

Pernod Ricard Malaysia Privacy Policy

Pernod Ricard Malaysia, 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...) and communicate electronically with us.

The purpose of this Privacy Policy is to inform you how Pernod Ricard Malaysia, (PRM), an affiliate of the Pernod Ricard group (all together "Pernod Ricard Malaysia", "we" or "our"), collect, store, use and process your Personal Data provided through any digital media operated by Pernod Ricard ("Digital Media").

Topics:

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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 participate in any of the features or services offered by our Digital Media.

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 Malaysia.

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 the users of our Digital Media, which we may obtain from third parties such as Google or social media that you use ("Usage Information"). The data we collect on the site ("<https://swiftnights.martell.com/>") is subject to User's opt in consent before their data is collected by us.

2. How and why do we use tracking technologies?

Pernod Ricard Malaysia uses tracking technologies such as cookies, IP addresses or Log files. 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 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 behavior on our Site.
- 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 customize 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 based on which legal grounds?

We collect information about you to:

- **Respond to your request of service or for the performance of a contract**

- When you register or sign-up in 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 offer you the benefits and privileges that typically come along with your registration, (being invited to events, participating in a sweepstake etc.);
- **When you purchase products on our websites**, we use your Personal Data to manage your order and deliver your products. We can also implement technical solutions to detect fraudulent payment and secure the payment of your purchases on our websites;
- **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);
- **Allow us to send you marketing information when you consent:**
 - 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 express consent to have your Personal Data recorded and 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 to 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 the 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;
- **Because it is also Pernod Ricard Malaysia’s legitimate interest to better serve you:**
 - Subject to your consent when required, 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, 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 subject to applicable law.
 - Feedback, questions, or comments through our “Contact Us”: if you have contacted us via an online contact form, your Personal Data is used to respond to your inquiry or comment.
 - 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.
 - We may conduct profiling based on monitoring 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.

Pernod Ricard Malaysia 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 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 object the result of the automated decision by sending an email to the contact details in Section 11 below.

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

If you choose not to submit certain types of Personal Data which are indicated as necessary when requested, you may not be able to participate in certain activities and personalized features, or the Digital Media services and special offers 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 our products, provision of such Personal Data is voluntary, and 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?

- **Within the Pernod Ricard group**

Pernod Ricard Malaysia may share for the purposes mentioned in Section 3 your Personal Data within the Pernod Ricard group, including its affiliates worldwide.

- **With third parties**

Pernod Ricard Malaysia 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 Pernod Ricard Malaysia and, when 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 Malaysia.
- **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, organization 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 Pernod Ricard Malaysia as part of such promotion, we will let you know this at the time your Personal Data is collected;
- **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 Pernod Ricard Malaysia, its customers, or the public;
- **In the event of a merger or acquisition** of all or part of Pernod Ricard Malaysia by another company, or in the event that Pernod Ricard Malaysia were to sell or dispose of all or a part of the business, the acquirer would have access to the information maintained by Pernod Ricard Malaysia, 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.

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

Pernod Ricard Malaysia is part of a global company, and your Personal Data may be transferred across international borders. 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 are submitting your Personal Data. Your Personal Data may also be transferred between different companies of the Pernod Ricard Group located in different countries. Pernod Ricard Malaysia 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. 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 Pernod Ricard Malaysia instructions and implements 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 Pernod Ricard Malaysia services or our Digital Media according to the statute of limitations.

8. How do we secure your Personal Data?

Pernod Ricard Malaysia takes all necessary technical and organizational measures to protect the confidentiality and security of your Personal Data collected from this website and/or our applications, 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 Pernod Ricard Malaysia employees, our agents and contractors; and (ii) verifying the identities of registered users before they can access the Personal Data we maintain about them.

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**
- 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 restriction of the processing** (i) in the event the accuracy of your Personal Data is contested to allow Pernod Ricard Malaysia to check such accuracy, (ii) if you wish to restrict the processing of your Personal Data rather than deleting it despite the fact that the processing is unlawful.
- 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.**

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

Our Site is not intended for children under the legal drinking age (21 years of age) ("Minor"), so we do not knowingly collect personal data from Minors. You must be the legal drinking age to create an account and engage 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. 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 or wish to exercise any of your rights as described in Section 9 above, please contact us by writing to:

Consumer Journey and Digital - Manager

Telephone: 603-7953 8861

or by sending an email to: enquiry-MY@pernod-ricard.com

12. Changes to our Privacy Policy?

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

In the event of any conflict between the English or other language versions of this Privacy Policy, the provisions in this Privacy Policy shall prevail.

This Privacy Policy was last updated in April 2024.