

CAMPARI GROUP

PRIVACY NOTICE

Last Modified: December 2021

Thank you for your interest in Campari! This Privacy Notice explains how information about you, that directly identifies you, or that makes you identifiable (“**personal information**”) is collected, used, disclosed, and otherwise processed by Campari in connection with our Services.

When we use the terms “**Campari**”, “**Campari Group**”, “**we**”, “**us**”, or “**our**” in this Privacy Notice, we are referring to Davide Campari-Milano N.V., and its affiliates and subsidiaries. When we use the term “**Service**,” we are referring to all of the services and product offerings that we offer on our own behalf, including our product offerings such as our website <https://www.campari.com/>, our mobile applications, or any other Campari Group product or service that posts or links to this Privacy Notice.

GLOBAL APPLICABILITY AND REGION-SPECIFIC DISCLOSURES

This Privacy Notice is designed to apply to our website visitors, users of our Service, and other companies and users on a global basis. We may choose or be required by law to provide additional disclosures relating to the processing of personal information in certain countries, regions or states. Please refer below for disclosures that may be applicable to you:

- **California (United States):** If you are a resident of the State of California in the United States, please see [Additional Notice for California Residents](#) for additional California-specific privacy information.
- **Nevada (United States):** If you are a resident of the State of Nevada, Chapter 603A of the Nevada Revised Statutes permits a Nevada resident to opt out of future sales of certain covered information that a website operator has collected or will collect about the resident. Note we do not sell your personal information within the meaning of Chapter 603A. However, if you would still like to submit such a request, please contact us at gdpd.office@campari.com
- **European Economic Area, United Kingdom or Switzerland:** If you are located in the European Economic Area (“**EEA**”), United Kingdom (“**UK**”) or Switzerland, or otherwise engage with Campari Group’s European operations, please see the [Additional Notice for the European Economic Area, United Kingdom and Switzerland](#) for additional European-specific privacy information, including, but not limited to, what constitutes your personal information, the lawful bases we rely on to process your personal information, how we use cookies when you access our Services from the EEA, UK or Switzerland and your rights in respect of your personal information.

1. HOW WE COLLECT YOUR PERSONAL INFORMATION

From the first moment you interact with us, we are collecting personal information about you. Sometimes we collect personal information automatically when you interact with our services and sometimes, we collect the personal information directly from you. At times, we may collect personal information about you from other sources and third parties, even before our first direct interaction. The type of personal information we collect may also depend on the relationship we have with you (e.g., business representative, consumer).

CONTROLLERS

The controller, which is the company belonging to the Campari Group that is responsible for the processing of your personal data, depends on how you interact with the Campari Group brands. As such, the relevant controller will typically consist of one or two entities: (1) The main entity who manages the Campari brands based on region, and, if applicable, (2) the local company you interact with in connection with localized activities (e.g., marketing campaigns, events, competitions). In connection with the local controller, the controller and contact information will be disclosed in the specific method of interaction.

These controllers are specified in the following tables:

| MAIN CONTROLLERS (BASED ON BRANDS) | | |
|--|--|--|
| <p>CONTROLLER: CAMPARI AMERICA LLC 1114 AVENUE OF THE AMERICAS FL 19 NEW YORK, NY, 10036-7703 GDPD.OFFICE@CAMPARI.COM</p> | <p>CONTROLLER: DAVIDE CAMPARI - MILANO N.V. VIA F. SACCHETTI, 20 – 20099 SESTO SAN GIOVANNI (MILAN) – ITALY GDPD.OFFICE@CAMPARI.COM</p> | <p>CONTROLLER: SOCIÉTÉ DES PRODUITS MARNIER LAPOSTOLLE S.A. 32 RUE DE MONCEAU, 75008 PARIS GDPD.OFFICE@CAMPARI.COM</p> |
| <p>BRANDS AMERICAN HONEY APPLETON ESTATE BOND & LILLARD CABO WABO SKYY WILD TURKEY LONGBRANCH RUSSELL'S RESERVE WRAY & NEPHEW FORTY CREEK PRINCE IGOR ESPOLON ANCHO REYES MONTELOBOS KOKO KANU SANGSTERS CORUBA OLD EIGHT DRURY'S DREHER SAGATIBA SAFFELL</p> | <p>BRANDS APEROL APEROL SPRITZ AVERNA BANKES-BICKENS BARBERO LIQUORS BRAULIO BIANCOSARTI BULLDOG GIN CAMPARI CAMPARINO CAMPARISODA CINZANO CORTE DELLA FRATESSA CRODINO CRODINO SPRITZ CRODINO TWIST DIESUS CROSS CYNAR FRANGELICO LIQUEUR FRATTINA GLEN GRANT MAGNUM TONIC WINE MAISON LAMAUNY MONDORO ONDINA GIN OUZO 12 RICCADONNA TERRAZZA APEROL THE NOTES COLLECTION RICCADONNA SPARKLING WINESX-RATED FUSION LIQUEUR ZEDDA PIRAS MIRTO ZEDDA PIRAS OTHER TYPICAL LIQUORS</p> | <p>BRANDS GRAND MARNIER BISQUIT & DOUBOUCHÉ LALLIER CHAMPAGNE MARNIER RHUM WINE & CHAMPAGNE LVMH</p> |

| LOCAL COMPANIES (LOCALIZED CONTROLLERS) | | |
|--|---------------|----------------|
| COUNTRY | ENTITY | ADDRESS |
| | | |

