

## PRSA Online Privacy Policy

*Last updated: March 2025*

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### Introduction

PRSA South Africa Pty Ltd (**PRSA**) respects your right to privacy when you use our digital media (such as our websites, our mobile applications, our social media pages, and any online registration forms for our events and newsletters – together the “**Digital Media**”) and communicate electronically with us.

This privacy policy (the “**Privacy Policy**”) applies to the following persons (“**you**”):

- All users of our Digital Media;
- The clients of our Digital Media;
- The participants to our events, sweepstakes and/or contests;
- The participants to our surveys;
- The recipients of our marketing messages/advertising.

The purpose of this Privacy Policy is to inform you how PRSA collects, stores and uses the personal information (including ‘personal information’ as that term is defined in Section 1 of the *Protection of Personal Information Act, 2013* collected from you.

This Privacy Policy may be updated at any time as a result of, among others, legal, technical or commercial changes. We will notify you, by appropriate means, of any substantive change in this Privacy Policy. You are also invited to regularly read this Privacy Policy to make sure you are aware of the latest version.

### 1. WHO IS THE RESPONSIBLE PERSON FOR THE PROCESSING OF YOUR PERSONAL INFORMATION?

PRSA South Africa Pty Ltd , a company duly incorporated under the laws of South Africa, with registration number **1994/004226/07**, having its principal place of business at Building 6, Country Club Estate, 21 Woodlands Drive, Woodmead, Johannesburg, 2191 (“**PRSA**” or “**we**”, “**our**”, “**us**”) acts as the “responsible person” for the processing of your personal information (i.e. it is the entity that determines the purpose of and means for the processing personal information).

Please note that PRSA markets products and services under various [brands](#) and will process the personal information you provide when interacting with any of these brands.

## **2. WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU AND HOW?**

“Personal Information” refers to information relating to an identifiable, living, natural person and where it is applicable, an identifiable, existing juristic person. We collect most of the personal information directly from you, for example , when you engage with us by filling out a contact form, creating an account, using interactive features, subscribing to a service, registering and attending an event, joining a loyalty program, attending any of our experiences, courses and testing, participating in a marketing campaign, entering a contest, ordering a product or service, requesting information, or responding to surveys.

We may also collect personal information from cookies on our website (cookies policy is available in the footer of each of our website).

Depending on the purposes of collection, personal information collected are the following:

- your name, your gender and contact details, including your postal address, email address, and phone numbers, and, where applicable, your business contact details; information allowing us to verify and check your identity, such as your date of birth;
- your billing and delivery information, transaction and payment card information;
- location information;
- information to enable us to undertake financial checks on you to the extent permitted by applicable law;
- your professional online presence, e.g. LinkedIn profile;
- information from accounts you link to us, e.g. social media;
- your contact history, purchase history, and saved items;
- your interests, tastes and preferences;
- information on how you use our Digital Media;
- your responses to surveys and promotions;
- your IP address and your mobile/tablet/device identifier;
- customer service information (e.g., customer service inquiries, comments);
- content you may provide to us (e.g., images, comments, audio recordings, etc.).

The personal information collected is necessary to achieve the purposes described in section 3 below. If you do not provide the personal information we request, it may delay or prevent us from providing you with products or services.

## **3. FOR WHAT PURPOSES AND ON WHAT LEGAL GROUNDS ARE PERSONAL INFORMATION PROCESSED?**

PRSA collects and processes personal information that is relevant, adequate, not excessive and strictly necessary for the purposes pursued.

You will find below a table listing:

- The different purposes of the processing operations (i.e. why we use your personal information );
- The legal basis on which we rely to carry out the processing (i.e. why we are authorised to use your personal information) under *the Protection of Personal Information Act, 2013*.

PURPOSE OF THE PROCESSING	LEGAL BASIS
<p><b>Restrict access to our Digital Media</b> to comply with applicable law or contractual restrictions</p>	<p>PRSA’s compliance with its <b>legal obligations</b></p>
<p>Manage <b>the creation of an account</b> and your <b>registration to the services/features available on our Digital Media</b> including events and contests and provide you with the relevant services/features you have subscribed</p>	<p><b>Performance of a contract</b> (e.g. our Terms &amp; Conditions) <b>between PRSA and you</b> (including the execution of pre-contractual measures) to provide you with the requested service.</p>
<p><b>Provide you with marketing information</b>, about the various brands we sell, <b>(i) by electronic communications, phone and (ii) by displaying advertisements</b> for you and people with a similar profile to you, <b>on PRSA Digital Media and/or any digital advertising platforms</b> such as social media platforms.</p> <p><i>Please note that, in order to display advertisements likely to be of interest to you, we will share your identification information (such as your surname, first name, contact details) to the relevant digital advertising platforms (such as social media). Once your information is shared on such platforms, it is used to enable them to find you among their users, and (i) to show you ads about our products and services relating to brands operated by us when you browse such platforms, and (ii) to identify, based on your profile on the relevant platforms, lookalikes who may also be interested by PRSA’s ads.</i></p> <p><i>In the context of these activities, we do not however, collect or access at any time the personal information concerning you held by the digital advertising platforms concerned and relating in particular to your profile or your behaviour on such platforms.</i></p>	<p>Your <b>consent</b>.</p>

