

## MOET HENNESSY (ASIA PACIFIC) PRIVACY POLICY

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Confidentiality and security of your personal data are important to us. We would like to offer you personalized services while respecting your privacy and choices.

This Privacy Policy is provided by Jas Hennessy (Far East) Limited (hereinafter, “Company”) whose registered office is at 30<sup>th</sup> Floor, PCCW Tower, 979 King’s Road, Quarry Bay, Island East, Hong Kong.

### **Purpose of this Privacy Policy**

This Privacy Policy aims to give you information on how we collect and process your personal data through your use of our websites, including any data you may provide through our websites when you sign up to any of our marketing promotions or events, submit a contact request, or use any of the e-commerce platforms managed by us.

This Privacy Policy also applies when you purchase products and services from us, such as a vineyard tour or a wine testing seminar.

It is important that you read this Privacy Policy together with any other Privacy policy we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we use your personal data. This Privacy Policy supplements the other policies and is not intended to override them.

Our websites and the platforms are not intended for children and we do not knowingly collect data relating to children.

### ***Controller***

The Company operates trade and distribution business in Asia through different legal entities, details of which can be found here: [privacy-policy-ap.moethennessy.com/MHAP\\_PPE\\_List.pdf](https://privacy-policy-ap.moethennessy.com/MHAP_PPE_List.pdf). This Privacy Policy is issued on behalf of Moet Hennessy Group of companies in Asia. When we mention "we", "us" or "our" in this Privacy Policy, we are referring to the relevant legal entity in the Moet Hennessy Group of companies in Asia responsible for processing your data.

We have appointed a Data Privacy Officer who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights under the applicable privacy laws, please feel free to contact us using the details set out below.

Our Data Privacy Officer's business contact details:

- Legal entity: JAS Hennessy (Far East) Limited
- Attention: Data Privacy Officer
- Email: DPO.AP@moethennessy.com
- Postal address: 30/F, PCCW Tower, 979 King's Road, Quarry Bay, Hong Kong

You have the right to make an inquiry or complaint at any time to the respective data protection regulator for any data protection issues that are of your concern. However, we would appreciate the opportunity to deal with your concerns before you approach the national regulatory authority so please contact us in the first instance.

## **1. WHAT PERSONAL DATA DO WE COLLECT**

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"Personal data" means any information that could identify you either directly (e.g. your full name) or indirectly (e.g. through an unique client ID number).

The personal data we collect depends upon the touchpoint of our interaction, and is also limited to that which is relevant and appropriate for the interaction. Website visitors who browse our websites and view our products and marketing information can choose to do so without identifying themselves, and the same applies to in-store and social media browsing. Unless you choose to interact with us via those touchpoints, signing up for one of our programs or events, or posting a comment or a like online, our data collection is limited to the use of Cookies for website visitors. Please refer our Cookies Policy for information on how we manage Cookies.

For customers and other individuals who sign up for programs or events, we must collect certain relevant information from you. The information we collect is related to the particular transaction as well as our overall relationship with you. For example, if you place an order for a product or service, such as a wine tasting course or a vineyard tour, we must collect information to process (and, if relevant, fulfill and process) your order. For customers and other individuals who sign up for our programs or events, we generally collect your contact details, contact preferences, and information that will allow us to make recommendations about our products or services that may be of interest to you.

Depending on the data you provide or share with us, personal data may include information related to:

- your identity, your date of birth, and your contact details, such as phone number, email and address, and your passport details;
- the identity and date of birth of your family members and their contact details, such as phone number, email and address and passport details;
- your products and food preferences;
- your interests;

- your purchases and any returns or exchanges;
- your online journeys (our websites and the relevant social media pages);
- your requests through our customer department or our public relations department; or
- the Company events you attend.

We invite you to keep us regularly informed in writing of any change in your contact details.

