

Wyborowa Pernod Ricard Online Privacy Policy

Wyborowa Pernod Ricard 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 to our events etc.) and communicate electronically with us.

The purpose of this Privacy Policy is thus to inform you how **Wyborowa S.A.**, with its registered office in Poznań, ul. Janikowska 23, 61-070 Poznań and Pernod Ricard Group entities (all together **“Wyborowa Pernod Ricard”**, **“we,”** or **“our”**) collect, store, use and process the Personal Data you provide us through any digital media operated by Wyborowa Pernod Ricard (**“Digital Media”**).

When processing your Personal Data in the conditions described in this Privacy Policy, Wyborowa Pernod Ricard is the Data Controller of any Personal Data you submit to Wyborowa Pernod Ricard.

Before using our Digital Media, please read carefully this Privacy Policy (including the Wyborowa Pernod Ricard Cookie Policy, see Article 2). If you do not agree to this Privacy Policy or the Wyborowa Pernod Ricard Cookies Policy, do not use our Digital Media. We reserve the right to make changes to this Privacy Policy or the Wyborowa Pernod Ricard Cookies Policy for valid reasons, i.e. to adapt the Privacy Policy or the Cookies Policy to solutions provided in law or if such change is needed due to a decision of the court or other competent public authority or to implement new technical measures to secure privacy or if this is necessary for technical reasons related to services provided to you or if such need arises from the changed scope of services offered through another party. We will notify you of such changes. You are thus invited to regularly read this Privacy Policy and the Wyborowa Pernod Ricard Cookies Policy to make sure you are aware of any change and how your Personal Data may be used.

1. What Personal Data do we gather about you and how?

“Personal Data” for the purpose of this Privacy Policy means any information that can be used to personally identify you either directly or indirectly or contact you online or offline.

Personal Data is collected only for the purposes set out in Section 3 below and with your informed knowledge (i.e., when you knowingly provide it to us through one of the online forms available on our Digital Media) through various touch points, each time you participate in any of the features or services offered by our Digital Media, as they may evolve from time to time including without limitation:

- Registration or sign-up to our Digital Media (mobile app, web sites, social media, etc.);
- Send to a friend;
- Sweepstake and contest;
- Subscription to a program or newsletter;
- When joining our loyalty program;
- When using our connected products;
- Organization of events (invitation form or online forms on tablets filled out by our hostesses);

- Training
- Brand Home;
- Feedback, enquiry, surveys, questions, or comments through our “Contact Us” form;
- Any other request that requires the submission of Personal Data.

The types and amount of information collected for the features listed above will vary depending on the activity. The requested Personal Data will include your identification information as well as certain information related to your personal life and center of interests (depending on the activities you participate in).

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 as well as demographic 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, 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 so that we get a better idea of how our users interact with our brands and can then tailor and improve accordingly. Most Usage Information that we collect generally cannot be linked to you individually, but if we can link it to you then we will treat it as Your Personal Data in accordance with this Privacy Policy.

2. How and why do we use tracking technologies?

Wyborowa Pernod Ricard uses tracking technologies such as cookies, IP Address or Log files, to gather certain information such as browser type and operating system, referring page, path through site, domain of ISP etc. for the purpose of improving the use and functionality of our Digital Media and to better understand how visitors use our Digital Media and the tools and services offered on it. Tracking technologies help us tailor our Digital Media to your personal needs.

- 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, 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 behavior on our Site. You can learn more about the cookies we use and how you can disable cookies in the [\[Wyborowa Pernod Ricard Cookies Policy\]](#).
- 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 are used;
- We (or a third party on our behalf) may collect information in the form of log files that record activity on the Digital Media and gather statistics about users' Digital Media 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 files for our internal marketing and demographic studies, so we can constantly improve and customize the online services we provide to 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?

All Personal Data collected is used for the purposes for which you submitted the information to us and/or as otherwise identified at the collection point or in this Privacy Policy.

These purposes are mainly the following:

- **To respond to your request of service or for the performance of a contract**
 - When registering or signing-up in our Digital Media to provide you the service you subscribe to: the Personal Data you provide is used to offer you the benefits and privileges that typically come along with your registration, such as the ability to receive the communications you select at the time of registration (e.g. subscription to a newsletter, creation of an account, participation in a sweepstake or contest, invitation to or attendance to an event organized by Wyborowa Pernod Ricard);
 - Feedback, questions, or comments through our "Contact Us" form and our "Tell Us" compliance reporting system: if you contact us via an online contact form, your Personal Data is used to respond to your inquiry or comment.
 - We may also use your email address to send you transactional or administrative communications (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)
- **To allow us to send you marketing information on Wyborowa Pernod Ricard or its products provided you consented thereto:**
 - When you use the Send to a friend feature: Personal Data requested for a one-time use features (typically, names and email addresses) is used on a one-time basis (e.g., to send the communication) and is not further retained by us;
 - When you use a QR Code or equivalent feature displayed on Wyborowa 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;
 - When you accept our cookies in the conditions described in the [\[Wyborowa Pernod Ricard Cookie Policy\]](#);
 - When you provide Personal Data requested on the mobile devices such as iPads available in Heritage Centers, distilleries, we use it to send you more information on the products;

- 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 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.
- Upon 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 information mentioned above or demographic information for our internal marketing and demographic studies and to constantly improve, personalize, and customize the products and services we provide you to better meet your needs. Some of the tools we use may involve automated individual decision-making. In such case, you will be informed about the conditions of profiling and entitled to rely on additional safeguards to protect your rights as further described in Article 9 of this Privacy Policy.