<p><b>Improve our customer knowledge / enrich your profile</b></p> <p>Allow us to learn more about your tastes and preferences through agreed interactions with you and more generally log our interactions with you as it is our legitimate interest to <b>learn more about your tastes, your expectations, understanding how you use our services to provide a more customized service and improve our offers to you</b>. This would also allow us to <b>send you marketing communications better tailored to your interests and thus more relevant</b>.</p> <p>Subject to legal requirements under applicable laws, we will occasionally combine, update, or otherwise enhance the personal information collected through our Digital Media with information we receive from outside records or third parties.</p>	<p><b>PRSA’s legitimate interest</b>, more specifically its economic/business interest to better serve your needs.</p>
<p><b>Manage joint and co-sponsored programs and promotions</b></p>	<p><b>Your consent</b></p>
<p>When <b>you use the third-party sponsorship (“Send to a friend”) feature</b>. The personal information collected is used only once to send the communication and is not further retained by us, as appropriate according to local law.</p>	<p><b>Your consent or the legitimate interest when permitted by law.</b></p>
<p><b>Measure the performance of our business (including our marketing campaigns) and analyze of such performance to improve it</b></p>	<p><b>PRSA’s legitimate interest</b>, more specifically its economic/business interest in optimizing its activities and its marketing campaigns to improve the user experience and boost sales.</p>
<p><b>Ensure the proper functioning of our Digital Media (for example via audience measurement and statistics) through trackers such as cookies</b> strictly necessary for the provision of an online communication service expressly requested by the user or solely intended to enable or facilitate communication by electronic means (for more information you can refer to our cookies policy available in the footer of each of our website.)</p>	<p><b>PRSA’s legitimate interest</b> to ensure the proper functioning of its Digital Media.</p> <p><b>Your consent</b>, when necessary and/or required by law.</p>

<p><b>Optimize your user experience, provide you with advertising and content adapted to your interests</b> through the setting of cookies on our Digital Media – for more information you can refer to our cookies policy available in the footer of each of our website.</p>	<p><b>Your consent</b></p>
<p><b>Handle any request or feedback you make about our products and/or services (complaints, comments, satisfaction survey, etc.)</b></p>	<p>Depending on the purpose of your request, the legal basis is either:</p> <ul style="list-style-type: none"> <li>- <u>If your request is not related to a product/service already purchased from/subscribed with PRSA: PRSA's legitimate interest</u>, more specifically its economic/business interest to serve your needs and allow you to communicate with us simply and efficiently;</li> <li>- <u>If your request is related to a product/service already purchased from/subscribed with PRSA: the performance of a contract</u> (e.g. our Terms &amp; Conditions) <b>between PRSA and you.</b></li> <li>- In South Africa, where PRSA is handling your complaint/enquiry, we consider that the use of your personal information for this purpose is the 'primary purpose' of the collection of your personal information, pursuant to APP 6.</li> </ul>
<p><b>Organize polls and surveys to get your feedback regarding our products and services</b></p>	<p><b>Your consent</b></p>
<p><b>Maintain the safety and security of our Digital Media and ensure fight against the fraudulent use of our websites or services</b></p>	<p><b>PRSA's legitimate interest</b>, more specifically its business and economic interest to provide you with secure Digital Media and services.</p> <p>In South Africa, where PRSA uses and/or discloses personal information for this purpose it does so in accordance with the relevant exceptions to the APPs, including, but not limited to, APP 6.</p>

