

# MAISON ANGELVIN

SAINT-TROPEZ · FRANCE



## Privacy Policy

### SUMMARY OF HOW WE USE YOUR INFORMATION

We will use your information in order to comply with your requests, correspond with you, administer our competitions and process any wine orders you make with us or with our related companies.

This information will be shared with our related companies, who are often located outside France.

Where we rely on your consent (such as to send you marketing), you can withdraw this consent at any time. More details on how to withdraw consent are set out below.

### MAISON ANGELVIN AND YOUR PRIVACY

Maison Angelvin and its related entities and brands are committed to protecting the privacy of individuals' personal information. We will only collect, use or disclose personal information in accordance with relevant laws and this privacy policy. Please do not provide us with your personal information if you are not **of legal age** to purchase alcohol in the jurisdiction where you live or if you do not agree to the terms in this policy.

### INFORMATION YOU GIVE US

You provide us with information about yourself when corresponding with us, entering our competitions, buying our wines or when using or registering on our websites.

#### **This may include:**

- when you transact with us online, over the phone or in person;
- when you enter a promotion or competition conducted by us (including via our websites or through social media sites);
- when you visit and/or register to use one of our websites or when you participate in discussion boards or other social media functions on our websites; or
- when you contact us to request information or support in relation our company, products or services (including about our brands, shares in our company, product quality, visiting our sites or employment opportunities).

If you buy wine from us online for example, we will require you to provide us with your name, address and phone number so we can process your order and deliver your wine to you. We will also require your date of birth to verify that you are **of legal drinking age**, and your credit card number to process the sale.

## INFORMATION COLLECTED BY US AND OUR USE OF COOKIES

Apart from the information you give us directly, we also automatically collect information about you when you visit our websites, including through the use of cookies.

Cookies are small data files that are downloaded onto your computer when you visit a particular website.

### The information we collect is:

- technical information such as your computer's IP address, hardware type, browser type, device identifier and screen type/resolution;
- any search terms entered on our website;
- general location data based on your device or IP address;
- any technical errors or exceptions; and
- information about your visit such as the products you viewed or searched for, the length of your visit, page load speed, and the pages that you visited.

Cookies help us gather and store information about visitors to our websites. They help our websites remember what you chose on previous pages (to avoid having to re- enter information) and can help us to identify you as a unique visitor, tailor content based on past visitation and provide you with an optimised experience.

We use the following categories of tracking technologies on our websites:

- **Strictly Necessary tracking technology** - these technologies are essential in order to enable you to move around our websites and use their features.
- **Performance related tracking technology** - these technologies collect anonymous information on how people use our websites.

For example, we use **Google Analytics** to help us understand how users arrive at our websites, browse or use our websites and highlight areas where we can improve areas such as navigation, interface experience and marketing campaigns.

The data stored by these technologies never shows personal information from which your individual identity can be established.

- **Functionality related tracking technology** – these technologies remember choices you make such as the country you visit our websites from, your completion of the age verification check, language preferences and search parameters.

These can then be used to provide you with an experience more appropriate to your selections and to make the visits more tailored and pleasant. The information these technologies collect may be anonymised and they cannot track your browsing activity on other sites.

- **Targeting or advertising related tracking technology** – these technologies collect information about your browsing habits in order to make advertising more relevant to you and your interests.

They are also used to limit the number of times you see an advert as well as help measure the effectiveness of an advertising campaign. These technologies are usually placed by third party advertising networks. They remember the sites you visit and that information is shared with other parties such as advertisers. For example, we use third party companies such as Facebook

and Google to provide you with more personalised adverts when visiting other websites and social networks. A mix of first party and third party cookies are used.

- Social Media related tracking technologies - these technologies allow you to share content from our websites on social media such as Facebook and Twitter, or use your login to these social networks to verify your age when visiting our websites. These technologies are not within our control.

Please refer to the respective privacy policies for how their technologies work.

Commerce related technologies – these technologies are essential in order to enable a functional online shopping experience across our websites, stores and payment/checkout. They keep track of what products and quantities are in your shopping cart, your membership level, your country / state (if applicable for tax or shipping compliance reasons) and any coupons or discounts you are utilising.

If you prefer not to receive cookies you can adjust your Internet browser to refuse cookies or to warn you when cookies are being used. However, some parts of our websites will not function if cookies are turned off. We therefore strongly recommend that you leave cookies fully functional. For more information about cookies, please see **[www.allaboutcookies.org/cookies](http://www.allaboutcookies.org/cookies)**. For information about how to manage cookies, including how to disable cookies in most internet browsers, see here. You can also opt-out from targeted ads from Facebook and Google. For more information on how to opt out from :

**Facebook** : <https://www.facebook.com/help/568137493302217/>

**and for Google** : <https://support.google.com/ads/answer/2662922?hl=en-AU>

## **OUR USE OF YOUR INFORMATION**

We will not use your information to carry out electronic marketing unless we have your consent. For example, if you have entered a promotion in relation to our products, we may obtain your consent to send marketing materials about those products. If you receive electronic communications from us, we will always provide you with an opportunity to unsubscribe from receiving further information from us by clicking on the unsubscribe link provided in the communication.