- **Because it is also Wyborowa Pernod Ricard's legitimate interest to better serve you**
 - We will ensure that your Personal Data remains accurate and up to date and avoid duplication in our database, by checking upon each of your interaction with us or one of our affiliates whether your Personal Data is still accurate or need to be completed or updated with the additional information you will have provided.
 - After we inform you about that we may conduct profiling based on a monitoring of your browsing activities on our Digital Media to better understand your preferences and center of interests and adapt our marketing communications to your profile, unless you object in the conditions set forth in Article 9 of this Privacy Policy.

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 personalized features and it may happen that our Digital Media limit the services and special offers we can provide to you. 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 Wyborowa Pernod Ricard 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 are necessary in order to benefit from a service.

5. Who do we disclose your Personal Data to and why?

Wyborowa Pernod Ricard will never share your Personal Data with any third party that intends to use it for direct marketing purposes unless we have specifically informed you beforehand and you have given us specific permission to do this.

Wyborowa Pernod Ricard may share for the purposes mentioned in Article 3 your Personal Data with its related companies (collectively “Pernod Ricard Group”) notably, in the following circumstance: the information we collect as described in this Privacy Policy may come from the entity to which you provide it but may also be made available, subject to your consent, through such entity to other entities of the Pernod Ricard Group to provide you with news and promotional information about their products or programs you have shown interest in.

If you wish to withdraw your consent to such sharing and use of your information, please address your request as indicated in Article 9 of this Privacy Policy, with your name and your withdrawal that we share your Data with all or part of the entities of the Pernod Ricard Group (indicating the list of entities concerned), and to receive marketing information from them.

Wyborowa Pernod Ricard may also share your Personal Data with third parties, but only in the following circumstances:

- 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 Wyborowa Pernod Ricard and shall keep your Personal Data confidential, secure and to process it only on the specific instructions of Wyborowa Pernod Ricard;
- When we run a joint or co-sponsored program or promotion on our Digital Media with another company, organization, or other reliable 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 Wyborowa Pernod Ricard as part of such promotion, we will let you know this at the time your Personal Data is collected;

When running any promotion involving another company, we will, if applicable, provide a separate link to that company's privacy policy and we encourage you to read it before you share any Personal Data, as we cannot guarantee they adhere to the same privacy practices. If you do not want your Personal Data to be collected by or shared with a company other than ours, you can always choose not to opt in or participate in these events at the time the Personal Data is collected/requested;

- We may also disclose your Personal Data if we are required to do so by law, or if we have legitimate grounds to believe that such action is necessary to comply with legal requirements, to respond to any claims, or to protect the safety or rights of Wyborowa Pernod Ricard, its customers, or others;
- In the event of a merger or acquisition of all or part of Wyborowa Pernod Ricard by another company, or in the event that Wyborowa Pernod Ricard were to sell or dispose of all or a part of the Wyborowa Pernod Ricard business, the acquirer would have access to the information maintained by that Wyborowa Pernod Ricard business, which could include Personal Data, subject

to applicable law. Similarly, Personal Data may be transferred as part of a corporate reorganization, bankruptcy proceeding, or other similar event, if provided by law;

- We may share aggregate demographic or survey Personal Data with third parties, but this data is in anonymous form which does not allow re-identification. The aggregate data that we share may include anonymous data that is captured through the use of cookies and other similar tracking technology, as explained in Article 2.

6. Are your Personal Data sent to recipients located in other countries and why?

Pernod Ricard is a member of the global Pernod Ricard Group and your Personal Data may be transferred across international borders. It may be transferred to countries that have a different level of personal 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. Wyborowa Pernod Ricard takes the appropriate measures to maintain security of the Personal Data both during transit and at the receiving location by implementing agreements relying on standard personal data protection clauses as adopted by the European Commission, in accordance with applicable law requirements. You may consult the list of countries where Wyborowa Pernod Ricard has an affiliate likely to receive your Personal Data by clicking [here](#)

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 is implemented in accordance with applicable laws and rely on standard personal data protection clauses as adopted 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 Wyborowa Pernod Ricard instructions and implement all technical measures necessary on an ongoing basis to keep your Personal Data secure. You have a right to obtain details of the mechanism under which your data is transferred outside of the EEA by contacting.

