

CAMPARI GROUP

CAMPARI GROUP INFO - WEBSITE PRIVACY NOTICE

This privacy notice contains important information on the processing of your personal data processed by us through our website www.camparigroup.info (the "Site"), as data controller, pursuant to Article 13 of Regulation (EU) 2016/679 (the General Data Protection Regulation, the "GDPR").

Who is the data controller of your personal data?



The data controller of your personal data Davide Campari-Milano N.V. ("**Data Controller**", "**Campari**", "**we**" or "**our**") with official seat in Amsterdam (the Netherlands) and registered office in Sesto San Giovanni, Via Franco Sacchetti 20, 20099, Italy and tax code and VAT number 06672120158.

What are the contacts of the Data Protection Officer (DPO)?



The Data Controller has appointed a Data Protection Officer that can be contacted at the following e-mail address: gdpd.office@campari.com.

What personal data may we process about you?



For the purposes set out in this notice, the Data Controller will process:

a) **Browsing data and information collected with cookies**

The computer systems and software procedures used to run the Site may, during their standard functioning, obtain certain personal data whose transmission is implicit in the use of Internet communication protocols. This data, by its very nature, could, through processing and association with data also held by third parties, allow users' identification. This category of data includes IP addresses or the type of device used by users who connect to the Site, the settings and characteristics of their device and the related system activity, the URI (*Uniform Resource Identifier*) addresses of the requested resources, the request time, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and IT environment.

With regard to personal data collected via cookies, this Site **only uses technical cookies**. These cookies are necessary for the Site's operation and cannot be disabled on our systems. They are usually set only in response to your actions on the Site corresponding to a service request. You can set your browser to block or receive alerts about these cookies, but some parts of the Site may not work. To know how to set your cookie preferences on your browser, click on the following links:

- [Microsoft Edge](#)
- [Firefox](#)
- [Safari \(on Mac\)](#)
- [Chrome](#)
- [Opera](#)
- [Apple Safari \(iPhone, iPad, or iPod\)](#)

The full details of the cookies in use on the Site can be accessed via the button "Show details" in the banner or can be read in the table at the bottom of this Privacy Notice.

b) **Personal data collected via the age gate**

Via the legal drinking age verification pop-up, we collect data you provide us which includes your date of birth and country of residence.

Why do we process your personal data and what are the legal bases?

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Hereunder the details on what of your personal data will be processed for what purposes and the related legal bases:

- i. **the browsing data and cookies are used and processed to allow you to browse the Site and ensure the proper functioning and visualisation on your device.** The legal basis of the processing is the performance of a contract or pre-contractual measures taken at your request. Providing personal data for this purpose is necessary to enable you to browse the Site. If such personal data were not collected, the transmission of information via the internet could not be properly possible or limited.

With specific reference to the technical cookies in use, if technical cookies are deactivated on your browser, some of the Site's services or features might not be available or function properly.



- ii. **the personal data collected via the age gate is processed to ensure our compliance with legal obligations.** Such processing is necessary because in accordance with legal obligations our services (and consequently our Site) are not directed to children below legal age (in relation to each country) in respect of the products, and we do not intend to, or knowingly, collect or solicit personal information from children. The legal basis of the processing is consequently the fact that the processing is necessary for compliance with a legal obligation to which the Data Controller is subject. Providing personal data for this purpose is necessary to allow the Data Controller to fulfil its legal obligations; failure to provide your personal data entails the Data Controller's inability to fulfil its legal obligations and, therefore, we may block your access to the Site.

- iii. **the browsing data and the personal data collected via the age gate may also be processed to exercise or defend our rights, including ascertaining possible liability in the event of potential cybercrimes to the detriment of the Site or third parties, and consequential in court proceedings or out-of-court procedures.** The legal basis of the processing is the legitimate interest of the Data Controller in exercising or defending its rights. The Data Controller has considered that this legitimate interest is not overridden by your interests, fundamental rights and freedoms.

For how long we process and retain your personal data?



We **only** retain personal data for as **long as it is necessary for the purpose for which it was collected or for any other related legitimate purpose**. Therefore, if personal data are processed for different purposes, we will retain those data until the purpose with the longer retention period ceases. In any case, we will no longer process personal data for that purpose whose retention period has expired. Personal data that is no longer needed, or for which there is no longer a legal basis for its retention, will be deleted.

