

Privacy Policy

Last updated: 17 July 2026

Pernod Ricard Nigeria Limited, in its role as Data Controller, respects your right to privacy when you use our digital media (our websites, mobile applications, social media pages, and online registration forms for our events) and communicate electronically with us, and also when we interact with you offline, including at events and shows we promote or sponsor. This Policy covers both online and offline collection, storage and use of your personal data.

This Privacy Policy explains how Pernod Ricard Nigeria Limited, a company duly organised under the laws of the Federal Republic of Nigeria, with its business address at 7th Floor South Point Tower, 40B Adetokunbo Ademola, Victoria Island, Lagos, Nigeria ("Pernod Ricard", "we", "us"), collects, stores, uses and processes your personal information ("Personal Data") through any digital or manual platform we operate, and through our events, shows and sponsorships (together, "Digital Media"). References to Digital Media in this Policy include manual and offline media and platforms as well.

Topics

1. What Personal Data do we gather about you and how do we collect it?

Personal Data is collected only for the purposes set out in Section 3 below, each time you use a feature, product or service offered by us, or attend or register for an event we sponsor or promote.

The type and amount of information collected varies depending on the activity, and may be updated from time to time as our activities evolve.

We will only process your Personal Data where we have a valid legal basis to do so under applicable data protection law. Where processing is based on your consent, we will obtain your prior, explicit and informed consent before collecting or using your Personal Data for the specific purpose identified at the point of collection.

Your use of our Digital Media, completion of a form, attendance at an event, or provision of Personal Data does not, by itself, constitute consent. Where consent is required, you will be given a clear choice to accept or decline, and you may withdraw consent at any time without affecting the lawfulness of processing carried out before withdrawal.

Most Personal Data is collected directly from you - for example, when you complete a form on our Digital Media, contact us, or register for an event. With your consent, we also collect Personal Data through tracking technologies when you browse our Digital Media (see Section 2 and our Cookie Policy).

Subject to applicable law, we may use tools that allow us to target advertising on social media, in which case your identity, contact and social media information (profile data, social-demographic and behavioural data, and interests) may be processed for that purpose.

2. How and why do we use tracking technologies?

Pernod Ricard uses tracking technologies such as cookies, IP addresses and log files to tailor our Digital Media to your needs and to offer content adapted to your interests.

- Cookies: subject to your consent where required by law, we use cookies and similar technologies to understand how visitors use our Digital Media, improve functionality, and provide adapted content. Further detail, and how to disable cookies, is in our Cookie Policy.
- IP addresses: we may keep track of IP addresses to troubleshoot technical issues, maintain website safety and security, restrict access where required by law or contract, and understand usage of our Digital Media.
- Log files: we, or a third party on our behalf, may collect anonymised log-file information (browser/operating system type, session information, navigational/click-stream data) for internal marketing and demographic studies, used only internally and not associated with any particular user.

3. For what purposes do we use your Personal Data and on what legal grounds?

We collect and use your Personal Data for the following purposes and corresponding legal bases:

- To respond to your requests and provide services, or to take steps at your request before entering into a contract - necessary for performance of a contract or pre-contractual measures.
- To handle and resolve claims, complaints or inquiries relating to our products, services or events - necessary for performance of a contract, or based on our legitimate interest in managing customer relationships where no contract exists.
- To send transactional or administrative communications (e.g. confirmation of sign-up, service announcements, changes to this Policy) - based on legitimate interest or performance of a contract.
- To send you marketing information, where you have consented - for example, invitations to promotions, contests, newsletters or alerts.
- Where you use a third-party sharing feature (e.g. "Send to a friend"): the Personal Data collected is used only once to send the communication and is not further retained, subject to local law.
- To fulfil our legitimate interest in better serving your needs, including combining or enhancing Personal Data with demographic or survey information for internal marketing studies, always compatible with the purpose for which consent was originally given.
- To manage and track inquiries and comments, including compliance-related contacts, via contact forms or email - necessary for performance of a contract.
- To promote, organise, run and evaluate the shows and events we sponsor, and to create promotional and, where separately consented to, commercial content from those events (see Section 7).

We take reasonable steps to keep your Personal Data accurate and up to date and to avoid duplication in our records.

4. What happens if you do not wish to provide your Personal Data?

If you choose not to provide requested Personal Data, you may be unable to participate in certain activities or benefit from personalised features, and some services may be limited - for example, you will not receive our newsletters if you do not share your email address. You do not need to provide any Personal Data simply to browse our Digital Media. We will always tell you what Personal Data is necessary to benefit from a given service, and this includes telling you,

at the point of an event or activation, whether photography or filming will occur and what participation, if any, is required of you.

5. To whom do we disclose your Personal Data and why?

Within the Pernod Ricard Group

We may share your Personal Data within the Pernod Ricard Group, including affiliates worldwide, for the purposes set out in Section 3.

