Pernod Ricard, in its role as Data Controller, respects your right to privacy when you browse on the Club Premium's website https://club-premium.pernod-ricard.com/ (hereafter the "Website").

The purpose of this Privacy Policy is to inform you how Pernod Ricard S.A., a corporation duly organized under the laws of France, with its registered address at 5 cours Paul Ricard 75008 Paris, (hereafter "Pernod Ricard", "we", "us" or "our") collects, stores, uses and processes your personal data ("Personal Data") when you browse on the Website.

#### **Topics**

- 1. What type of Personal Data do we collect, for what purpose and on what legal grounds?
- 2. What happens if you refuse to provide your Personal Data?
- 3. To whom do we disclose Your Personal Data and why?
- 4. Is your Personal Data sent to recipients outside the European Union and why?
- 5. How long do we keep your Personal Data?
- 6. How do we secure your Personal Data?
- 7. What are your rights regarding your Personal Data?
- 8. How can you contact us or lodge a complaint with the relevant Supervisory Authority?
- 9. Changes to our Privacy Policy

# 1. What type of Personal Data do we collect, for what purpose and on what legal grounds?

The Personal Data we process is directly collected from you, in particular when you fill out a form on our Website or contact us. We also collect Personal Data concerning you when you browse on our Website using tracking technologies (See the cookies policy available in the footer of the Site).

For what purposes do we collect your Personal Data?	What type of Personal Data do we process?	On what legal grounds do we process your Personal Data?
Manage your request to subscribe subscription to Club Premium and manage your account	<ul> <li>Gender</li> <li>Name and surname</li> <li>Email address</li> <li>Postal address</li> <li>Number of shares</li> </ul>	Performance of a contract

Manage your request to unsubscribe from Club Premium	<ul><li>Gender</li><li>Name and surname</li><li>Email address</li></ul>	Performance of a contract
Manage your subscription and your participation to an event organized by Club Premium, and the participation of your companion where applicable	<ul> <li>Gender</li> <li>Name and surname (including your companion's where applicable)</li> <li>Email address</li> <li>Telephone number</li> </ul>	Performance of a contract
Send you emails regarding news and events organized by Club Premium via our newsletter as well as promotional information	<ul><li>Name and surname</li><li>Email address</li></ul>	Consent to receive promotional information
Answer any request sent via our contact form or through any other mean that you choose to contact us.	<ul><li>Contact information</li><li>Content of the request</li></ul>	Performance of a contract
Ensure the proper functioning of our website (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.)  \$\int \frac{For example}{state}  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.	<ul> <li>IP address</li> <li>online identifiers</li> </ul>	Pernod Ricard's legitimate interest to ensure the proper functioning of its website.  Your consent, when necessary
Optimize your user experience, provide you with advertising and content adapted to your interests through the setting of cookies on	<ul><li>IP address</li><li>Online identifiers</li></ul>	Your consent

our website – for more information you can refer to our Cookie Policy.		
Maintain the safety and security of our website and ensure fight against the fraudulent use of our websites or services	IP address	Pernod Ricard's legitimate interest, more specifically its business and economic interest to provide you with secure website and services.

### 2. What happens if you refuse to provide your Personal Data?

If you refuse to provide your Personal Data, you might be unable to benefit from the services offered on the Website.

For example, if you do not provide your Personal Data, we will not be able to validate your subscription to Club Premium nor your registration to events organized by Club Premium.

Either way, we will always indicate which Personal Data are necessary in order to benefit from a service.

### 3. To whom do we disclose Your Personal Data and why?

#### • To French affiliates of the Pernod Ricard Group

We may share your Personal Data to French affiliates of Pernod Ricard Group when necessary, in the context of your participation to an event.

#### • To Third Parties

We may share your personal data to third party beneficiaries, but only in the following cases:

- For support purposes: We may use service providers, agents or contractors to provide support for the operation of the Website and to assist us with administering it or its various functionalities available on it and to send you marketing communications if you have given your consent for this purpose. Any such third party shall at all times provide the same levels of security for your Personal Data as Pernod Ricard and, where required, are bound by a legal agreement to keep your Personal Data private, secure and to process it only on the specific instructions of Pernod Ricard:
- For litigation purposes: We may also have to disclose your Personal Data if we are legally required to do so or if we deem, in good faith, that such disclosure is reasonably necessary to

comply with legal proceedings, to respond to any claims or preserve Pernod Ricard' rights or safety, as well as its clients or the public.

# 4. Is your Personal Data sent to recipients outside the European Union and why?

In order to provide the Website and the offered services, transfers of Personal Data to service providers and partners, particularly for IT support, are carried out in a secure way in accordance with applicable laws and rely on standard contractual clauses as set out by the European Commission or Binding Corporate Rules where applicable. 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 Pernod Ricard's instructions and continuously implement all technical measures necessary to keep your Personal Data secure.

# **5.** How long do we keep your Personal Data?

We will store your Personal Data in our databases as long as you are a Club Premium member, for the duration of the contract with you or as needed to provide you with the services you requested, to answer queries or resolve problems, provide improved and new services.

We may also retain your Personal Data in accordance with our internal retention as necessary to comply with our legal and regulatory obligations, resolve disputes, and enforce our agreements.

If you consented to direct marketing (e.g., subscription to the newsletter), we will retain your Personal Data until you unsubscribe or until you request their deletion or at the end of a 3 years of inactivity period starting from the last contact with you.

The information collected through audience measurement cookie will only be retained for a maximum period of 25 months.

## **6.** How do we secure your Personal Data?

Pernod Ricard will take all necessary technical and organizational measures to protect the confidentiality and security of your Personal Data collected via our Website. 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 your Personal Data.

#### 7. 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 1 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 1, (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 1 of this Policy to understand which processing rely on these legal basis).
- If you are a French citizen, you also have the right to **give general and specific instructions** to decide the fate of your personal data after your death.
- You have the <u>right to object</u> to the processing of your Personal Data by us 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 1 of this Privacy Policy to understand which processing are based on Pernod Ricard's legitimate interests).

### **8.** How can you contact us or lodge a complaint with the relevant Supervisory Authority?

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

Pernod Ricard – Group DPO 5 cours Paul Ricard 75008 Paris France

Or by sending an email to: <a href="mailto:groupdpo@pernod-ricard.com">groupdpo@pernod-ricard.com</a>

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 the processing of your Personal Data by Pernod Ricard.

In France, you can contact the French Data Protection Authority (CNIL) via their website at: <a href="https://www.cnil.fr/">https://www.cnil.fr/</a>.

#### 9. Changes to our Privacy Policy

We keep our Privacy Policy under regular review and we will publish any updates on this web page.

This Privacy Policy was last updated in October 2025.