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, as we have a contract with you or as needed to provide to you the services you requested or to answer queries or resolve problems, provide improved and new services. We may also need that your Personal Data be retained for a longer period in accordance with our internal retention procedure if this is necessary to comply with our obligations prescribed by commonly applicable law, to resolve disputes and enforce our agreements.

We may thus retain your Personal Data after you stop using Wyborowa Pernod Ricard services or our Digital Media. Other recipients of your Personal Data described in Article 5 may retain your Personal Data for a longer period where doing so is necessary to fulfil the purpose for which you allowed us to share your Personal Data with them, or for their own compliance, dispute resolution, enforcement, or record management purposes as provided by applicable law.

Retention periods applicable to Cookies and other trackers are further detailed in [\[Wyborowa Pernod Ricard Cookies Policy\]](#).

8. How do we keep your Personal Data secure?

Wyborowa Pernod Ricard takes all necessary technical and organizational measures to protect the confidentiality and security of your Personal Data collected from this website or our applications (Digital Media), including sensitive Personal Data. 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 Wyborowa 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.

9. How can you exercise your rights regarding the use of your Personal Data?

To exercise your rights related to your Personal Data processing, you can contact us at the address given in Article 12 below:

- If your Personal Data has been processed on the basis of your consent, **you can withdraw your consent at any time; withdrawal of consent does not affect the lawfulness of your Personal Data processing before withdrawal.**
- You can request **to access** your Personal Data, including the categories of data that are used in profiling or decision making process
- You can request **to rectify your Personal Data** if it is inaccurate, incomplete or out of date, including in the profile
- You can request the **erasure** of your Personal Data if (i) 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 Wyborowa Pernod Ricard. Wyborowa Pernod Ricard will take reasonable steps to inform the other entities of the Wyborowa 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 Wyborowa Pernod Ricard to check such accuracy, (ii) if you wish to restrict your Personal Data processing rather than deleting it despite the fact that the processing is unlawful, (iii) if you wish Wyborowa Pernod Ricard to keep your Personal Data because you need it for your defense in the context of legal claims, (iv) if you have objected to the processing but Wyborowa Pernod Ricard conducts verification to check whether it has legitimate grounds for such processing which may override your own rights.
- You can request **the portability** of the Personal Data you provided to us in cases provided by law, in particular if the Personal Data processing is based on your consent or is necessary for the performance of a contract.
- 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.**

If you do not want to receive newsletters, announcements, or other communications or services from our Digital Media, please do not opt-in for those communications or services at the time of registration. If you have opted-in and, at a later time, wish to opt-out, **please click on the unsubscribe link** inserted in our communications.



Along with every e-mail communication sent to you, we provide you with the opportunity to discontinue receiving future communications (i.e., unsubscribe). Simply follow the unsubscribe process or directions provided in the email.

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.

In addition, if you participated in a program that involved a third party and, as part of that, you agreed to receive future communications directly from that third party, you will need to contact the third party directly to opt-out from such communications. This process may be outlined in the third party's privacy policy.

When exercising your rights, you may be asked for a proof of identity.

Wyborowa Pernod Ricard will not process Personal Data involving automated decision making, unless if necessary for the performance of a contract (e.g. to avoid fraudulent payment) or subject to your explicit consent, to better serve your needs in accordance with your preferences. Please note that in such case, you will be informed through layered notices on the conditions of processing of your Personal Data, the profile built, how the profile is used, and the logic involved. You will be requested to explicitly consent to such profiling, if it is not necessary for the performance of a contract.

Please note that the automated tools used are regularly checked to ensure that the Personal Data processing is made fairly. Specific measures such as data minimization are implemented when creating profiles. You are invited to express your point of view through the right of access described above. You can also contest the result of the automated decision by sending an email to the contact address given in Article 12 below.

10. How do we treat children's Personal Data?

Our Site is not intended for children under the age of majority ("**Minors**"), 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 on our Digital Media. By creating an account or engaging in activities on our Digital Media, you affirm that you are at least eighteen years old and are able to agree to comply with our [\[Terms of Use\]](#) and this Privacy Policy. 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 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 logo(s) as part of a co-branding agreement. We have no control over these third parties, and your use of their websites and features are subject to their privacy policies posted on those sites. 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 the external websites you visit before providing your Personal Data.

12. How can you contact us or the relevant Supervisory Authority?

If you have any questions, complaints, or comments regarding this Privacy Policy or our information collection practices, please contact Wyborowa Pernod Ricard or send an email to: [\[regulamin@wyborowa.com\]](mailto:regulamin@wyborowa.com).

You are informed that you can also lodge a complaint with the President of the Personal Data Protection Office (*Prezes Urzędu Ochrony Danych Osobowych*) if you have any concern about the conditions of processing of your Personal Data by Wyborowa Pernod Ricard.

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