With third parties

- Marketing service providers, where you have given consent.
- Support providers: agents or contractors who support the internal operations of our Digital Media and events. These parties must provide the same level of security as Pernod Ricard and, where required, are bound by a data-processing agreement to keep your Personal Data private, secure, and processed only on our instructions.
- Event, photography, video and creative partners: photographers, videographers, event-production agencies, and media-buying or advertising agencies who capture, edit, host or distribute event imagery on our behalf, under a written data-processing agreement consistent with the Nigeria Data Protection Act 2023.
- Joint or co-sponsored programme partners: where we run a joint promotion with another company or reputable third party and collect Personal Data as part of it, we may share your Personal Data with that partner, subject to your consent where required, and we will tell you at the point of collection if a company other than Pernod Ricard is collecting or receiving your Personal Data.
- For litigation and safety purposes, or where required by law, to comply with legal process, respond to claims, or protect the security or rights of Pernod Ricard, its customers or the public.
- In the event of a merger, acquisition, sale or reorganisation of all or part of our business, Personal Data may be transferred to the acquiring or successor entity, subject to applicable law.

6. Is your Personal Data sent to recipients outside Nigerian territory?

Pernod Ricard is a global company, and your Personal Data may be transferred to and processed in countries outside Nigeria, including by other Pernod Ricard Group companies, service providers and partners - for example, a global brand or creative agency, a digital asset-management vendor for event photography and video, or a Pernod Ricard Group marketing team coordinating an international campaign. These countries may have data protection laws that differ from those of Nigeria.

Where a cross-border transfer occurs, we will ensure it complies with applicable data protection law, including the Nigeria Data Protection Act 2023, and we will implement appropriate safeguards so that your Personal Data receives a level of protection not less than that required under the Act. These safeguards may include binding corporate rules/agreements with recipients requiring them to process data only on our documented instructions, implement appropriate technical and organisational measures, and maintain confidentiality. Where required, transfers will be made only to jurisdictions with an adequate level of data protection, or under another lawful transfer mechanism recognised under applicable law.

You may request further information about the safeguards in place for a specific cross-border transfer of your Personal Data by contacting us using the details in Section 12.

7. Events, photography and video: how we use your image and likeness

This section applies whenever Pernod Ricard promotes a show, sponsors or runs an event, or otherwise captures photography or video of attendees, and explains, separately from our general marketing terms above, how we use your image and likeness in that context.

7.1 Notice before we capture your image

Where an event we sponsor or run involves photography or filming, we will give clear notice before or upon entry - through event terms and conditions, ticket-purchase disclosures, and on-site signage - that photography or filming will take place, the general purposes for which it may be used, and how you can decline to be filmed or photographed. Your attendance at an event does not, by itself, constitute your consent to any commercial use of your image.

7.2 Editorial/promotional use versus commercial use

We distinguish between two categories of use of event imagery:

- Editorial or promotional use - for example, a recap video, news coverage, or a social media post showing that an event took place, where you may appear incidentally as part of a crowd or audience. We rely on our legitimate interest in promoting our brands and events for this use, balanced against your rights, and you may object at any time as described in Section 10.
- Commercial or advertising use - for example, using your identifiable image in paid advertising, product packaging, or a campaign asset. We will only use your identifiable image for this purpose with your separate, specific and informed consent, typically recorded through a signed or digitally logged release, which you may withdraw at any time (without affecting the lawfulness of use before withdrawal, and subject to withdrawal of already-published material being addressed on a reasonable-efforts basis).

7.3 Declining to be photographed or filmed

At events where photography or filming is planned, we will offer a practical way to opt out of appearing in commercial content - such as a designated 'no-photography' area, an identifying wristband or lanyard recognised by our photographers, or a request point on-site. Details specific to each event will be provided in the event notice referred to in Section 7.1.

7.4 Requesting removal of your image

If you are identifiable in promotional or commercial material already published and wish to have it removed or your identity obscured, you may contact us using the details in Section 12. We will assess and, where reasonably practicable, action such requests, taking into account the nature of the material, where it has been distributed, and any competing legal or contractual obligations.

7.5 Retention of event photography and video

We retain event photography and video for a defined period appropriate to its purpose, and periodically review our brand asset library. We will not reuse identifiable event imagery for a materially different purpose from that originally disclosed to you without providing fresh notice or obtaining fresh consent, consistent with the purpose-limitation principle under the Nigeria Data Protection Act 2023.

7.6 Minors at events

Our products and Digital Media are not intended for individuals below the legal drinking age ("Minors"), and our events are intended for an adult audience. Where an event is held at a venue that Minors may lawfully attend or pass

through, we take reasonable steps to avoid using identifiable images of Minors in commercial or advertising material without verifiable parental or guardian consent - including, where appropriate, excluding or obscuring identifiable Minors from published commercial assets. If you believe an identifiable Minor has appeared in our promotional or commercial material without appropriate consent, please contact us using the details in Section 12 and we will take reasonable steps to remove or obscure the relevant content.

