

# PRIVACY NOTICE

Last updated: February 2023

Hennessy is committed to safeguarding your privacy. This notice sets out how we use your personal data.

## 1. Identity and contact details of the data controller

This website (the “Site”) is operated by Jas Hennessy & Co, a French company having its registered address at rue de la Richonne, 16100 Cognac, France, with company number 905 620 035 RCS Angoulême, (“Hennessy” or “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 and the Californian Consumer Privacy Act (CCPA) (or any replacing law, act or regulation regarding Data Protection in force in your country).

Unless otherwise indicated, the Moët Hennessy affiliate (in France or elsewhere) with which you are in contact or which is mentioned in the legal notices on the Site or any other document you may receive, whether in your country of residence or abroad, has the capacity of joint controller with Jas Hennessy & Co.

## 2. How do we use your personal data?

Why do we process your personal data?	What personal data is processed?	On what legal basis is this data processed?	How long is personal data kept?
<b>Cookies</b>	<i>see our cookie policy</i>	<i>see our cookie policy</i>	<i>see our cookie policy</i>
<b>Management of our newsletter mailing</b>	e-mail address subscription date statistics related to the newsletter service Year of birth Country/Region of residence	Your consent	We keep the e-mail address as long as you do not unsubscribe (via the unsubscribe link integrated into the newsletters).
<b>Management of the Site security</b>	Data related to navigation on websites (time stamps, IP address, technical data related to the equipment and browser used by users)	Our legitimate interest to ensure the security of the Site	Six (6) months.
<b>Respond to your requests and inquiries via our contact form</b>	Any information necessary to answer your request	Our legitimate interest to respond to your	For the time necessary according to the

		requests and inquiries	purpose of your request.
<b>Restrict access to the Site to an audience over the legal alcohol drinking age (Age gate)</b>	Country/Region of residence Year of birth	Legal obligation	Five (5) days

**3. Mandatory and optional data**

The collection of the e-mail address, year of birth, country/region of residence is mandatory for the sending of the newsletter. You are deemed to have given your consent when you choose to disclose your personal data by filling in your details on our forms available to you. You can withdraw your consent at any time.

**4. Data transfers**

We do not transfer any personal data outside the European Economic Area ("EEA"), except as follows: depending on your indicated country of residence when subscribing to our newsletter, your data will be processed by the dedicated service in charge of that country (e.g., if you are US resident, our US service will collect and process your personal data).

When personal data is transferred outside the EEA, we take all necessary precautions, alternately or cumulatively: (i) ensure that the European Commission has taken an adequacy decision regarding the country of destination (ii) that standard contractual clauses adopted by the European Commission or the supervisory authority have been signed with the recipient (iii) the recipient has adhered to an approved code of conduct or certification mechanisms or (iv) the recipient has binding corporate rules.

A copy of extracts of these applicable safeguards can be obtained on request (by contacting us as set out below -Section "Your rights").

**5. Recipients of the Data**

In accordance with the regulations in force, your personal data will be accessed by our company's staff and our subcontractors within the strict framework of the purposes that we have presented in this notice and depending on your choice.

**5.1. Accessibility within our company**

In this respect, your personal data is processed by the following departments:

- Our Marketing and Web3 Departments to all processing related to marketing (statistical analysis service);
- Our DPO if you exercise your rights or ask questions about the processing of your personal data;

- Our Security and Legal teams to manage fraudulent acts or legal claims if any.

## 5.2. Accessibility by third parties

Certain third parties will have access to your personal data, specifically:

- **Our affiliates.** Moët Hennessy [affiliates](#), for a limited and defined number of internal recipients to provide you with relevant content and services ;
- **Our marketing providers** Our support and marketing providers (statistical analysis service) ;
- **Our subcontractors, processors and service providers acting for technical and logistical reasons** (website hosting, technical service providers responsible for sending e-mails and newsletters, anti-spam and anti-bot services, etc.).
- **Authorities.** Any authorities, courts or other authorised third parties, where the disclosure of personal data is required by law, regulation or court order, or where such disclosure is necessary for the protection and defense of our rights ;
- **Investors.** We may share some or all of your personal data in connection with or during negotiation of any merger, financing, acquisition, or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, your personal data may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the personal data collected by us and will assume the rights and obligations regarding your personal data as described in this Privacy Policy.

