

# **CONFIDENTIALITY POLICY** **AND** **COOKIE POLICY**

## **Data Controller**

**MARIE BRIZARD WINE & SPIRITS FRANCE**, a French company (société par actions simplifiée) registered in the Créteil Trade and Companies Register under number 454 200 064 and having its registered office at 10-12 avenue du Général de Gaulle – 94220 CHARENTON LE PONT, hereinafter referred to as “**MBWS France**”.

## **Definitions**

**Site:** this is the site [www.williampeel.com](http://www.williampeel.com).

**User:** any natural person with or without a personal account using the Site or one of the services offered by it.

## **Collection and purposes of Data Processing**

MBWS France may collect personal data on Users of the Site, in particular through the use of cookies in accordance with the legislation in force.

This data collection is carried out when the User:

- browses the Site and consults articles;
- subscribes to newsletters or alerts offered by the Site;
- contacts the “Consumer” department (“Quality” department), the sales department or the MBWS France Human Resources department by any means of communication made available to it;
- fills out an information form on the Site;
- participates in a contest or promotional game;
- shares an opinion with a friend by sending an email or via social media from a page on the Site.

The data collected are necessary for the following processing:

- personalisation of the content of the Site;
- management and monitoring of relations with prospects (sales department);
- management and monitoring of relations with consumers (Quality Department and Marketing Department);

- management and monitoring of relations with candidates (Human Relations Department);
- implementation of promotional games/competitions:
- provision of sharing buttons to social networks;
- display of targeted advertisements, particularly on social networks;
- production of audience measurement statistics and marketing studies.

### **Recipients of personal data**

The data collected are intended for use by MBWS France.

The data may also be processed by subcontractors used by MBWS France to personalise the content of the Website, to process competition operations and to distribute newsletters.

### **Transfer of personal data outside the European Union**

MBWS France informs the User that its personal data may be transmitted to service providers located outside the European Union as part of the optimisation of its advertising campaigns.

These service providers act in accordance with the European provisions relating to the protection of personal data of the “Privacy Shield” Convention.

### **Rights over your personal data**

In accordance with the French Data Protection Act of 6 January 1978, as amended, Users have the right to access, correct and delete their personal data. The User has the right to request the limitation or to object to the processing of their data by the Site without the Site being able to refuse, unless it can demonstrate the existence of legitimate and compelling reasons that may prevail over the interests, rights and freedoms of the User.

### **Retention period for your personal data**

#### **Personal data of prospects:**

Unless required by law, MBWS France retains your data for a maximum period of 3 (three) years after the last contact.

This period starts from the last contact (sending of a form, email, telephone call) or a click on a hypertext link in an email sent by MBWS France.

Your rights:

You may request to view, rectify or delete your personal data in accordance with the procedures described in the section below "Procedures for accessing my personal data" via:

- a) the website's Contact form, specifying "I wish to contact the Data Protection Officer",
- b) The following email : "dpo@mbws.com
- c) or by post to the following postal address:

MARIE BRIZARD WINE & SPIRITS France  
For the attention of the Data Protection Officer  
10-12 avenue du Général de Gaulle  
94220 CHARENTON LE PONT.

**Personal data of consumers:**

Unless required by law, MBWS France retains your data for a maximum period of 5 (five) years after the last contact.

This period starts from the last contact (sending of a form, email, telephone call) or by clicking on a hyperlink in a letter sent by MBWS France.

Your rights:

You may ask to view, rectify or even delete your personal data in accordance with the procedures described in the paragraph "Procedures for accessing my personal data" via:

- a) the website's Contact form, specifying "I wish to contact the Data Protection Officer",
- b) The following email : "dpo@mbws.com
- c) or by post to the following postal address:

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For the attention of the Data Protection Officer  
10-12 avenue du Général de Gaulle  
94220 CHARENTON LE PONT.

**Personal data:**

Unless required by law, MBWS France retains your data for a maximum period of 2 (two) years after the last contact with our recruiters.

This period starts from the last contact (sending of a form, email, telephone call) or by clicking on a hypertext link in an email sent by MBWS France.

Your rights:

You may request to view, rectify or even delete your personal data in accordance with the procedures described in the paragraph "Procedures for accessing my personal data" via:

- a) the website's Contact form, specifying "I wish to contact the Data Protection Officer",
- b) The following email : "dpo@mbws.com
- c) or by post to the following postal address:

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### **How to access my personal data**

For any request, the User must indicate their surname, first name and postal address as well as an email address to enable them to send a response.