| | | |
|---------------------|---|---|
| AUSTRIA | CAMPARI AUSTRIA GMBH | NAGLERGASSE 1/TOP 13 ,1010, WIEN |
| BENELUX | CAMPARI BENELUX S.A. | RUE AUX LAINES 70, 1000 BRUSSELS |
| ARGENTINA | CAMPARI ARGENTINA S.A. | OLGA COSSETTINI, 243 PISO 3, PUERTO MADEO, CABA, ARGENTINA |
| AUSTRALIA | CAMPARI AUSTRALIA PTY LTD. | LEVEL 21, 141 WALKER STREET NORTH SYDNEY, AUSTRALIA |
| BRASIL | CAMPARI DO BRASIL LTDA. | ALAMEDA RIO NEGRO 585, EDIFICIO DEMINI, CONJUNTO 62, ALPHAVILLEBARUERI-SP |
| CANADA | FORTY CREEK DISTILLERY LTD. | 297 SOUTH SERVICE ROAD WEST, GRIMSBY, CANADA |
| CHINA | CAMPARI (BEIJING) TRADING CO. LTD. | ROOM 66, FLOOR 5, BLOCK 1, No.16, CHAOYANGMENWAI STREET, CHAOYANG DISTRICT, BEIJING, CHINA |
| GERMANY | CAMPARI DEUTSCHLAND GMBH | ADELGUNDENSTRASSE 7, 80538 MÜNCHEN, DEUTSCHLAND |
| GREECE | KALOYIANNIS - KOUTSIKOS DISTILLERIES S.A. | 6 & E STREET, A' INDUSTRIAL AREA, VOLOS |
| INDIA | CAMPARI INDIA PRIVATE LTD. | CoWrks, GROUND FLOOR AND FIRST FLOOR, WORLDMARK 1, ASSET AREA 11. AEROCITY, HOSPITALITY DISTRICT, INDIRA GANDHI INTERNATIONAL AIR-PORT, NH-8. NEW DELHI - 110037, INDIA |
| ITALY | CAMPARINO S.R.L. | PIAZZA DUOMO, 21 MILANO |
| ITALY | TERRAZZA APEROL SRL | CAMPO SANTO STEFANO SAN MARCO 2776 30124 VENEZIA (VE) |
| JAMAICA | J. WRAY&NEPHEW LTD. | 23 DOMINICA DRIVE, KINGSTON 5, JAMAICA |
| MEXICO | CAMPARI MEXICO S.A. DE C.V | AVENIDA AMERICAS 1500 PISO G-B COLONIA COUNTRY CLUB, GUADA-LAJARA, JALISCO, MEXICO |
| NEW ZEALAND | CAMPARI NEW ZEALAND LTD. | C/O KPMG 18, VIADUCT HARBOUR AV., MARITIME SQUARE, AUCKLAND NEW ZEALAND |
| PERÙ | CAMPARI PERU SAC | AV. JORGE BASADRE NO.607, OFICINA 702, DISTRITO DE SAN ISIDRO, LIMA, PERÙ |
| RUSSIA | CAMPARI RUS OOO | 2ND YUZHNOPORTOVYIY PROEzd 14/22, MOSCOW, RUSSIA |
| SINGAPORE | CAMPARI SINGAPORE PTE LTD. | 152 BEACH ROAD, #28-05-08, GATEWAY EAST, SINGAPORE 189721 |
| SOUTH AFRICA | CAMPARI SOUTH AFRICA PTY LTD. | 12TH FLOOR, CLIFFE DEKER HOF-MEYR 11 BUITENGRACHT STREET, CAPE TOWN, SOUTH AFRICA |

| | | |
|----------------|----------------------|--|
| SPAIN | CAMPARI ESPAÑA S.L. | CALLE DE LA MARINA 16-18, PLANTA 29, BARCELONA |
| SWITZERLAND | CAMPARI SCHWEIZ A.G. | LINDENSTRASSE 8, BAAR |
| UNITED KINGDOM | GLEN GRANT LTD. | GLEN GRANT DISTILLERY, ROTHES, MORAYSHIRE ELGIN ROAD, TRADING AS CAMPARI UK, LEVEL 27, THE SHARD, 32 LONDON BRIDGE STREET, LONDON SE1 9SG |
| UKRAINE | CAMPARI UKRAINE LLC | 8, ILLINSKA STREET, 5 FLOOR, BLOCK 8 AND 9, KIEV, UKRAINE |

Personal Information You Provide

We may collect the following personal information you provide in connection with our Service:

- **Legal Drinking Age Verification:** When you first visit our website, we may collect your date of birth to confirm you are of legal drinking age.
- **Account Creation and Profile Information.** We may collect personal information that you provide when you register for an account (where available). This information includes your full name, email address, and password. Once you create an account, you may also be able to update your account information, such as your name, phone number, email address, date of birth, and your preferences.
- **Reservations:** When you make an online reservation with any of our brand houses, for instance, an aperitivo or dinner reservation, we collect information required make your booking, which may include your first name, last name, mobile number, email address, number of guests attending, and any information you provide in the comments section (e.g., preferences, special requests).
- **Payment information:** If you sign up for one of our Services requiring payment or purchase one of our products, we collect the information provided in connection with such payment. Please note that we use third party payment processors to process payments made to us. As such, we do not retain any personally identifiable financial information such as credit card numbers. Rather, all such information is provided directly by you to our third-party processor. The payment processor’s use of your personal information is governed by their privacy notice.
- **Communications:** When you contact us through any method of communications, including through one of our Website “Contact Us” forms, we may collect your name, email address, mailing address, phone number, type of inquiry, or any other personal information you choose to provide to us.
- **Demographic Information:** When you fill out one of our surveys or market research inquiries, we may collect demographic information, including your age, gender, or annual income, and other information about your business including, for example, your annual revenues and target demographic. The information collected depends on the survey and Campari Group company conducting such survey.
- **Newsletter / Marketing Emails.** If you sign up to receive news or alerts from us, we may collect your email and applicable interests and communication preferences. If you wish to stop receiving email messages from us, you can use the “unsubscribe” link at the bottom of our emails to opt-out of these communications.
- **Events, Surveys, and Promotions.** If you fill out any forms or participate in Campari Group events, surveys, competitions (contests/sweepstakes), or other promotional events, we may collect your contact information (such as your name, email, and phone number, postal code), your Demographic Information, and any other information requested on the form, at sign up, or a part of your competition entry, including photos/videos (each, as applicable). On occasion, we may also collect your shipping and billing information, such as if you are a competition winner or purchase our products or services (where available). If you are part of our event or

promotion partner, we may also collect your personal information including your name, company email, and company address.

- **Feedback Information:** We may also collect feedback and ratings you provide relating to our services or products.
- **Business Representative Contact Information:** If you are a business representative, we collect your information in connection with the performance of the agreement or potential agreement with us. This information may include your first name, last name, company contact information (e.g. email, phone, address), job title, and any other information related to the performance of the agreement with us.

Although we often collect the personal information described above directly from you, we also collect this information through service providers and other third parties that collect it on our behalf, such as communications providers, analytics providers, survey, contest and promotion entry providers and marketing providers. Please see the [Personal Information from Other Sources and Third Parties](#) section below.

