

## **PRIVACY AND COOKIES NOTICE**

Version dated June 2020

### **PRIVACY NOTICE**

We are committed to safeguarding your privacy. This notice sets out how we will treat your personal data.

#### **Identity and contact details of the data controller**

The mobile application named “Do It You Shelf” or “DIYS” (the “Application”) is operated by Moët Hennessy South Africa Pty Ltd, a company having its registered address at 9<sup>th</sup> Floor, 22 Bree Street, Cape Town, South Africa, 8001, with company number 2015/380362/07, (“we”) in its capacity of data controller for the purposes of applicable data protection laws and regulations, including the General Data Protection Regulation (GDPR) of 27 April 2016 (or any replacing law, act or regulation regarding Data Protection in force in your country).

**Outside South Africa or unless otherwise indicated, the Moët Hennessy affiliate with which you are in contact or which is mentioned in the legal notices on the Application or in the Terms & Conditions of Use, whether in your country of residence or abroad, has the capacity of joint controller with Moët Hennessy South Africa Pty Ltd. What information do we collect?**

Personal data is collected directly from you when you use the Application and our services or automatically when you access the Application.

We may process the following categories of personal data.

Information you provide to us :

- Identification data : civil state, surname, last name, photograph ;
- Location Data (GPS Data) ;
- Information you may disclose when you contact us.

Information automatically collected :

- Login data such as your IP address, your terminal specificities and your logs.

#### **How do you use my personal data?**

We collect and process your personal data for the purposes listed below.

In order to perform a contract with you or in order to take steps at your request prior to entering into a contract (legal basis: Art. 6 (1) (b) GDPR):

- Create an account on our Application ;
- Any other services, current or future, related to the services we provide and listed in the relevant Terms & Conditions.

In order to comply with our legal obligations (legal basis: Art. 6 (1) (c) GDPR):

- Processing in connection with legal claims and compliance purposes (including disclosure of such information in connection with legal processes or litigation).

Based on your prior consent (legal basis: Art. 6 (1) (a) GDPR):

- Use of certain types of cookies. For more information regarding cookies, please read our [Cookies Notice](#).
- Personalize the content of our Application.

Based on our legitimate interests (legal basis: Art. 6 (1) (f) GDPR) to ensure the security of our Application and its users and the compliance with our Terms & Conditions of Use and to communicate with you via “Contact Us” or similar forms.

When we ask you to supply us with personal data we will make it clear where there is a statutory or contractual (mandatory) requirement to provide personal data and the consequences of not providing the data (for example, that we will not be able to process your order).

### Recipients of personal data

In accordance with law, we may share your personal data with :

- Our affiliates, to provide you with relevant content and services.
- Our processors providing it with hosting services.
- Law enforcement, governmental agencies, or authorized third-parties, in response to a verified request relating to a criminal investigation, alleged or suspected illegal activity or any other activity that may expose it, you, or any of its other users to legal liability.
- And our sub-processors.

The list of the trusted affiliates and recipients we may share your personal data with is accessible below.

The Application may contain links to other websites for reference purposes only. We are not responsible for the content, privacy notices or practices of third party websites in these circumstances. Please contact them directly for more information.

#### List of the trusted affiliates and recipients we may share your personal data with:

##### [Affiliates](#)

Hosting services providers: OVH

#### List of our trusted affiliates and partners using cookies on our Application:

### Data transfers

We may transfer personal data to countries outside the European Economic Area ("EEA"), including to countries which have different data protection standards to those which apply in the EEA. We have put in place European Commission approved standard contractual clauses to protect this data. You have a right to ask us for a copy of these clauses (by contacting us as set out below).

When we transfer your personal data to the U.S., we make sure that the data is transferred to a company that adheres to the Privacy Shield or we put in place appropriate guarantees that comply with applicable regulations relating to the protection of personal data.

For any questions regarding data transfers outside the European Economic Area, you can contact MHCS at the address set out below ("Contact DPO" section).

### Data retention

Data retention periods are listed in the table below.

Please note however that appropriate data related to subscription of current services will be deleted one (1) month after you have notified us that you want to unsubscribe to such services.

<b>Data processing</b>	<b>Data retention period</b>
Creation and management of your account on our Application	Deletion after 3 years of inactivity
Communication with you via contact form	Duration of the request resolution, then archived during 3 years starting from the resolve of the request
Legal claims management and compliance purposes	Duration of the claim and 5 years from the date of the claim.  If legal action : duration of the procedure until full execution of the Court decision or settlement agreement.

