

# CAMPARI GROUP

## PRIVACY POLICY

Campari Group (the “Company”) respects your right to privacy. This Privacy Policy summarizes what personal information we may collect, and how your personal data will be processed when you access to (the “Website”), located at [www.aperolspritzcaribbean.com](http://www.aperolspritzcaribbean.com) or a mobile application (“App”) managed by Campari Group. It also explains how your personal data is used, shared and how you can contact us in case of any need with regards to your personal data and other important topics relating to your privacy and data protection.

We urge you to carefully read this document fully, so that you are fully informed of how we use the information you provide when using the Website and the App.

It is the Company’s policy to comply with all applicable privacy and data protection laws. This commitment reflects the value we place on earning and keeping the trust of our customers, business partners, and others who share their personal information with us.

This Privacy Policy applies to the Website and/or App. It also applies to personal information we may otherwise collect: (i) through our products and services; (ii) when you interact with us by means other than the Website or App, for example, in person or by telephone; and (iii) from our customers, distributors, suppliers, vendors, and other business partners (collectively “Business Partners”).

The type of personal data processed, and the purposes of the processing may vary depending on the services offered by the Website or App which you interact with. For example, the way your personal data is collected will vary if you are interested in participating in an event proposed by one of our brands or if you request to receive a newsletter.

To the extent required by the applicable laws, whenever the Company collects your personal information, we will:

- Provide you with timely and appropriate notice regarding our data practices through this Privacy Policy;
- collect your personal information only for specified and legitimate purposes. The information we collect will be relevant, adequate, and not excessive for the purposes for which it is collected;
- process your personal information in a manner consistent with the purposes for which it was originally collected or to which you have subsequently consented;
- take commercially reasonable steps to ensure that your personal information is reliable for its intended use, accurate, complete, and, where necessary, kept up-to-date;
- not use your personal information for any direct marketing purposes without first obtaining your consent; You acknowledge that the app is clearly intended as a marketing tool and your continued interest in using the same is additional evidence of the consent already provided for the use of your personal information for direct marketing through the app.
- take appropriate measures, by contract or otherwise, to provide adequate protection for personal information that is disclosed to a third party or transferred to another country, including any transfers within the Company.
- dispose of any personal information we have collected in a manner that complies with applicable privacy laws and regulations.

	<b>DATA CONTROLLER</b>	<p>The company belonging to Campari Group that is responsible for the collection and processing of personal data depends on the country you are connected from and how you interact with our websites and apps. In this privacy policy the relevant Campari Group company is referred to as "Data Controller".</p> <p>Please see the section “local companies” below to check which is the relevant Data Controller.</p>
	<b>DATA PROTECTION OFFICER</b>	The Data Protection Officer can be reached at: <a href="mailto:aperolappcaribbean@campari.com">aperolappcaribbean@campari.com</a>
	<b>CATEGORIES OF PERSONAL DATA</b>	<ul style="list-style-type: none"><li>• Contact details including name, email, telephone number, shipping and billing address.</li><li>• Login and account information, including screen name, password and unique user ID.</li><li>• Other personal details including gender, hometown, date of birth.</li><li>• Payment or credit card information and purchase history.</li><li>• Images, photos and videos.</li><li>• Personal preferences and other information related to you and your personal life.</li><li>• Technical navigation data (e.g. IP address), in accordance with your cookie preferences.</li></ul>
	<b>DATA SOURCE</b>	The data we collect is provided by you in compliance with all applicable privacy statutes and regulations.



### The following are the uses that we may give to the information we collect

**Reply to your information request:** provide you with the information you have requested through a contact form, e.g. when you make general questions like “where can I find a given product?”.

**Newsletters:** send, by e-mail, communications of an informative nature (“Newsletter”) to those who explicitly request it, by entering their e-mail address, name and surname in the appropriate data collection form.

**Competitions/Events:** allow, with regard to the required data indicated as mandatory (\*), the registration to the competition, as well as the management of the organizational activities related to the competition.

**Direct marketing:** with your express and specific consent contact you for commercial and/or promotional purposes, e.g. by sending you - by automated means of contact (such as sms, mms and e-mail) - promotional and commercial communications relating to the services/products offered by the Controller.

**Profiling:** perform analysis of your preferences, habits, behaviours, interests inferred, for example, from online clicks on post/contents of Data Controller’s websites and social pages, in order to send you commercial communications personalized and/or carry out targeted promotional actions.

**Aggregated research:** understand customer behaviour and preferences for aggregated research and analysis. For more information, see below “Understand customer behaviour and preferences”.

**Communication media (subscription):** allow the subscription of the disclaimer for the publication of your photographic images or videos.

**Communication media (usage):** use, in the manner specified in the disclaimer, the video and/or photographic image shooting.

**Optimize our websites/apps:** in order to run our websites/apps we install cookies to optimize the performance and personalize the content.

**Process your order:** in the websites/apps in which you can purchase our products, we collect your data to correctly process the order.

**Evaluate customer’s satisfaction:** we collect your data to evaluate our level of services (e.g. competitions, events, product sales) after an interaction with you.

**Account:** let you create an account on our websites/apps.

**Legal obligation:** fulfilment of obligations to comply with the applicable law (e.g. financial obligations).



### NATURE OF THE PROVISION OF DATA

The data you provide are acquired by us on a voluntary basis and after we have detailed the use to be given to the same. You can refuse to provide said data to us, but if you refuse to provide us with a necessary information to provide a service requested by you, we will be not in the position to provide such service. Some technical information could be automatically collected when you connect with our websites and apps.