We also use the information we collect from you directly or when you use our websites as required to conduct our business and pursue our legitimate business interests, by:

- administering our websites and to trying and keep our websites safe and secure;
- helping us gain a better understanding of your likes and dislikes so as to improve our websites and the services we offer;
- sending you relevant direct marketing, where we do not need your consent;
- allowing you to participate in interactive features of our websites and administering our promotions and competitions;
- providing products and services you have requested, and responding to any comments or complaints you send us;
- verifying that you are of legal drinking age in your jurisdiction (if applicable); and
- making suggestions and recommendations to you and other users of our websites about goods or services that may interest you or them.

We also use your information in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation).

We also use your information to fulfil a contract we may have with you, such as where you make a purchase from us or enter one of our competitions.

In some instances, the provision of information to us is mandatory. If for example you want to buy wine from us and certain personal information is not provided (such as your age, your contact details and delivery address), then we will not be able to fulfil your order. We will always ensure that we minimise the amount of data we collect and will only ask for data that we need to process your request.

## **WITHDRAWING CONSENT OR OTHERWISE OBJECTING TO DIRECT MARKETING**

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your information for other purposes, such as those set out above. You have an absolute right to opt-out of direct marketing, and to object to profiling we carry out for direct marketing purposes, at any time. You can do this by following the instructions in the communication (where this is an electronic message) or by contacting us using the details set out below.

## **HOW LONG WE KEEP YOUR INFORMATION**

Generally we will retain your personal information for the period necessary to fulfil the purposes for which your personal information has been collected (as outlined in this privacy policy) unless a longer retention period is required by law.

Where we process registration information, we retain this for as long as we consider that you are an active user of our sites and for 2 years after this.

Where we process personal information for marketing purposes or with your consent, we process the information until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your information indefinitely so that we can respect your request in future.

Where we process personal information in connection with performing a contract (such as when you purchase wine from us) or for a competition, we keep the information for 6 years from your last interaction with us.

Where we process personal information for site security and/or fraud management purposes, we retain it for 3 years.

## **OUR DISCLOSURE OF YOUR INFORMATION**

We will not disclose your personal information to third parties except:

### **with your consent;**

- where we are required or authorised by law to do so, for example to law enforcement agencies;
- where third parties appointed by us require access to personal information held by us to perform services (in which case we require these third parties to keep that personal information confidential and not to use or disclose it for any purpose other than the purpose of performing those services).

The types of third parties we may transfer information to include vendors, service providers, agencies and other partners who globally support our business and help us administer certain activities on our behalf, such as providing technical infrastructure services, marketing services, customer service, data hosting and management services, processing credit card payments services for us, and providing logistics and delivery services to help us deliver our products and services; or

- to our related companies in order to operate our global business and in accordance with the law.

We may also transfer personal information to a related company or a third party in the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock.

In some cases, undertaking the above activities involves transferring your personal information to other countries for the purposes of data processing and storage (including if applicable, to fulfil any orders you have placed with us). Depending on the location of the brand, winery or office you engage with or register with, transfers are made to Europe or other countries where we operate. Where information is transferred outside Europe, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, information is adequately protected by EU Commission approved standard contractual clauses. A copy of the relevant clauses can be provided for your review on request to the contact details provided in the Contact Us section. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this privacy policy.

Our websites sometimes contain links to other websites. With the exception of other sites owned by us, we do not control the privacy practices of sites reached through links from our websites. If you have any questions about the privacy practices of those websites then you should contact the relevant companies directly.

## **YOUR RIGHTS IN RELATION TO YOUR INFORMATION.**

You are entitled to ask us for a copy of the personal information we hold about you, including to correct, delete or restrict processing of your personal information. In some jurisdictions, applicable law may also entitle you ask us to transmit your data to another controller where the processing is based on your consent carried out by automated means, or entitle you to object to the processing of your personal information in certain circumstances (in particular, where we don't have to process the information to meet a contractual or other legal requirement, or where we are using the information for direct marketing or profiling). However these rights may be limited, for example if fulfilling your request would reveal personal information about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

To exercise any of these rights, you can get in touch with us using the details set out below.

## **SECURITY**

We take appropriate measures to keep your personal information secure. We have implemented appropriate physical and electronic procedures to protect the personal information we collect. If you have an account with us, you are responsible for maintaining the confidentiality of your account details including your password, and are responsible for any activity under your account. We will not be responsible for any loss arising from your failure to comply with this obligation.

Due to its nature, transmission of information via the internet is not completely secure. Although we will protect your personal data in accordance with this policy, we cannot guarantee the security of any data transmitted to our websites and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security measures to try to prevent unauthorised access.

## **CONTACT US**

If you have any questions or concerns about our collection, use or disclosure of personal information, wish to exercise your rights in relation to data protection or you wish to make a complaint in relation to our privacy practices, please contact us at:

[logan.wallace@maisonangelvin.com](mailto:logan.wallace@maisonangelvin.com)

If you have a complaint or concern about how we use your personal data, please contact us in the first instance and we will attempt to resolve the issue as soon as possible. You also have a right to lodge a complaint with your national data protection supervisory authority at any time.

For the purposes of the EU General Data Protection Regulation contact :

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