Browsing data is processed for the duration of your session on the Site to allow you to browse the Site and ensure the proper functioning and visualisation on your device and up to maximum one year from the end of the session to ascertain possible liability in the event of potential cybercrimes to the detriment of the Site.

Cookies are used for the duration outlined in the Banner by clicking on the "Show details" button or for the duration outlined in the table at the bottom of this Privacy Notice. The retention period depends on the cookie installed.

The personal data collected via the age gate is processed for the duration of your session on the Site and up to maximum one year from the end of the session, to demonstrate compliance with the legal obligations.

In the event that it is necessary to process data for the purpose of **exercising or defending rights in court proceedings or out-of-court procedures**, the personal data is processed for the entire duration of the proceedings and up to the expiry of time-barring provided for the legal remedies.

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With whom do we share your personal data?



Your personal data will be processed by persons authorised and instructed to process the personal data under the direct authority of Campari (e.g., employees and collaborators as persons authorised to process personal data under the direct authority of the Data Controller).

In addition, your personal data may be communicated, exclusively for the purposes specified above, to the following recipients that will process your personal data as data processors or as autonomous data controllers as below described:

- companies providing website maintenance services and companies providing IT services, such as the company providing the cookie management platform (as data processors);
- companies that provide us with cloud or hosting services (as data processors);
- authorities and institutions (e.g. law enforcement authorities) to which laws or regulations grant the right to access the data (as autonomous data controller).
- legal advisors and lawyers (in connection with establishing, exercising, or defending our legal claims) (as autonomous data controllers).

The list of recipients to whom your personal data are communicated can be requested from the Data Controller by writing to gdpd.office@campari.com

Is your personal data transferred across the border?



The Data Controller stores personal data on servers located within the European Union. In relation to some hosting providers, your personal data may be transferred to the United States. In such a case the Data Controller only transfers your personal data to companies that adhere to the data privacy framework, in accordance with the EU adequacy decision that recognizes that such companies offer an equivalent level of protection.

In any case, where the Data Controller, due to any requirements related to where service providers are located, needs to transfer data outside the European Union or the European Economic Area to countries for which the European Commission has not issued an Adequacy Decision, the Data Controller undertakes to ensure adequate levels of protection and safeguards together with contractual safeguards, in accordance with applicable laws, including the execution of standard contractual clauses as per Art. 46(2)(c) of the GDPR, supplemented if needed by additional technical, legal, and organizational security measures necessary to ensure that the level of protection of personal data is equivalent to the one of the European Union.

For any further information on the transfer of your personal data, please send an e-mail to the following address: gdpd.office@campari.com

What are your rights on your personal data?



In relation to the processing of your personal data, you can exercise your rights according to the relevant provisions of the GDPR (Articles 15-22), namely:

- receive confirmation of the processing of your personal data (and information on it) and access its content (right of access);
- update, amend, correct or integrate your personal data (right to rectification);
- request the erasure or restriction of personal data processed in breach of the law, including data the retention of which is not necessary for the purposes for which the data were collected or otherwise processed (right to be forgotten and right to restriction of processing);
- object to the processing at any time where the processing is based on our legitimate interest or in case the data are processed for direct marketing (right to object);
- in specific cases, receive a copy of the personal data concerning you, rendered in the context of the contract, in electronic format and request that such data be transmitted to another data controller (right to data portability).

To exercise your rights, you can contact the DPO at the following email address: gdpd.office@campari.com

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What other rights can you exercise regarding your personal data?



If you consider that the processing of your personal data via the website infringes the data protection legislation, you have the right to lodge a complaint with a Supervisory Authority.

How can you keep track of changes to this privacy notice?



For legal and/or organizational reasons, this privacy notice may undergo changes. We suggest, therefore, to check this privacy notice regularly and to refer to the latest version of it. You can find the date of the last update at the bottom of this privacy notice.

Last update to the Privacy Notice: November 2023

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COOKIE LIST

Cookie name	First party / third party cookie	Cookie type	Use and purpose	Cookie duration	Third parties' name	Third parties' privacy notice
incap_ses_#	First Party camparigroup.info	Technical	Preserves users' states across page requests.	Session	N.A.	N.A.
visid_incap_#	First Party camparigroup.info	Technical	Preserves users' states across page requests.	1 year	N.A.	N.A.
CookieConsent	First Party Cookiebot	Technical	Preserves users' states across page requests.	1 year	N.A.	N.A.
hex (32)	First Party camparigroup.info	Technical	Preserves users' states across page requests.	Session	N.A.	N.A.