## RECIPIENTS OF PERSONAL DATA

The data may be processed by external parties operating as data controllers such as, by way of example, Authorities and supervisory and control bodies and, in general, parties, including private parties, entitled to request the data, Public Authorities that expressly request the Controller for administrative or institutional purposes, in accordance with the provisions of current national and European legislation, as well as persons, companies, associations or professional firms that provide assistance and advice. Furthermore, when you participate in a sweepstakes or event, your data may be published on social media channels (e.g. Facebook, Instagram, YouTube), in accordance with the relevant sweepstakes rules and terms & conditions. As a result, such social media companies are operating as autonomous data controllers.

The data may also be processed, on behalf of the Controller, by external subjects designated as Processors of the processing, to whom appropriate operational instructions are given. These subjects are essentially included in the following categories:

- a. companies offering maintenance services for websites and information systems;
- b. companies offering support in carrying out market studies;
- c. companies that provide management and maintenance services for the Controller's database;
- d. companies offering e-mail services;
- e. companies offering management services for the marketing automation platform;
- f. companies that provide organizational support and reception services for events.

The Company will not disclose your personal information except as described here:

- The Company may share your personal information with their Parent Company and Affiliates (the "Company Entities") for various purposes including data storage, consumer insights, analysis and marketing purposes. When we do so, these Company Entities will also use your information in a manner consistent with this Policy and all applicable privacy and data protection laws.
- The Company may also share your personal information with third parties we hire to perform support services for us and to help us use your personal information as described herein. These third parties are required to treat your personal information in compliance with all applicable privacy and data protection laws.
- In some cases, the Company may share your personal information with third parties who partner with us to provide products and services to our clients, such as distributors. If so, we will require these entities to use that information in a manner consistent with this Policy and all applicable privacy and data protection laws.
- The Company may also share your personal information with third parties when we have a good faith belief that such disclosure is necessary: (i) to comply with a law, regulation, court order, or other legal process; (ii) to detect, prevent, and respond to fraud, intellectual property infringement, violation of our contracts or agreements, violation of law, or other misuse of the Website, products or services; (iii) to protect the Company's rights or property or yours or others' health, safety, welfare, rights, or property; or (iv) under similar circumstances. If such an event occurs, we will take appropriate steps to protect your personal information.
- The Company may share your personal information with third parties in connection with the sale, purchase, merger, reorganization, liquidation, or dissolution of the Company, or under similar circumstances. If such an event occurs, we will take appropriate steps to protect your personal information in compliance with applicable laws and regulations and the consent you may have provided.
- The Company may also share your information with your permission or at your request.
- The Company may share anonymized or aggregated information internally and with third parties for any purpose. Such information will not, at any time, identify you individually.

Where third party cookies are installed (with your consent), your data may be processed by third parties to whom the data is communicated.

The Website may contain links to websites or mobile apps that are not operated by the Company and plugins from social media platforms and other third parties. We provide these links and plugins as a service and do not imply any endorsement of the activities or content of the related websites, apps, or social media platforms, nor any association with their operators. To learn about the information collected by these third-party websites, apps, and plugins, please visit their privacy policies. We encourage you to review the privacy policies for the websites, apps, and social media platforms you visit before using them or providing personal information. Other than as described above, these third parties cannot track your online activities due to your use of the Website or the App.

	<b>DATA TRANSFER</b>	Depending on the Data Controller, your personal data could be processed in different countries.
	<b>DATA SUBJECTS' RIGHTS</b>	You may exercise specific rights on personal data collected by contacting the Data Controller at the following email address: <a href="mailto:aperolappcaribbean@campari.com">aperolappcaribbean@campari.com</a> . For example, you can request changes to your personal information by sending us an email at: <a href="mailto:aperolappcaribbean@campari.com">aperolappcaribbean@campari.com</a> . Once you have submitted your request by email someone will be in contact with you within 72 hours.
	<b>AUTOMATED DECISION-MAKING</b>	Personal data collected will not be subject to any automated decision-making techniques that are able to negatively affect you in any way.
	<b>UNDERSTAND CUSTOMER BEHAVIOUR AND PREFERENCES</b>	We use some publicly available personal information to take strategic marketing and communication decisions based on aggregated analysis of customer interests, preferences and behaviour. In fact, we adopt so called "social listening tools" that collect and analyse publicly available information shared by users on social networks. For example, through such tools, we will be able to understand how a given word or hashtag (e.g. #cocktails) is used on social networks and how people react to a post made by us on our social media channels.
	<b>VERSION OF THE DOCUMENT</b>	Last updated: October 2021 Version: 1.0

LOCAL COMPANIES		
COUNTRY	COMPANY	ADDRESS
Jamaica	<b>J. Wray and Nephew Limited</b>	23 Dominica Drive, Kingston 5, Saint Andrew, Jamaica
Other countries	<b>Davide Campari-Milano N.V.</b>	Official seat: Amsterdam, The Netherlands – Dutch Companies' Register No. 78502934 Corporate address: Via F. Sacchetti, 20 – 20099 Sesto San Giovanni (Milan) – Italy

Changes to this Policy will be posted on this site, along with information on any material changes. The Company reserves the right to update or modify this Policy at any time and without prior notice. Any modifications will go into effect ten (10) business days after the change is posted on this Website and will apply only to the personal information we collect after the posting.