Personal Information Automatically Collected

As is true of most digital platforms, we and our third-party providers and partners collect certain personal information automatically when you visit or interact with our Service:

- **Log Data:** Including your internet protocol (IP) address, operating system, browser type, browser ID, the URL you entered and the referring page/campaign, date/time of your visit, the time you spent on our services and any errors that may occur during your visit to our services. Please note that our systems may also record personal information that you type into our websites and other online services even if you do not choose to submit it.
- **Analytics Data:** Including the electronic path you take to our services, through our services and when exiting our services, as well as your usage and activity on our services, such as the links, objects, products and benefits you view, click or otherwise interact with (also known as “**Clickstream Data**”). Our emails may also contain tracking pixels that identify if and when you have opened an email that we have sent you, how many times you have read it and whether you have clicked on any links in that email. This helps us measure the effectiveness of our marketing email campaigns, make the emails we send to you more relevant to your interests and to understand if you have opened and read any important administrative emails we might send you.
- **Location Data:** Including your general geographic location based on the Log Data we collect.
- **Application Data:** Some of our services offer mobile or browser applications to allow you to take advantage of our service offerings on the go and/or when visiting third-party websites and other online services. Certain of these applications also allow us to access more precise Location Data about you and collect information about your use and interactions with third-party websites and online services (including the products or services you are interested in or purchase) to better serve you.
- **Advertising Data:** we also collect and use some Log Data and Analytics Data (with your consent, as may be required by applicable laws) to run advertising campaigns, including displaying targeted ads, using advertising networks, social media companies and other third-party services. For more information about these practices, please see our [Cookie Notice](#).

We and our third-party providers may use (i) cookies or small data files that are stored on an individual’s computer and (ii) other, related technologies, such as web beacons, pixels, embedded scripts, location-identifying technologies, and logging technologies (collectively, “**cookies**”) to automatically collect this personal information.

For more information about these practices and your choices regarding cookies, please see our [Cookie Notice](#).

Personal Information from Other Sources and Third Parties

We may also obtain personal information from third parties and other sources, which we often combine with personal information we collect either automatically or directly from an individual.

We may receive the same categories of personal information as described above from the following third parties:

- **Campari Group:** We may collect personal information from other companies owned or controlled by Campari Group, and other companies owned by or under common ownership as Campari Group, which also includes our subsidiaries (i.e., any organization we own or control) or our ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns, particularly when we collaborate in providing the Services.
- **Social Media:** When an individual interacts with our Services through various social media networks, such as when someone “Likes” us on Facebook or follows us or shares our content on Google, Facebook, Twitter, or other social networks through, for example, our website sharing buttons, we may receive some information about individuals that they permit the social network to share with third parties. The data we receive is dependent upon an individual’s privacy settings with the social network. Individuals should always review and, if necessary, adjust their privacy settings on third-party websites and social media networks and services before sharing information and/or linking or connecting them to other services.
- **Service Providers:** Our service providers that perform services solely on our behalf, such as chat services, payout processing and marketing providers, collect personal information and often share some or all of this information with us.
- **Information Providers:** We may from time to time obtain information from third-party information providers to correct or supplement personal information we collect. For example, we may obtain updated contact information from third-party information providers to reconnect with an individual.
- **Information from Other Sources:** We may also collect personal information about individuals that we do not otherwise have from, for example, publicly available sources, third-party data providers, customers, business partners, or through transactions such as mergers and acquisitions. Such information may include contact information and interest-in-services information. We may combine this information with the information we collect from an individual directly, and will acquire consent to do so where required by applicable law. We use this information to contact individuals, to send advertising or promotional materials or to personalize our Services and to better understand the demographics of the individuals with whom we interact.

In all of these instances, our Privacy Notice governs the handling of your personal information. Note we do not control the personal information that third parties collect or how they use that personal information. You should review the third parties' privacy policies for more information about how they collect, use, and share information they obtain and use.

2. HOW WE USE YOUR PERSONAL INFORMATION

We use personal information we collect:

- Fulfill or meet the reason the information was provided, such as to fulfill our contractual obligations, to deliver the Services you have requested, including facilitating your messages to other users or groups;
- Manage our organization and its day-to-day operations;
- Communicate with individuals, including via email, text message, messaging apps, social media and/or telephone calls, video conferencing.
- Market our Services to individuals, including through email, direct mail, phone or text message, social media and advertising networks, messaging apps, video conferencing;
- Administer, improve and personalize our Services, including by recognizing an individual and remembering their information when they return to our Services;
- Process payment for our Services;
- Facilitate user benefits and services, including customer support;
- Identify and analyze how individuals use our Services;
- Conduct research and analytics on our client base and our Services;

- Improve and customize our Services to address the needs and interests of our user base and other individuals we interact with;
- Test, enhance, update and monitor the Services, or diagnose or fix technology problems;
- Help maintain the safety, security and integrity of our property and Services, technology assets and business;
- Enforce our [Terms of Service](#), resolve disputes, carry out our obligations and enforce our rights, and protect our business interests and the interests and rights of third parties;
- Defend, protect or enforce our rights or applicable contracts and agreements;
- Prevent, investigate or provide notice of fraud or unlawful or criminal activity;
- Fulfill any other purpose for which you provide personal information; and
- Comply with legal obligations.

Where an individual chooses to contact us, we may need additional information to fulfill the request or respond to inquiries. We may provide you with additional privacy-related information where the scope of the inquiry/request and/or personal information we require fall outside the scope of this Privacy Notice. In that case, the additional privacy notice will govern how we may process the information provided at that time.

3. HOW WE SHARE PERSONAL INFORMATION

We may also share, transmit, disclose, grant access to, make available, and provide personal information with and to third parties, as described below.

- **Service Providers:** We share personal information with third party contractors and service providers who perform services on our behalf, which are subject to reasonable confidentiality terms, and which may include processing payments, providing web hosting and maintenance services, technology support providers, reservations management, email communications providers, analytics providers, data storage providers, competition management, and web and video hosting providers and developers.
- **Campari Group:** We may share with other companies and brands owned or controlled by Campari Group, and other companies owned by or under common ownership as Campari Group. These companies will use your personal information in the same way as we can under this Privacy Notice.
- **Business Partners:** We may disclose personal information to our business partners and other stakeholders for transactional and marketing purposes, including to promote their own products or services. For example, we may disclose personal information with business partners to provide events, contests, sweepstakes, or referral programs in which you choose to participate. In such instances, the processing of your personal information will be subject to the business partners' privacy notice.
- **Data Analytics Providers:** We may share personal information with data analytics providers who analyze statistics and trends relating to the usage of and activity relating to our services. These data analytics providers produce reports and make suggestions for our customer and business strategy based on the personal information and other information analyzed.
- **Online Advertising Partners:** We may also share personal information with advertising networks or permit these partners to collect information from you directly on our websites to facilitate online advertising, such as search engines and social network advertising providers to serve targeted ads to you or to groups of other users who share similar traits, such as likely commercial interests and demographics, on third-party platforms. For more information, including how to opt out of interest-based advertising, please see our [Cookie Notice](#).
- **Corporate Transaction:** We may transfer any information we collect in the event we sell or transfer all or a portion of our business or assets (including any shares in the company) or any portion or combination of our products, services, businesses and/or assets. Should such a transaction occur (whether a divestiture, merger, acquisition,

bankruptcy, dissolution, reorganization, liquidation, or similar transaction or proceeding), we will use reasonable efforts to ensure that any transferred information is treated in a manner consistent with this Privacy Notice.