8. How long do we keep your Personal Data?

We store the Personal Data you send us through our Digital Media for as long as your account is active, for the duration of any contract with you, or as needed to provide requested services, answer queries, or resolve problems. We may retain Personal Data thereafter in accordance with our internal retention procedures, to comply with legal and regulatory obligations, resolve disputes, and enforce our agreements, including in accordance with the applicable statute of limitations. Event photography and video are subject to the specific retention approach described in Section 7.5.

9. How do we secure your Personal Data?

We take appropriate technical and organisational measures to protect the confidentiality and security of your Personal Data, including: storing Personal Data in secure operating environments accessible only to authorised Pernod Ricard employees, agents and contractors; and verifying the identity of registered users before granting access to Personal Data we hold about them.

10. What are your rights regarding your Personal Data?

- Where processing is based on consent, you can withdraw that consent at any time, without affecting the lawfulness of processing before withdrawal.
- You can request access to your Personal Data.
- You can request rectification of your Personal Data if it is inaccurate, incomplete or out of date.
- You can request erasure of your Personal Data where it is no longer necessary for the purpose collected, where you have withdrawn consent and there is no other lawful basis, where you have objected to processing, where processing is unlawful, or where erasure is required to comply with a legal obligation. We will take reasonable steps to inform other Pernod Ricard Group entities of such erasure.
- You can request restriction of processing in specified circumstances, including while the accuracy of your Personal Data is contested, where you prefer restriction to deletion despite unlawful processing, where you need the data for a legal claim, or while we verify whether our legitimate interest overrides your objection.
- You can request portability of Personal Data you provided to us, where practicable.
- You always have the option not to share Personal Data with us, which may limit the activities and features we can offer you.
- You have the right to object, at any time, to processing of your Personal Data for direct marketing, for marketing based on profiling, or where processing is based on our legitimate interest (unless we can demonstrate compelling legitimate grounds).
- You have the right not to be subject to a decision based solely on automated processing, including profiling, that produces legal effects or similarly significantly affects you, except where authorised by law with appropriate

safeguards - in which case you may request human intervention, express your point of view, and contest the decision.

- Specific to events: you have the rights described in Section 7, including declining to be photographed or filmed, and requesting removal of your identifiable image from published commercial material.

You may exercise any of these rights, or raise a concern, by contacting us using the details in Section 12, and you have the right to lodge a complaint with the Nigeria Data Protection Commission (see Section 14).

11. How do we process children's and Minors' Personal Data?

Our Digital Media and products are not intended for individuals below the legal drinking age ("Minors"), and we do not knowingly collect Personal Data from Minors through our Digital Media. We implement appropriate age-verification measures at account creation or engagement, which may include self-declaration of age and/or additional verification mechanisms where reasonably necessary. Individuals must be at least eighteen (18) years old, or the applicable legal drinking age in their jurisdiction if higher, to create an account and use our Digital Media.

Where processing of a Minor's Personal Data is required and permitted by law, it will only occur with verifiable consent of a parent or legal guardian. If we become aware that we have collected a Minor's Personal Data without valid parental or guardian consent, we will take reasonable steps to delete it and, where appropriate, disable the associated account. Our approach to Minors incidentally present at sponsored events is set out separately in Section 7.6, since such individuals are not "using our Digital Media" in the account-based sense addressed above.

12. Our Data Protection Officer and how to contact us

We have designated a Data Protection Officer (DPO) responsible for overseeing our compliance with the Nigeria Data Protection Act 2023. If you have any questions, complaints or comments regarding this Privacy Policy, our information-collection practices, or any of the rights described above, you may contact our DPO at:

SRV.PRN.DigitalAccountsManagement@pernod-ricard.com, or write to us at 7th Floor South Point Tower, 40B Adetokunbo Ademola, Victoria Island, Lagos, Nigeria, marked for the attention of the Data Protection Officer.

13. How we respond to a Personal Data breach

If we become aware of a Personal Data breach that is likely to result in a risk to your rights and freedoms, we will assess the breach and, where required by the Nigeria Data Protection Act 2023, notify the Nigeria Data Protection Commission within the timeframe prescribed by the Act, and notify affected individuals without undue delay where the breach is likely to result in a high risk to their rights and freedoms. We maintain an internal incident-response process to detect, investigate and remediate Personal Data breaches, including those involving event photography, video or other imagery.

14. How can you lodge a complaint with the relevant Authority?

If you have any questions, complaints or comments regarding this Privacy Policy or our information-collection practices, please contact our Data Protection Officer using the details in Section 12. You may also lodge a complaint with the Nigeria Data Protection Commission if you have concerns about how we process your Personal Data.

16. Changes to our Privacy Policy

We keep this Privacy Policy under regular review and will post any updates on this page. This Privacy Policy was last updated on 17 July 2026.