avoid fraudulent payment) or subject to your explicit consent, to better serve your needs in accordance with your preferences. Please note that the automated tools used are regularly checked to ensure that the Personal Data is processed fairly. Specific measures such as data minimisation are implemented when creating profiles.

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

## **4. WHAT HAPPENS IF YOU DO NOT WISH TO PROVIDE YOUR PERSONAL DATA?**

If you choose not to submit any Personal Data when requested, you may not be able to participate in certain activities and personalised features, or the Digital Media services and special offered to you may be limited. For example, if you refuse to share your email address, you will not be able to receive our newsletters or otherwise register on our Digital Media. However, to simply browse our Digital Media and learn more about Irish Distillers and our products, you do not need to give us any Personal Data. In any event, we will always inform you of the Personal Data that is necessary in order to benefit from a service.

## **5. TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA AND WHY?**

- To internal authorised employees and affiliates within the Pernod Ricard Group

Irish Distillers may share for the purposes mentioned in Section 3 your Personal Data to our employees, , including its [affiliates](#) worldwide in particular from our [Brand companies](#), where Pernod Ricard affiliates provide support services (IT, administrative, marketing support) as processor of Irish Distillers.

- To third parties

Irish Distillers may also share your Personal Data with third parties, but only in the following circumstances:

- For marketing purposes if you gave us your consent.
- For support purposes: We may use service providers, agents, or contractors to provide support for the internal operations of our Digital Media and to assist us with administering them or the various functions, programs, and promotions available on it. Any such third party shall at all times provide the same levels of security for your Personal Data as Irish Distillers and, where required, are bound by a legal agreement to keep your Personal Data private, secure and to process it only on the specific instructions of Irish Distillers.
- For joint and co-sponsored programs and promotional purposes: When we run a joint or co-sponsored program or promotion on our Digital Media with another company, organisation, or other reputable third party; and, as part of this event, collect and process Personal Data, we may share your Personal Data with our partner or sponsor, subject to your consent when required. If your Personal Data is being collected by (or is shared with) a company other than Irish Distillers as part of such promotion, we will let you know this at the time your Personal Data is collected.
- For targeted advertising purposes: we share your Personal Data with social media such as Facebook, Instagram, Pinterest, to display targeted ads on them about our products and services to you and people with a similar profile to you. In this context, the social media and Irish Distillers are acting as joint data controllers. We can provide you, on request, with a copy of the data processing agreements entered into with such social media. 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 websites.
- For litigation and safety purposes: We may also disclose your Personal Data if we are required to do so by law, or if in our good faith judgment, such action is reasonably necessary to comply with legal processes, to respond to any claims, or to protect the safety or rights of Irish Distillers, its customers, or the public;



In the event of a merger or acquisition of all or part of Irish Distillers by another company, or in the event that Irish Distillers were to sell or dispose of all or a part of the Irish Distillers business, the acquirer would have access to the information maintained by that Irish Distillers business, which could include Personal Data, subject to applicable law. Similarly, Personal Data may be transferred as part of a corporate reorganisation, insolvency proceeding, or other similar event, if permitted by and done in accordance with applicable law.

## 6. IS YOUR PERSONAL DATA SENT TO RECIPIENTS LOCATED IN OTHER COUNTRIES AND WHY?

Irish Distillers is a global company, and your Personal Data may be transferred across international borders to countries with a different level of data protection than 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. Irish Distillers takes the appropriate measures to maintain security of the Personal Data both during transit and at the receiving location by implementing contractual clauses as set out by the European Commission, in accordance with applicable law.

Our main service providers for the operation of our Digital Media are based in the United States, as are our partners. Transfers of personal data to these service providers and partners are implemented in accordance with applicable laws and rely on standard contractual clauses as set out by the European Commission. Such service providers and partners, when acting as processors, are also bound by a contract that ensures a high standard of privacy protection and requires (amongst other provisions) that they act only on Irish Distillers instructions and implement all technical measures necessary on an ongoing basis to keep your Personal Data secure.

## 7. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will store the Personal Data that you sent us via our Digital Media in our databases as long as your account is active, for the duration of the contract with you or as needed to provide you the services you requested or to answer queries or resolve problems, provide improved and new services. We may also retain your Personal Data in accordance with our internal retention procedure as necessary to comply with our legal and regulatory obligations, resolve disputes and enforce our agreements.

We may thus retain your Personal Data after you stop using Irish Distillers services or our Digital Media according to the statute of limitations.

## 8. HOW DO WE SECURE YOUR PERSONAL DATA?

Irish Distillers takes all necessary technical and organisational 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 authorised Irish Distillers 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.

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.

## 9. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?

- If your Personal Data has been processed on the basis of your consent, **you can withdraw your consent at any time**, without impact on lawfulness of processing based on consent before its withdrawal.
- You can request to access your Personal Data
- You can request to **rectify your Personal Data** if it is inaccurate, incomplete, or out of date
- You can request the **erasure** of your Personal Data (i) if your Personal Data is no longer necessary for the purpose of the data processing, (ii) you have withdrawn your consent on the data processing based exclusively on such consent, (iii) you objected to the data processing, (iv) the Personal Data processing is unlawful, (v) the Personal Data must be erased to comply with a legal obligation applicable to Irish Distillers. Irish Distillers will take reasonable steps to inform the other entities of the Irish Distillers group of such erasure.

You can request the **erasure** of your Personal Data (i) if your Personal Data is no longer necessary for the purpose of the data processing, (ii) you have withdrawn your consent on the data processing based exclusively on such consent, (iii) you objected to the data processing, (iv) the Personal Data processing is unlawful, (v) the Personal Data must be erased to comply with a legal obligation applicable to Irish Distillers. Irish Distillers will take reasonable steps to inform the other entities of the Pernod Ricard Group of such erasure.

- You can request the **restriction** of the processing (i) in the event the accuracy of your Personal Data is contested to allow Irish Distillers to check such accuracy, (ii) if you wish to restrict your Personal Data rather than deleting it despite the fact that the processing is unlawful, (iii) if you wish Irish Distillers to keep your Personal Data because you need it for your defence in the context of legal claims (iv) if you have objected to the processing but Irish Distillers conducts verification to check whether it has legitimate grounds for such processing which may override your own rights (v) if the data processing is based on the legitimate interest of Irish Distillers.

- You can request the **portability** of the Personal Data you provided to us, in particular if the Personal Data processing is based on your consent or the performance of a contract and is carried out by automated means (i.e., excluding paper files).
- You always have the option not to share any of your Personal Data with us. If you choose this option, you may be limited in the activities and features we can provide you.
- You have the right to object to the processing of your Personal Data by us, including for marketing purpose based on profiling, for the purposes of targeted advertising on social media or if the data processing is based on the legitimate interest of Irish Distillers (except if we can demonstrate compelling legitimate grounds for the processing).
- According to the local law, you have also the right to give general or specific instructions on how your personal data processed under this Privacy Policy may be used after your death.

## 10. HOW WE PROCESS CHILDREN’S PERSONAL DATA?

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

## 11. DO WE LINK TO OTHER THIRD-PARTY WEBSITES?

Our Digital Services 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.

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.

## 12. HOW CAN YOU CONTACT US OR LODGE A COMPLAINT WITH THE RELEVANT SUPERVISORY AUTHORITY?

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

Irish Distillers  
Simmonscourt House  
Simmonscourt Road  
Ballsbridge  
Dublin 4  
Ireland

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

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

### 13. CHANGES TO OUR PRIVACY POLICY

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

This privacy policy was last updated in February 2025.