- **Legal Obligations and Rights:** We may disclose personal information to third parties, such as legal advisors and law enforcement:
 - in connection with the establishment, exercise, or defense of legal claims;
 - to comply with laws or to respond to lawful requests and legal process;
 - to protect our rights and property and the rights and property of others, including to enforce our agreements and policies;
 - to detect, suppress, or prevent fraud;
 - to protect the health and safety of us and others; or
 - as otherwise required by applicable law.
- **With Your Consent:** We may disclose personal information about an individual to certain other third parties or publicly with their consent or direction. For example, with an individual’s consent or direction we may post their testimonial on our website or service-related publications.

4. CONTROL OVER YOUR INFORMATION

- **Email Communications.** From time to time, we may send you emails regarding updates to our Services, products or services, notices about our organization, or information about products/services we offer (or promotional offers from third parties) that we think may be of interest to you. If you wish to unsubscribe from such emails, simply click the “unsubscribe link” provided at the bottom of the email communication. Note that you cannot unsubscribe from certain services-related email communications (e.g., account verification, confirmations of transactions, technical or legal notices).
- **SMS Text Messaging.** We may use personal information we collect to communicate with individuals via text message and telephone calls (if required, for example, to notify individuals they have won a competition), including to market to you (with your consent, as may be required by applicable law) or offer you information and updates on products or services we think you may be interested in. You can unsubscribe from marketing text messages at any time by replying STOP or clicking the unsubscribe link (where available) in one of our messages. For more information, please see our [Terms of Service](#).
- **Modifying Account Information.** If you have an online account with us, you have the ability to modify certain information in your account (e.g., your contact information) through the “profile”, “account”, or similar options provided on the Services. Not all personal information is maintained in a format that you can access or change. If you would like to request access to, or correction or deletion of personal information, you may send your request to us at the email provided below. We will review your request, and may require you to provide additional information to identify yourself, but we do not promise that we will be able to satisfy your request.
- **Access to Your Device Information.** You may control the access to your device information through your “Settings” app on your device. For instance, you can withdraw permission for the Services to access your geolocation.
- **How to Control Push Notifications.** You can stop receiving push notifications from us by changing your preferences in the iOS or Android notifications settings menu.

5. CHILDREN

Our Services are not directed to, and we do not intend to, or knowingly, collect or solicit personal information from children under the age of 16. If an individual is under the age of 16, they should not use our Services or otherwise provide us with any personal information either directly or by other means. If a child under the age of 16 has provided personal information to us, we encourage the child’s parent or guardian to contact us to request that we remove the personal

information from our systems. If we learn that any personal information we collect has been provided by a child under the age of 16, we will promptly delete that personal information.

6. THIRD PARTY WEBSITES AND SERVICES

The Services may contain integrations or links to third party websites or services, including those of our business partners. By interacting with these third parties, you are providing information directly to the third party and not Campari. Please note that Campari is not responsible for the privacy practices of these third parties or any entity that it does not own or control. We encourage you to review the privacy policies and online terms of those third parties to learn more about how they handle your personal information.

7. CHANGES TO PRIVACY NOTICE

We reserve the right to change this Privacy Notice from time to time in our sole discretion. We will notify you about material changes in the way we process personal data by sending a notice to the primary email address specified in your account, by placing a prominent notice on our Website, or through other appropriate communication channels. It is your responsibility to review this Privacy Notice periodically. All changes shall be effective from the date of publication unless otherwise provided.

8. CONTACT US

If you have any questions or requests in connection with this Privacy Notice or other privacy-related matters, please send an email to gdpd.office@campari.com

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ADDITIONAL NOTICE FOR CALIFORNIA RESIDENTS

This Additional Notice for California Residents (“**CA Disclosures**”) supplements the information contained in our [Privacy Notice](#) and apply solely to individual residents of the State of California (“**consumers**” or “**you**”).

These CA Disclosures provide additional information about how we collect, use, disclose and otherwise process personal information of individual residents of the State of California, either online or offline, within the scope of the California Consumer Privacy Act of 2018 (“**CCPA**”).

Unless otherwise expressly stated, all terms in these CA Disclosures have the same meaning as defined in our [Privacy Notice](#) or as otherwise defined in the CCPA.

When we use the term “**personal information**” in this CA Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

COLLECTION AND USE OF PERSONAL INFORMATION

We collect personal information from and about you for a variety of purposes, as described in the [How We Collect Your Personal Information](#) and [How We Use Your Personal Information](#) sections of the [Privacy Notice](#).

In the last 12 months, we have collected the following categories of personal information:

- **Identifiers**, such as your first, middle and last name, email address, username, postal address, date of birth or age, postal address, or other similar identifiers;
- **Commercial Information**, such as records of services purchased, obtained or considered;
- **Internet/Network Information**, such as device information, logs and analytics data;
- **Geolocation Data**, such as approximate location data generated based on your IP address or other information;

- **Sensory Information**, such as recordings (with your permission, as applicable) of any phone calls between you and Campari Group;
- **Inferences** about your interests and preferences, generated from your use of our sites; and
- **Other Personal Information**, including information you submit into the feedback form and any communications between you and Campari Group, as well as information we receive from social networking sites.

We collect this information from the following sources: directly from you, from our business partners and affiliates, from your browser or device when you visit our App or use our Services, or from third parties that you permit to share information with us. Please see the [How We Collect Your Personal Information](#) section of the Privacy Notice for more information about the sources of personal information we collect.

1. DISCLOSURE OF PERSONAL INFORMATION

We share personal information with third parties for business purposes. The categories of third parties to whom we disclose your personal information for a business purpose include: (i) other brands and affiliates in our family of companies; (ii) our service providers and advisors; (iii) analytics providers; (vii) marketing and strategic partners; and (viii) social networks.

In the previous 12 months, we have disclosed all of the categories of personal information we collect, explained in the [Collection and Use of Personal Information](#) section of these CA Disclosures, to third parties for a business purpose.

2. SALE OF PERSONAL INFORMATION

Unless you have exercised your Right to Opt-Out of Personal Information Sales, we may sell personal information to third parties for monetary or other valuable consideration. The third parties may use such information for their own purposes in accordance with their own privacy statements, which may include reselling this information to additional third parties. These third parties may include:

- **Business Partners:** We may share your personal information, including Identifiers and Internet/Network Information, with our business partners for business or commercial purposes, including to promote their products or services. We may also share your personal information with other third parties who may have products or services we think you may enjoy.
- **Third-Party Advertising Networks, Social Media Companies and other Third-Party Businesses:** As is common practice among companies that operate online, we allow certain third-party advertising networks, social media companies and other third-party businesses to collect and disclose your personal information (including Internet / Network Information, Commercial Information, and Inferences) directly from your browser or device through cookies or tracking technologies when you visit or interact with our websites, use our apps or otherwise engage with us. These third parties use your personal information for purposes of analyzing and optimizing our Service and advertisements on our websites, on other websites or mobile apps, or on other devices you may use, or to personalize content and perform other advertising-related services such as reporting, attribution, analytics and market research. These third-party businesses may use such information for their own purposes in accordance with their own privacy statements, and may sell the information to third parties, including other advertising networks, for advertising and other purposes.