Security and integrity of the Application	Duration of security and integrity processes which may vary according to the operations carried out (3 to 6 months)
Fraud detection and prevention	Duration of the investigation (3 to 6 months) and then duration of the legal proceedings (if so)
Geolocation	No data retention

### **Amendments**

We may update this notice from time-to-time by posting a new version on our Application.

You should check this page occasionally to ensure you are happy with any changes. We may also notify you of changes to our notice by email.

### **Your rights**

Under the GDPR you may have different data subject rights (Art. 15-18 and 20-21 GDPR). You may ask us for a copy of your information, to correct it, erase it or to transfer it to other organisations at your request. You also have rights to establish instructions for the management of your data after death, to object to some processing and, where we have asked for your consent to process your data, to withdraw this consent. In particular, you have rights to object to direct marketing at any time. Where we process your data because we have a legitimate interest in doing so (as explained above), you also have a right to object to this. These rights may be limited in some situations (for example, where we can demonstrate that we have a legal requirement to process your data).

In order to respond to your request we may need to ask you to provide proof of identity or additional information. We will endeavour to respond your request as soon as possible.

Please let us know if the personal data which we hold about you needs to be rectified or updated by contacting us as set out below.

These rights may be exercised at any time by sending a letter or an e-mail to the following addresses:

Data Protection Officer - 43 Avenue de la Grande Armée - 75116 PARIS

contactdpo@moethennessy.com

### **Protection of persons under legal alcohol drinking and purchasing age**

As the access to the Application is governed by Terms of Use, we does not collect any Data or information concerning persons who are under legal alcohol drinking and/or purchasing age in their location of residence.

### **Contact details of the Data Protection Officer (DPO) and right to lodge a complaint**

Should you have any question about the collection and processing of your Data by MHCS, please contact the Data Protection Officer of Moët Hennessy by writing at “Data Protection Officer (DPO)” – 43 Avenue de la Grande Armée – 75116 PARIS or by sending an e-mail [contactdpo@moethennessy.com](mailto:contactdpo@moethennessy.com).

We hope that we can satisfy queries you may have about the way we process your data. However, if you have unresolved concerns you also have the right to complain to data protection authorities.

## **COOKIES NOTICE**

### **Cookies - what are they?**

A "cookie" is a piece of information, like a tag, that is stored on your computer, tablet or phone when you visit a website. It can help identify your device (like your PC or mobile phone) whenever you visit that website.

Cookies are used by most major websites including MHCS's. To make the best use of our Application, on whichever device you use, you'll need to make sure your web browser is set to accept cookies.

## What are cookies used for?

We use cookies and some other data stored on your device to:

- Give you a better online experience by displaying a customised editorial content based on what you have previously viewed.
- Allow you to set personal preferences (remember your login detail, choose a country and a language,).
- Protect your security.
- Measure and improve our service.
- Work with partners and measure the audience.

## So what information is kept by the cookie?

A cookie will typically hold:

- The name of the website that it has come from.
- How long the cookie will stay on your device.
- A value (usually a randomly generated unique number).

## The cookies we set

We use the following categories of cookies on our Application:

- **Strictly Necessary Cookies:** These cookies are essential in order to enable you to move around the Application and use its features. Without these cookies, services you have asked for such as remembering your login details cannot be provided.
- **Performance Cookies:** These cookies collect non-directly identifiable information on how people use our Application. For example, we use Google Analytics cookies to help us understand how customers arrive at our Application, browse or use our Application and highlight areas where we can improve, such as navigation, shopping experience and marketing campaigns. The data stored by these cookies never shows personal details from which your individual identity can be established.
- **Functionality Cookies:** These cookies remember choices you make such as the location you visit our Application from, language and search parameters such as size, colour or product line. 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 cookies collect may be non-directly identifiable and they cannot track your browsing activity on other websites.

You can access to the list of the cookies we use and manage your consent by clicking [here](#) [active link to OneTrust].

You can access to the list of our trusted affiliates and partners using cookies on our Application [here](#) [active link to the GREY LIST above].

## How long do cookies stay on my computer?

Session cookies - these cookies only last until you close your browser. They are not stored on your hard drive. They are usually used to track the pages that you visit so that information can be customised for you for that visit.

Persistent cookies - these cookies are stored on your hard drive until you delete them or they reach their expiry date. These may, for example, be used to remember your preferences when you use the site. The lifespan of such cookies will not exceed twelve (12) months from date of consent.

## What can I do to manage cookies stored on my computer or phone

You can accept or refuse cookies per categories of cookies by clicking [here](#) [active link to OneTrust].

## What happens if I don't accept cookies?

If you decline cookies, some aspects of the Application may not work on your computer or mobile phone and you may not be able to access areas you want on the Application. For this reason we recommend that you accept cookies.