We have signed strict contracts with our subcontractors, in compliance with Article 28 of the GDPR, notably specifying the security objectives to be achieved, to protect your data from unlawful disclosure, use, modification and destruction.

The Site also contains 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 or see their privacy policies:

- [Twitter](#)
- [Discord](#)

## 6. Your rights

### 6.1. Access, rectification, and portability (art. 15, 16 and 20 of the GDPR)

You have the right to **access** your personal data. You may also request **correction** of your personal data should it be inaccurate. Depending on the purpose of processing, you also have the right to have incomplete personal data completed.

In some cases, and to the extent provided for by the GDPR, you may exercise your right to data portability which allows you to retrieve the personal data that you provided to us in a structured and machine-readable form.

### **6.2. Right to request erasure of your data and to restrict processing of your data (art. 17 of the GPDR)**

You may request **erasure** of your personal data if:

- You believe that our processing of your personal data is no longer needed for the purposes described in this Privacy Policy,
- You believe that the processing is unlawful, or you contest the accuracy of the data we process about you,
- You withdrew your consent to the processing of your data.

Alternatively, to the extent provided for by law, you may request restriction of the processing of your data.

Please note that despite the exercise of your right to erasure, or processing restriction, we will retain some of your personal data when the law requires us to do so, or if such retention is necessary to protect and defend our rights.

### **6.3. Right to withdraw your consent**

When the processing of your personal data is based on your consent, you may withdraw your consent at any time without justification. Withdrawing your consent will not affect the lawfulness of any processing already carried out.

### **6.4. Right to object to processing based on legitimate interests (art. 21 of the GDPR)**

You have a right to object to the processing of your personal data when such processing is based on our legitimate interest.

Please note that despite the exercise of your right to object to processing, we may reject your request:

- if such processing is required by law;
- if such processing is necessary to protect and defend our rights;
- if our legitimate interests override your interests;
- if your request is manifestly unfounded or excessive.

### **6.5. Right to establish instructions for the management of your Personal Data after your death (Art. 85 of the French Law n° 78-17 of January 6, 1978)**

You may also establish instructions regarding the retention, erasure and disclosure of your personal data upon your death and modify these directives at any point in time.

### **6.6. Procedure to exercise your Data protection rights**

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

These rights can be exercised at any time by sending a letter or email to the following addresses:

- By mail: "Data Protection Officer (DPO)", 38 rue de Sèvres, 75007 PARIS
- By email: [contactdpo@moethennessy.com](mailto:contactdpo@moethennessy.com).

You also have the right to complain to the [French Data Protection Authority](#) (*Commission Nationale de l'Informatique et des Libertés* or "CNIL"), 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07, about the way we collect and process Your Data.

## **7. California residents' rights (California Consumer Privacy Act (CCPA))**

California residents' rights. If you reside in California and are not a job applicant, employee or employee of another company interacting with us in your job role, you have the right to ask us what information we collect and use. You also have the right to ask what information we disclose and sell. You also have the right to request that we delete information we have collected from you. To exercise your rights contact us at +1 (888) 914-9661 (use the pin 412774 when prompted to submit your request) or [here](#). We will use information you provide to us to verify your request by matching the information you give us with information we already have about you. We will not discriminate against you because you have exercised any of your rights under the California Consumer Privacy Act. You can designate someone else to make a request by having them execute a notarized power of attorney to act on your behalf.

Sales of information. Under California law we are required to tell California residents if we "sell" information as that term is defined by applicable law. Sell means to share personal information with a third party for monetary or other valuable consideration. California residents, we do not do this based on our understanding of that term. We do not have actual knowledge that we sell personal information of minors under the age of 16.

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

Hennessy does not collect any personal data intentionally gather personal data from visitors who are under legal alcohol drinking and/or purchasing age in their location of residence.

If you believe that we might have any personal data from a person who is under legal alcohol drinking age, please contact us.

## **9. Amendments**

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

You should check this page occasionally to ensure you are happy with any changes.