3. YOUR CALIFORNIA PRIVACY RIGHTS

As a California resident, you may be able to exercise the following rights in relation to the personal information that we have collected about you (subject to certain limitations at law):

| | |
|--|--|
| <p>The Right to Access/Know</p> | <p>You have the right to request any or all of the following information relating to your personal information we have collected and disclosed in the last 12 months, upon verification of your identity:</p> <ul style="list-style-type: none"> • The specific pieces of personal information we have collected about you; • The categories of personal information we have collected about you; • The categories of sources of the personal information; • The categories of personal information that we have disclosed to third parties for a business purpose, and the categories of recipients to whom this information was disclosed; • The categories of personal information we have sold about you (if any), and the categories of third parties to whom the information was sold; and • The business or commercial purposes for collecting or, if applicable, selling the personal information. |
| <p>The Right to Request Deletion</p> | <p>You have the right to request the deletion of personal information we have collected from you, subject to certain exceptions.</p> |
| <p>The Right to Opt Out of Personal Information Sales</p> | <p>You have the right to direct us not to sell personal information we have collected about you to third parties now or in the future.</p> <p>If you are under the age of 16, you have the right to opt in, or to have a parent or guardian opt in on your behalf, to such sales.</p> |
| <p>The Right to Non-Discrimination</p> | <p>You have the right not to receive discriminatory treatment for exercising these rights. However, please note that if the exercise of these rights limits our ability to process personal information (such as in the case of a deletion request), we may no longer be able to provide you our products and services or engage with you in the same manner.</p> |
| <p>“Shine the Light”</p> | <p>California residents that have an established business relationship with us have rights to know how their information is disclosed to third parties for their direct marketing purposes under California’s “Shine the Light” law (Civ. Code §1798.83).</p> |

4. HOW TO EXERCISE YOUR CALIFORNIA PRIVACY RIGHTS

To Exercise Your Right to Know or Right to Deletion

To exercise your Right to Access, Right to Know or your Right to Deletion, please submit a request by:

- Emailing us at gdp.office@campari.com with the subject line, "California Rights Request";
- Filling out our [Privacy Rights Requests Form](#);

Before processing your request, we will need to verify your identity and confirm you are a resident of the State of California. In order to verify your identity, we will generally either require the successful authentication of your account, or the matching of sufficient information you provide us to the information we maintain about you in our systems. This process may require us to request additional personal information from you, including, but not limited to, your email address, phone number, and/or date of last transaction on our Services.

In certain circumstances, we may decline a request to exercise the rights described above, particularly where we are unable to verify your identity or locate your information in our systems. If we are unable to comply with all or a portion of your request, we will explain the reasons for declining to comply with the request.

To Exercise Your Right to Opt-Out of Personal Information Sales

Unless you have exercised your Right to Opt-Out of Personal Information Sales, we may sell personal information to third parties for monetary or other valuable consideration. The third parties may use such information for their own purposes in accordance with their own privacy statements, which may include reselling this information to additional third parties.

You do not need to create an account with us to exercise your Right to Opt-Out of Personal Information Sales. However, we may ask you to provide additional personal information so that we can properly identify you in our dataset and to track compliance with your opt out request. This information may include, but not be limited to, your name, email, and postal code. We will only use personal information provided in an opt out request to review and comply with the request. If you chose not to provide this information, we may only be able to process your request to the extent we are able to identify you in our data systems.

- **Cookies Opt-Out (Do Not Sell My Personal Information):** To exercise your right to opt-out as it relates to the use of cookies and other tracking technologies for analytics and targeted ads, please enter your choice in the appropriate cookies banner.

You may also opt out by using the [Digital Advertising Alliance \("DAA"\) CCPA Tool](#). The DAA offers the CCPA opt out tool as a centralized place to opt out of the sale of personal information by all DAA participating businesses that are collecting your personal information across multiple websites and apps. To exercise your right to opt out from sales of this type of personal information, please visit <https://optout.privacyrights.info>. To make opt-out requests related to mobile apps on your device, you can download the appropriate app at <https://www.privacyrights.info/appchoices>. To learn more about how third parties collect information automatically on our Site and the choices you may have in relation to those activities, please see our [Cookie Notice](#).

- **Opt-Out of Selling or Sharing of Personal Information:** To exercise your opt-out right as it relates to the selling or sharing of your personal information (such as your name, e-mail address, postal address) with third

parties for their direct marketing or other commercial purposes, please submit a request using our [Privacy Rights Requests Form](#).

Authorized Agents

In certain circumstances, California residents are permitted to use an authorized agent to submit requests to know or delete personal information on their behalf through the designated methods set forth in these CA Disclosures, where we can verify the authorized agent's authority to act on their behalf by:

- receiving a power of attorney valid under the laws of California from the consumer or their authorized agent; or
- receiving sufficient evidence to show that the consumer has:
 - provided the authorized agent signed permission to act on their behalf;
 - verified the consumer's own identity directly with us pursuant to the procedures set forth in these CA Disclosures; or directly confirmed with us that the consumer provided the authorized agent permission to submit the request on their behalf.

For requests to opt-out of personal information "sales", we require a signed permission demonstrating your authorized agent has been authorized by you to act on your behalf.

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ADDITIONAL NOTICE FOR THE EUROPEAN ECONOMIC AREA, UNITED KINGDOM, AND SWITZERLAND

This Additional Notice supplements the information contained in our Privacy Notice and apply to individuals who reside in European Economic Area ("**EEA**"), United Kingdom ("**UK**") and Switzerland, even temporarily. This Additional Notice provide information about how we collect, use, disclose and otherwise process personal data, either online or offline, within the scope of the General Data Protection Regulation (EU) 2016/679 ("**GDPR**"), UK GDPR and Switzerland data protection legislation. Unless otherwise expressly stated, all terms in this note have the same meaning as defined in our Privacy Notice or as otherwise defined in the aforementioned legislations.

Campari Group maintains operations in Europe and may direct our services to individuals located in the **EEA, UK** and Switzerland, including through our European websites (collectively, our "**European Services**"). The following disclosures ("**Privacy Disclosures**") apply to our processing of personal data in connection with our European Services.

When we use the term "**personal data**" in this section, we mean information relating to an identified or identifiable natural person.