<p><b>Send you transactional, legal or administrative communications</b></p>	<p><b>Performance of a contract</b> (e.g. our Terms &amp; Conditions) <b>between PRSA and you</b> (including the execution of pre-contractual measures) to provide you with the requested service.</p> <p>For legal communications: PRSA’s compliance with its <b>legal obligations</b>.</p>
<p><b>Establish any evidence necessary to defend our rights</b> and manage pre-litigation and litigation proceedings</p> <p><b>Respond to requests from the relevant authorities</b> and defend our rights based on our legal obligations.</p>	<p><b>PRSA’s legitimate interest</b> to defend its rights.</p>
<p>Manage a <b>merger or acquisition</b> of all or part of PRSA or a <b>corporate reorganization</b></p>	<p><b>PRSA’s legitimate interest</b> i.e. its economic/business interest to anticipate and perform a corporate operation.</p>
<p><b>Handle information subjects’ rights</b></p>	<p>PRSA’s compliance with its <b>legal obligations</b>.</p>
<p><b>Manage your order, the delivery of products</b> purchased on our Digital Media as well as <b>manage product returns and after-sales services</b></p>	<p><b>Performance of a contract</b> (e.g. our Terms &amp; Conditions) <b>between PRSA and you</b> (including the execution of pre-contractual measures) to provide you with the requested service.</p>
<p><b>Accounting management</b></p>	<p>PRSA’s compliance with its <b>legal obligations</b>.</p>

**Secure the payment of your purchases on our Digital Media (and detect fraudulent payments)**

*In this context, PRSA may process Personal information involving automated decision making, where necessary for the performance of a contract (e.g. avoid fraudulent payment). It is specified that payment information (credit card number/details/banking information) is not collected by us but directly by the payment service providers. Due to automatic fraud detection, (i) the processing of your order/request may be delayed while we review your transaction; and (ii) you may be excluded from the benefit of a service or access to the service may be limited if a fraud risk is detected.*

**PRSA's legitimate interest**, more specifically its business/economic interest to provide you with secure payments.

#### 4. TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION AND WHY?

- **To internal authorised employees**

- We will communicate your information to **our employees** who need to process your personal information for the purposes specified in Section 3 of this Privacy Policy, in particular to our digital marketing, sales, accounting and tech teams. Your personal information can also be processed by employees from PRSA Group's affiliates worldwide, in particular from our [Brand companies](#), where PRSA affiliates provide support services (IT, administrative, marketing support) as processor of PRSA.

- **To service providers**

- **For marketing and communication purposes, including competitions and events:** we will share your information with our marketing and communication service providers such as advertising agencies, marketing agencies, social media and digital agencies to help us carry out competitions and events, advertising, marketing and sales campaigns, as well as analyzing their effectiveness and manage your contacts and queries.
- **For IT support purposes:** we will share your information with our IT support service providers (for hosting, maintenance and technical support services) to help us for the internal operations of our Digital Media and to assist us with administering them or the various features, programs and promotions available on it.
- **For management of orders, payments, deliveries and after sales purposes:** we will share your information with our IT support services providers, customer support, logistical and transport services and payment services providers.

- **To partners**

- For joint and co-sponsored programs or promotion: when we run a joint or co-sponsored program or promotion on our Digital Media with another company, organization, or other reputable third party, we may share your personal information with **our partner or sponsor**. If your personal information is shared with a company other than PRSA as part of such program/promotion, we will let you know this at the time your personal information is collected.
- For targeted advertising purposes: as indicated above, we will share, with your consent, your personal information with **digital advertising platforms** to display targeted ads on them, about the products and services of our various brands, to you and people with a similar profile to you. For more information about how such social media process your personal information and on how to exercise your rights with them in connection with any further processing of your personal information, we invite you to view their privacy policies on their websites.

- **To other third parties**
- **For marketing communication purpose**, we may disclose your personal information to our business partners only with your consent. In this context, your information is processed by the partner in question, who acts as the information controller. In such case, your information are subject to the information controller's general terms and conditions and to its own personal information protection policy. We recommend that you carefully review such information/documents before consenting to the disclosure of your information to our partners.
- **For litigation and safety purposes**: we may also disclose your personal information to **authorities and/or external counsels** if we are required to do so by law, or if in our good faith judgment, such action is reasonably necessary to comply with legal processes, to respond to any claims, or to protect the security or rights of PRSA, its customers, or the public.
- **In the event of a merger or acquisition of all or part of PRSA by another company**, or in the event that PRSA were to sell or dispose of all or a part of the PRSA business, the **acquirer** may have access to the information maintained by that PRSA business, which could include personal information, subject to applicable law. Similarly, personal information may be transferred as part of a corporate reorganization, insolvency proceeding, or other similar event, if permitted by and done in accordance with applicable law. If applicable, the acquirer who will act as the new information controller will process your personal information in the conditions provided in the acquirer's privacy policy.

## 5. IS YOUR PERSONAL INFORMATION SENT TO RECIPIENTS OUTSIDE THE EUROPEAN UNION?

PRSA is a global company and your personal information may be transferred to countries outside of South Africa where [PRSA Affiliates](#) and third parties operate, such transfers will take place only if permitted and carried out in compliance with applicable laws. Where this occurs, PRSA ensures that your information is handled in compliance with the Protection of Personal Information Act and that adequate data protection agreements are in place.