## **2. HOW DO WE COLLECT OR RECEIVE YOUR PERSONAL DATA**

As part of our relationship with you, we may collect certain data via the followings:

- Company's and Maison's websites;
- in-store through our salesperson or distribution channel salesperson;
- Company's events you attend;
- public relations relationship;
- contact with our customer service department;
- forms you complete (in store or online);
- digital apps you use;
- Moët Hennessy social media pages you visit or comment/like;
- digital media advertisements you click on; or
- search engines paid advertisements you click on.

You will be informed about what information is mandatory. Such data will be identified by an asterisk or other clear indication on the relevant document on which you will provide your personal data. If these fields are not completed, we are unable to address your query and/or to provide the services requested.

## **3. HOW DO WE USE YOUR PERSONAL DATA**

We will use your personal data to:

- provide the products and services you have ordered, process payments, communicate with you about your orders and generally to maintain your accounts with us; and
- to manage our relationship with you, to provide and personalize our service and communications, including for customer segmentation and profiling, for marketing and communication initiatives and to conduct marketing research, statistical and trend analysis;

In addition to the purposes noted above, we will use your email address to send you updates, news and other special offers relating to our products and services that we think may be of interest to

you. We will not use or share your personal data for such direct marketing purposes unless we have received your consent.

In addition, we may disclose your personal data:

- to the extent that we are required to do so by law;
- in order to establish, exercise or defend our legal rights; and
- to the purchaser, or prospective purchaser of any business or asset which we are, or are contemplating selling.

#### **4. FOR HOW LONG WE MAY KEEP YOUR PERSONAL DATA**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. When we no longer need to use your personal data, it is removed from our systems and records or anonymized so that you can no longer be identified from it.

#### **5. HOW DO WE PROTECT YOUR PERSONAL DATA**

We have adopted reasonable and appropriate precautions that are designed to protect your data from loss, misuse, alteration, destruction or access by unauthorized third parties. We also require by our partners and group companies to uphold a similar level of protection for your data. The measures are evaluated and updated to address new threats and challenges, as well as new legal requirements in the countries where we operate.

#### **6. WHAT ABOUT TRANSFER TO THIRD PARTIES**

Because the Company operates in many countries across Asia, we may disclose your personal data to other Moët Hennessy group of companies and any of our employees, officers, agents, trusted suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Privacy Policy (see 'How do we use your personal data').

You should know that the data protection and security requirements differ from country to country, and may not offer the same level of protection as those in your home country. Nevertheless, we and our group companies have taken steps to ensure an adequate level of protection of your data irrespective of where it is located, such as by using data transfer methods approved by the European Commission (where the data protection laws are considered to be the strongest worldwide). We also require our third-party partners to fulfill applicable data transfer obligations in relation to the personal data that they receive on our behalf. You may request us not to transfer

your personal data to an off-shore country, but by doing so we may not be able to provide the products or services you have requested from us.

## **7. WHAT INFORMATION CAN I ACCESS**

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Subject to various exceptions and in accordance with data protection legislation in the country where you reside, you have the right to access certain personal data held about you and correct any inaccuracies. We may charge a reasonable fee for the processing of any Data Subject Access Request in accordance with data protection legislation in your country. You also have the right to raise a complaint about our processing with the data protection regulator in your jurisdiction.

Please send your email to [DPO.AP@moethennessy.com](mailto:DPO.AP@moethennessy.com), or write to us at Jas Hennessy (Far East) Limited, whose registered office is at 30/F, PCCW Tower, Taikoo Place, 979 Kings Road, Quarry Bay, Island East, Hong Kong if you would like to access your personal data.

## **8. RIGHT TO OPT OUT OF DIRECT MARKETING**

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You have the right to ask us not to process your Personal Data for direct marketing purposes. You can exercise your right to prevent such processing by indicating that you do not consent to direct marketing at the point at which we collect your Personal Data. You can also exercise the right at any time after we have collected and used your Personal data for direct marketing purposes by:

- following the opt-out instructions contained in the relevant communications; or
- send your opt-out request by email to [DPO.AP@moethennessy.com](mailto:DPO.AP@moethennessy.com)

*This Privacy Policy is written in English language and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this policy, the English version shall prevail.*

*These Terms and Conditions were last updated on 1<sup>st</sup> October, 2019.*