The Data Protection Officer can be reached at: gdpd.office@campari.com

1. PERSONAL DATA WE COLLECT FROM YOU WHEN YOU USE THE CAMPARI GROUP EUROPEAN SERVICES, AND HOW WE USE IT

We collect the categories of personal data that you voluntarily submit directly to us when you use the European Services, as set forth in our Privacy Notice under the sections entitled [How We Collect Your Personal Information](#) and [How We Use Your Personal Information](#).

We will indicate to you if the provision of certain personal information is mandatory or optional. If you choose not to provide any personal information marked as mandatory, we may not be able to respond to your queries or provide other services to you.

The table at [Annex 1](#) sets out in detail the categories of personal data we collect about you and how we use that information when you use the European Services, as well as the legal basis which we rely on to process the personal information and recipients of that personal information.

2. INFORMATION WE COLLECT ABOUT YOU AUTOMATICALLY

We also automatically collect personal information indirectly about how you access and use the European Services, and information about the device you use to access the European Services. For example, we may collect:

- (a) information about the features you use and the pages you view on the European Services;
- (b) information about your device (such as your IP address, device identifier, device type, model and manufacturer); and
- (c) information about your usage patterns (such as how often you use the Campari Group European Services and your language settings).

We use this information to provide you the features and functionality of the European Services, to monitor and improve the European Services and to develop new services.

The table at [Annex 2](#) sets out further information about the categories of personal information we collect about you automatically and how we use that information. The table also lists the legal basis which we rely on to process the personal information and recipients of that personal information.

We may link or combine the personal information we collect about you and the information we collect automatically.

We may anonymise and aggregate any of the personal information we collect (so that it does not directly identify you). We may use anonymised information for purposes that include testing our IT systems, research, data analysis, improving the European Services. We may also share such anonymised and aggregated information with others.

3. HOW LONG WILL WE STORE YOUR PERSONAL INFORMATION

[Annexes 1](#) and [2](#) set out how long we store your personal information. We will usually store the personal information we collect about you for no longer than necessary for the purposes, as set out in accordance with our legal obligations and legitimate business interests.

The criteria used to determine the period for which personal information about you will be retained varies depending on the legal basis under which we process the personal information:

- (a) **Legitimate Interests.** Where we are processing personal information based on our legitimate interests, we generally will retain such information for a reasonable period of time based on the particular interest, taking into account the fundamental interests and the rights and freedoms of data subjects.
- (b) **Consent.** Where we are processing personal information based on your consent, we generally will retain the information until you withdraw your consent, or otherwise for the period of time necessary to fulfil the underlying agreement with you or provide you with the applicable service for which we process that personal information.
- (c) **Contract.** Where we are processing personal information based on contract, we generally will retain the information for the duration of the contract plus some additional limited period of time that represents the statute of limitations for legal claims that could arise from the contractual relationship.
- (d) **Legal Obligation.** Where we are processing personal information based on a legal obligation, we generally will retain the information for the period of time necessary to fulfil the legal obligation.
- (e) **Legal Claim.** We may need to apply a “legal hold” that retains information beyond our typical retention period where we face threat of legal claim. In that case, we will retain the information until the hold is removed, which typically means the claim or threat of claim has been resolved.

In all cases, in addition to the purposes and legal bases, we consider the amount, nature and sensitivity of the personal information, as well as the potential risk of harm from unauthorized use or disclosure of your personal information.

Upon withdrawal of consent or upon expiry of the storage period for the data collected for the purposes referred to in Annex 1 and 2, whichever is the earlier, the data will be automatically deleted or permanently anonymized.

4. RECIPIENTS OF PERSONAL INFORMATION

In addition to the recipients listed in [Annexes 1](#) and [2](#), we may also share your personal information with the following (as required in accordance with the uses set out in [Annexes 1](#) and [2](#)):

- (a) **Service providers and advisors:** we may share your personal information with third party vendors and other service providers that perform services for us or on our behalf, which may include providing professional services, such as legal and accounting services, mailing, email or chat services, fraud prevention, web hosting, or providing analytic services.
- (b) **Affiliates.** Other companies owned by or under common ownership as Campari Group, including our subsidiaries (i.e., any organisation we own or control) and our ultimate holding company (i.e., any organisation that owns or controls us) and any subsidiaries it owns. These companies will use your personal information in the same way as we can under these Privacy Disclosures, and will implement, where required, an intracompany Data Protection Agreement.
- (c) **Purchasers and third parties in connection with a business transaction:** your personal information may be disclosed to third parties in connection with a transaction, such as a merger, sale of assets or shares, reorganisation, financing, change of control or acquisition of all or a portion of our business.
- (d) **Law enforcement, regulators and other parties for legal reasons:** we may share your personal information with third parties as required by law or if we reasonably believe that such action is necessary to (i) comply with the law and the reasonable requests of law enforcement; (ii) detect and investigate illegal activities and breaches of agreements, including our Terms; and/or (iii) exercise or protect the rights, property, or personal safety of Campari Group, its users or others.

5. MARKETING AND ADVERTISING

From time to time we may contact you with information about our services, including sending you marketing messages and asking for your feedback on our Services. Most marketing messages we send will be by email. For some marketing messages, we may use personal information we collect about you to help us determine the most relevant marketing information to share with you.

We may send you marketing messages if you have given us your consent to do so or where we have relied on the soft opt-in rule (where applicable). If you wish to unsubscribe from such emails, simply click the “unsubscribe link” provided at the bottom of the email communication.

6. STORING AND TRANSFERRING YOUR PERSONAL INFORMATION

Security. We implement appropriate technical and organizational measures to protect your personal information against accidental or unlawful destruction, loss, change or damage. All personal information we collect will be stored by our cloud hosting provider on secure servers. We will never send you unsolicited emails or contact you by phone requesting credit or debit card information or national identification numbers.

International Transfers of your Personal Information. The personal information we collect may be transferred to and stored in countries outside of the jurisdiction you are in where we and our third-party service providers have operations. If you are located in the EEA, United Kingdom or Switzerland, your personal information may be processed outside of those regions, including in the United States.

In the event of such a transfer, we ensure that: (i) the personal information is transferred to countries recognized as offering an equivalent level of protection; or (ii) the transfer is made pursuant to appropriate safeguards, such as standard contractual clauses adopted by the European Commission (including additional safeguards as recommended by the European data Protection Board).

If you wish to enquire further about these safeguards used, please contact us using the details set out at the end of these Privacy Disclosures.

7. PROFILING

We may analyze personal data we have collected about you to create a profile of your interests and preferences so that we can contact you with information that is relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively send product updates. We may also use personal data about you to detect and reduce fraud and credit risk. The entering of personal data in our Customer Relationship Management (CRM) system is optional and occurs only if consent is given to one of the purposes detailed in Annex 1 and 2; it automatically implies that Campari Group employees across the world, tasked with data processing, will be able to view the data, as well as to change and to update it.