This application must be signed and accompanied by a copy of their valid identity document bearing their signature.

MBWS France has a period of 2 (two) months from receipt of the User's request to respond to it. At the end of this period, the User may contact the CNIL in the event of a negative response or no response from MBWS France.

### **Archiving of data**

Information used to establish proof of a right or contract, or retained in respect of compliance with a legal obligation may be archived in accordance with the legal provisions in force.

### **Fate of personal data after death**

MBWS France informs Users that they can define, during their lifetime, guidelines relating to the storage, erasure and communication of their personal data after their death. These guidelines may be general or specific. The User may change or revoke their instructions at any time.

To do so, the User may contact MBWS France via:

- a) the website's Contact form, specifying "I wish to contact the Data Protection Officer",
- b) The following email : "dpo@mbws.com
- c) or by post to the following postal address:

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### **Definition of Cookie**

A cookie is a small text file that is placed or stored on your device (computer, tablet or mobile device) when you visit a website. The cookie allows a site to recognise you, help you navigate from page to page on your website, provides secure connections and remembers your preferences on future visits.

MBWS France uses cookies in order to recognise the User (customer or not) when logging on to the Website.

### **Cookie management**

The User may, at any time, deactivate the cookies stored on their device.

To do this, they simply select the appropriate settings in their browser. However, this deactivation will prevent access to certain features of the Site offered by MBWS France or its partners.

With regard to the management of cookies and your choices, the configuration of each browser is different. Your browser's help menu describes this configuration, and it will let you know how to change your cookie preferences.

### **Deactivation of cookies via the main browsers**

#### **Google Chrome**

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=fr>

#### **Mozilla Firefox**

<https://support.mozilla.org/fr/kb/activer-desactiver-cookies-preferences?redirectlocale=fr&redirectslug=activer-desactiver-cookies>

#### **Microsoft Edge**

<https://privacy.microsoft.com/fr-FR/windows-10-microsoft-edge-and-privacy>

#### **Microsoft Internet Explorer**

<https://support.microsoft.com/fr-fr/help/17442/windows-internet-explorer-delete-manage-cookies>

#### **Safari**

<https://support.apple.com/fr-fr/guide/safari/sfri11471/mac>

### **Deactivation of cookies via an inter-professional platform**

You can also log into the Youronlinechoices website, offered by digital advertising professionals grouped within the European association EDAA (European Digital Advertising Alliance) and managed in France by the Interactive Advertising Bureau France. This European platform is shared by hundreds of Internet advertising professionals and constitutes a centralised interface allowing you to express your refusal or acceptance of the cookies apt to

be used in order to adapt the advertisements likely to be displayed to your terminal's navigation:

<http://www.youronlinechoices.com/fr/controler-ses-cookies>

MBWS France informs the User that this procedure will not prevent the display of advertisements on the websites you visit. It will only block technologies that allow ads to be tailored to your interests.

### **Deactivation of audience measurement cookies used on the Website**

You can download the browser add-on for deactivating Google Analytics:

<https://tools.google.com/dlpage/gaoptout?hl=fr>

### **Deactivation of social networks**

The Site uses social media plugins such as Facebook, Instagram, Twitter, Pinterest, Youtube, etc. (hereinafter "Social Media"). For example, if the User is connected to Facebook when browsing the Site, Facebook may directly link their visit to their Facebook user account even if the User has not used the share button. If the User interacts using the plugins, for example by clicking on the "Like" button or leaving a comment, the corresponding information will be transmitted and saved on a Facebook server. They will be published on the User's Facebook account.

MBWS France does not manage the data collected by the Social Networks via the buttons. Users must familiarise themselves with the policy on the protection of personal data published by the relevant Social Networks, in order to know the procedures for processing and using the data collected by them as well as the settings available to them to protect their privacy. If the User does not wish the Social Network to link the information collected via MBWS France to his/her Social Network user account, he/she must disconnect from the Social Network before consulting the Website.

### **Security measures taken by MBWS France to ensure the protection of personal data**

MBWS France uses all technical means in accordance with best practice to maintain the integrity, security and confidentiality of data and in particular to prevent it from being distorted, damaged or accessed by unauthorised third parties.