## 6. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We will store the personal information that you sent us via our Digital Media in our information bases as long as your account is active, for the duration of the contract with you or as needed to provide you the services you requested or to answer queries or resolve problems, or else to provide improved and new services.

We may also retain your personal information in accordance with our internal retention procedure as necessary to comply with our legal and regulatory obligations, resolve disputes and enforce our agreements.

## 7. HOW DO WE SECURE YOUR PERSONAL INFORMATION?

PRSA takes all reasonable technical and organizational measures to protect the confidentiality and security of your personal information collected via our Digital Media. These efforts include but are not necessarily limited to: (i) storing your personal information in secure operating environments to which the public does not have access, but only authorized PRSA employees, and our agents and contractors; and, (ii) verifying the identities of registered users before they can access the personal information we maintain about them.

Our Digital Media may link up users to other websites of third parties and/or affiliates or subsidiaries of PRSA, through hyperlinks; this is a service available to you as a user of the site. Such links do not constitute an endorsement by PRSA of the linked sites, their content, including products, advertising or any other materials featured on them. PRSA has no control over these linked sites and cannot be held responsible or liable for their content, including products, advertising or any other materials featured on them, or any purchase you may choose to make on these linked sites.

## 8. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION?

You have the following rights with respect to your personal information:

- If your personal information has been processed on the basis of your consent, you can **withdraw your consent at any time** (*see the table in section 3 of this Privacy Policy to understand which processing are based on your consent*).
- You have the **right to request to obtain a copy** of the personal information we hold about you.
- You can request **to rectify your personal information** if they are inaccurate, incomplete or out of date.
- You can request the **erasure of your personal information** (i) if your personal information is no longer necessary for the purposes mentioned above in section 3, (ii) if you have withdrawn your consent for a information processing based exclusively on such consent, (iii) if you have objected to the information processing, (iv) if the personal information processing is unlawful, (v) if the personal information must be erased to comply with a legal obligation applicable to PRSA. Please note however that this is not an absolute right, as we may be obliged to retain your personal information for legal or legitimate reasons.
- You can request **the restriction of the processing**. You may ask us to restrict the processing of your personal information in specific cases (e.g., if you contest the accuracy of your personal information).
- You have the **right to information portability**, meaning to receive (and transmit to another information controller) personal information that you have provided to us and that we hold about you in a structured, commonly used and machine-readable format. This applies only where the processing is based on your consent or the execution of pre-contractual measures

/ performance of a contract and is carried out by automated means (see the table in section 3 of this Policy to understand which processing rely on these legal basis).

- **You have the right to object to the processing of your Personal information by us, at any time, (i) for direct marketing purpose including based on profiling, or (ii) if the information processing is based on the legitimate interest of PRSA, except if we can demonstrate compelling legitimate grounds for the processing - (see the table in section 3 of this Privacy Policy to understand which processing are based on PRSA's legitimate interests).**

To exercise all these rights, you can send a request to: Information Privacy Champion, Pernod Ricard South Africa, Building 6, Country Club Estate, 21 Woodlands Drive, Woodmead, 2191 or by emailing [prsalegal@pernod-ricard.com](mailto:prsalegal@pernod-ricard.com) or [Angie.Mabuza@pernod-ricard.com](mailto:Angie.Mabuza@pernod-ricard.com)

You are informed that you can also **lodge a complaint with the Information Regulator** at JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 or P.O Box 31533, Braamfontein, Johannesburg, 2017 or [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za) if you have any concern about the conditions of processing of your Personal Data by PRSA.

However, we invite you to contact PRSA at the address above before filing any complaint before any supervisory authority.

## **9. HOW DO WE TREAT CHILDREN'S PERSONAL INFORMATION?**

Our Digital Media are not intended for children under the legal drinking age ("Minor"), so we do not knowingly collect personal data from Minors. You must be at least eighteen years old to create an account and engage in activities and transactions on our Digital Media. If we are notified or learn that a Minor has submitted Personal Information to us through our Digital Media, we will delete such Personal Information.

## **10. HOW CAN YOU CONTACT US?**

If you have any questions, complaints, or comments regarding this Privacy Policy or our information collection practices, please contact us by writing to:

PRSA South Africa (Pty) Ltd

Building 6, Country Club Estate,

21 Woodlands Drive, Woodmead,

2191

or sending an email to: [prsalegal@pernod-ricard.com](mailto:prsalegal@pernod-ricard.com) or [Angie.Mabuza@pernod-ricard.com](mailto:Angie.Mabuza@pernod-ricard.com)

Pernod Ricard has appointed a Global Information Protection Officer that you can reach at [group.dpo@pernod-ricard.com](mailto:group.dpo@pernod-ricard.com).