8. YOUR RIGHTS IN RESPECT OF YOUR PERSONAL INFORMATION

In accordance with applicable privacy law, you have the following rights in respect of your personal information that we hold:

- (a) **Right of access.** You have the right to obtain:
 - (i) confirmation of whether, and where, we are processing your personal information;
 - (ii) information about the categories of personal information we are processing, the purposes for which we process your personal information and information as to how we determine applicable retention periods;
 - (iii) information about the categories of recipients with whom we may share your personal information; and
 - (iv) a copy of the personal information we hold about you.
- (b) **Right of portability.** You have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal data to another person.
- (c) **Right to rectification.** You have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay.
- (d) **Right to erasure.** You have the right, in some circumstances, to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified.
- (e) **Right to restriction.** You have the right, in some circumstances, to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in this way is not justified, such as where the accuracy of the personal information is contested by you.
- (f) **Right to withdraw consent.** There are certain circumstances where we require your consent to process your personal information. In these instances, and if you have provided consent, you have the right to withdraw your consent. If you withdraw your consent, this will not affect the lawfulness of our use of your personal information before your withdrawal.

You have the right to provide instructions regarding the retention, deletion and disclosure of your personal information after your death. In the absence of instructions from you, it is possible for your heirs to request the disclosure or deletion of your personal information.

You also have the right to object to any processing based on our legitimate interests where there are grounds relating to your particular situation. There may be compelling reasons for continuing to process your personal information, and we will assess and inform you if that is the case. You can object to marketing activities for any reason.

You also have the right to lodge a complaint to your local data protection authority. If you are based in the European Union, information about how to contact your local data protection authority is available [here](#). If you are based in the UK

or Switzerland, your local data protection authorities are the UK Information Commissioner's Office (<https://ico.org.uk/global/contact-us/>) and the Swiss Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact/address.html>).

If you wish to exercise one of these rights, please fill out our [Privacy Rights Requests Form](#).

Due to the confidential nature of data processing we may ask you to provide proof of identity when exercising the above rights. This can be done by providing a scanned copy of a valid identity document or a signed photocopy of a valid identity document.

9. COOKIES AND SIMILAR TECHNOLOGIES USED ON OUR EUROPEAN SERVICES

Our European Services use cookies and similar technologies such as pixels and Local Storage Objects (LSOs) like HTML5 (together “**cookies**”) to distinguish you from other users of our Services. This helps us to provide you with a good experience when you browse our Services and also allows us to monitor and analyse how you use and interact with our Services so that we can continue to improve our Services. It also helps us and our partners to determine products and services that may be of interest to you. Please see our [Cookie Notice](#) for more information about these practices and your choices regarding cookies.

10. TRACKING TECHNOLOGIES USED IN OUR EMAILS

Our emails may contain tracking pixels that identify if and when you have opened an email that we have sent you, how many times you have read it and whether you have clicked on any links in that email. This helps us measure the effectiveness of our marketing email campaigns, make the emails we send to you more relevant to your interests and to understand if you have opened and read any important administrative emails we might send you.

Most popular email clients will allow you to block these pixels by disabling certain external images in emails. You can do this through the settings on your email client – these generally give you the option of choosing whether emails will display "remote images", "remote content" or "images" by default.

Some browsers also give you the option of downloading and installing extensions that block pixels and other tracking technologies.

11. PROCESSING METHOD

Personal data will be processed with IT-based tools and/or processed manually for the length of time needed to achieve the purpose for which it was collected. In particular, personal data collected for the purposes outline in **Annex 1** and **2** will be also processed with the usage of automated mechanisms based on procedures and logics that are strictly related to the purposes specified.

ANNEX 1 – PERSONAL INFORMATION YOU PROVIDE TO US

| Category of Data | Purpose of the Processing | Legal Basis for Processing | Data Retention | Recipients of Personal Information |
|---|---|--|--|---|
| Legal Drinking Age Verification , which includes your date of birth and country or region. | Verify your age and ability to use the European Services. | The processing is necessary for our legitimate interests, namely administering the European Services, and for the performance of a contract with you, namely our Terms of Service. | The period of time required by the applicable law. | We may share any information you provide to us with third parties who support us in defining marketing campaigns or with providers of hosting or maintenance services for our digital assets. |
| Contact information , such as first name, last name and email address. | We may use this information to set up and authenticate your account on the European Services. | The processing is necessary for the performance of a contract with you and to take steps prior to entering into a contract with you, namely our Terms of Service. | Duration of the account and, after account deletion for a period required by the applicable law. | We may share this information with [e.g., Stripe] in order to identify you so that you can make and receive payments through the European Services. |
| | We may use this information to communicate with you, including sending service-related communications. | The processing is necessary for the performance of a contract with you, namely our Terms of Service. | For the time necessary to process your request or, at maximum, for one year. | |
| | We may use this information to deal with enquiries and complaints made by or about you relating to the European Services. | The processing is necessary for our legitimate interests, namely administering the European Services, and for communicating with you effectively to respond to your queries or complaints. | The period of time required by the applicable law. | |
| | We may use this information in connection with providing you with marketing communications in accordance with your preferences. | We will only use your personal information in this way to the extent you have given us consent to do so. | Until you withdraw consent. | |
| Your account and profile information such as your full name, email, and password. When you update your | We may use this information to create your account on the European Services. | The processing is necessary for the performance of a contract with you. | Duration of the account and, after account deletion for a period required by the applicable law. | We may share any information you provide to us with third parties who support us in defining marketing campaigns or with providers of |

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|---|--|--|---|--|
| profile information, we may also collect your phone number, email address, birthday or date of birth, and your preferences]. | We use this information to deal with enquiries and complaints made by or about you relating to the European Services. | The processing is necessary for our legitimate interests, namely for communicating with our members effectively to respond to any queries or complaints. | The period of time required by the applicable law. | hosting or maintenance services for our digital assets. |
| Reservations. When you make an online reservation with any of our brand houses, we collect information required make your booking, which may include your first name, last name, mobile number, email address, number of guests attending, and any information you provide in the comments section (e.g. preferences, special requests). | We may use this information to process your orders through the European Services. | The processing is necessary for the performance of a contract. | For the time necessary to comply with applicable laws. | We may share this information with third parties who support us in defining marketing campaigns or with providers of hosting or maintenance services for our digital assets. |
| | We may use this information to improve the European Services. | The processing is necessary for our legitimate interests (to develop and improve our service). | At maximum for one year. | |
| Payment transaction information. When you subscribe to our services, we may collect information such as your billing address and other information such as date and time of your transaction. | We may use this information to process your orders through the European Services. | The processing is necessary for the performance of a contract. | For the time necessary to comply with applicable financial laws. | We may share any information you provide to us with third parties providing us payment services. |
| | We may use this information to verify your identity in connection with the detection and prevention of fraud or financial crime. | The processing is necessary for our and third parties' legitimate interests, namely the detection and prevention of fraud and financial crime. | At maximum for one year. | |
| Newsletter and marketing emails. If you sign up to receive news or alerts from us, or join our wait list, we | We may use this information to present to you promotional and commercial communications relating to the services/products offered by the Controller. | We will only use your personal information in this way to the extent you have given us consent to do so. | Until you withdraw your consent, and subject to shorter periods as may be required in your particular jurisdiction. | We may share this information with third parties who support us in defining marketing campaigns or with providers of hosting or maintenance services for our digital assets. |

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| <p>may collect your email and applicable interests and communication preferences.</p> | <p>We may use this information to localise features of the European Services.</p> | <p>The processing is necessary for our legitimate interest, namely localising features of the European Services and tailoring the European Services so that it is more relevant to our users.</p> | <p>Retention period depends on the cookie installed (see cookie policy of the website/app).</p> | |
| | <p>We may use this information to determine content that may be of interest to you.</p> | <p>The processing is necessary for our legitimate interests, namely tailoring the European Services so that it is more relevant to you.</p> | <p>Retention period depends on the cookie installed (see cookie policy of the website/app).</p> | |
| <p>Chat, comments and opinions. When you contact us directly, e.g. by email or phone we will record your comments and opinions.</p> | <p>We may use this information to address your questions, issues and concerns.</p> | <p>The processing is necessary for our legitimate interests, namely communicating with you and responding to queries, complaints and concerns.</p> | <p>At maximum for one year.</p> | <p>We may share any information you provide to us when you contact us with third parties who support us in defining marketing campaigns or with providers of hosting or maintenance services for our digital assets.</p> |
| | <p>We may use this information to improve the European Services.</p> | <p>The processing is necessary for our legitimate interests (to develop and improve our service).</p> | <p>At maximum for one year.</p> | |
| <p>Information received from third parties, such as social networks. If you interact with us through a social network, we may receive information from the social network such as your name, profile information, and any other information you permit the social network to share with third parties. The data we receive is dependent on your privacy settings with the social network.</p> | <p>We may use this information to reshare content created through the use of the European Services</p> | <p>The processing is necessary for our legitimate interests (to develop our service and inform our marketing strategy)</p> | <p>At maximum for one year.</p> | |

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| <p>Your preferences, such as preferences set for notifications, marketing communications, how the European Services is displayed and the active functionalities on the European Services.</p> | <p>We use this information to provide notifications, send news, alerts and marketing communications and provide the European Services in accordance with your choices.</p> | <p>The processing is necessary for our legitimate interest, namely ensuring the user receives the correct marketing and other communications, and that this is displayed in accordance with the user's preferences.</p> | <p>At maximum for one year.</p> | <p>We may also share your personal information with third parties who support us in defining marketing campaigns or with providers of hosting or maintenance services for our digital assets.</p> |
| | <p>We use this information to ensure that we comply with our legal obligation to send only those marketing communications to which you have consented.</p> | <p>The processing is necessary for compliance with a legal obligation to which we are subject.</p> | <p>At maximum for one year.</p> | |

ANNEX 2 – PERSONAL INFORMATION COLLECTED AUTOMATICALLY

| Category of Data | Purpose of the Processing | Legal Basis for the Processing | Data Retention | Recipients of Personal Data |
|--|--|--|---|--|
| <p>Approximate location information. Other than information you choose to provide to us, we do not collect information about your precise location. Your device's IP address may however help us determine an approximate location.</p> | <p>We may use information you provide to us about your location to monitor and detect fraud or suspicious activity in relation to your account.</p> | <p>The processing is necessary for our legitimate interests, namely to protect our business and your account from fraud and other illegal activities.</p> | <p>At maximum for one year.</p> | <p>We may share this information with the following with third parties who support us in defining marketing campaigns or with providers of hosting or maintenance services for our digital assets, such as:</p> <ul style="list-style-type: none"> • e.g. Google which provide our analytics platforms, in order to help us understand how visitors use our websites] • e.g. Facebook, Inc. which to helps us understand how visitors use our websites, and allows for direct marketing. |
| | <p>We may use this information to tailor how the European Services is displayed to you (such as the language in which it is provided to you).</p> | <p>The processing is necessary for our legitimate interest, namely tailoring our service so that it is more relevant to our users.</p> | <p>At maximum for one year.</p> | |
| <p>Information about how you access and use the European Services. For example, how frequently you access the European Services, the time you access the European Services and how long you use it for, the approximate location that you access the European Services from, the site from which you came and the site to which you are going when you leave our website, the website</p> | <p>We may use information about how you use and connect to the European Services to present the European Services to you on your device.</p> | <p>The processing is necessary for our legitimate interests, namely to tailor the European Services to the user.</p> | <p>Retention period depends on the cookie installed (see cookie policy of the website/app).</p> | |
| | <p>We may use this information to determine products and services that may be of interest to you for marketing purposes.</p> | <p>The processing is necessary for our legitimate interests, namely to inform our direct marketing.</p> | <p>Retention period depends on the cookie installed (see cookie policy of the website/app).</p> | |
| | <p>We may use this information to monitor and improve the European Services and business, resolve issues and to inform the development of new products and services.</p> | <p>The processing is necessary for our legitimate interests, namely to monitor and resolve issues with the European Services and to improve the European Services generally.</p> | <p>Retention period depends on the cookie installed (see cookie policy of the website/app).</p> | |

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| <p>pages you visit, the links you click, whether you open emails or click the links contained in emails, whether you access the European Services from multiple devices, and other actions you take on the European Services.</p> | | | | |
| <p>Log files and information about your device. We also collect information about the tablet, smartphone or other electronic device you use to connect to the European Services. This information can include details about the type of device, unique device identifying numbers, operating systems, browsers and applications connected to the European Services through the device, your mobile network, your IP address and your device's telephone number (if it has one).</p> | <p>We may use information about how you use and connect to the European Services to present the European Services to you on your device.</p> | <p>The processing is necessary for our legitimate interests, namely to tailor the European Services to the user.</p> | <p>At maximum for one year.</p> | |
| | <p>We may use this information to monitor and improve the European Services and business, resolve issues and to inform the development of new products and services.</p> | <p>The processing is necessary for our legitimate interests, namely to monitor and resolve issues with the European Services and to improve the European Services generally.</p> | <p>At maximum for one year.</p> | |