








CAMPARI GROUP

PRIVACY POLICY

This privacy policy provides you with all the information necessary to understand how your personal data will be processed when you access to a website or a mobile application (“**app**”) managed by Campari Group. It also explains how your personal data is used, shared and how you can contact us in case of any need with regards to your personal data.

The type of personal data processed, and the purposes of the processing may vary depending on your choices, consent(s) and the services offered (and used by you) by the website or app which you interact with. For example, the way your personal data is collected will vary if you are interested in participating to an event proposed by one of our brands or if you request to receive a newsletter.

	DATA CONTROLLER	The company belonging to Campari Group that is responsible for the processing of personal data depends on the country you are connected from and how you interact with our websites and apps. In this privacy policy the relevant Campari Group company is referred to as “ Data Controller ”. Please see the section “local companies” below to check which is the relevant Data Controller.
	DATA PROTECTION OFFICER	The Data Protection Officer can be reached at: gdpd.office@campari.com
	CATEGORIES OF PERSONAL DATA	<ul style="list-style-type: none"> • Contact details including name, email, telephone number, shipping and billing address. • Login and account information, including screen name, password and unique user ID. • Other personal details including gender, hometown, date of birth. • Payment or credit card information and purchase history. • Images, photos and videos. • Personal preferences and other information related to you and your personal life. • Technical navigation data (e.g. IP address), in accordance with your cookie preferences.
	DATA SOURCE	The data is provided by you.

 PURPOSE OF THE PROCESSING	 LEGAL BASIS	 DATA RETENTION
Reply to your information request: provide you with the information you have requested through a contact form, e.g. when you make general questions like “where can I find a given product?”.	Legitimate interest.	For the time necessary to process your request or, at maximum, for one year.
Newsletters: send, by e-mail, communications of an informative nature (“Newsletter”) to those who explicitly request it, by entering their e-mail address, name and surname in the appropriate data collection form.	Execution of a (free) contract to which you are a party.	Until you don’t ask to unsubscribe from the newsletter service.
Competitions/Events: allow, with regard to the required data indicated as mandatory(*), the registration to the competition, as well as the management of the organizational activities related to the competition.	Execution of a (free) contract to which you are a party.	One year after the award of the prize. In some countries, we need to retain such information for a longer period due to law requirements.
Direct marketing: contact you for commercial and/or promotional purposes, e.g. by sending you - by automated means of contact (such as sms, mms and e-mail) - promotional and commercial communications relating to the services/products offered by the Controller.	Consent (optional and revocable at any time)	Until you don’t withdraw your consent.
Profiling: perform analysis of your preferences, habits, behaviours, interests inferred, for example, from online clicks on post/contents of Data Controller’s websites and social pages, in order to send you commercial communications personalized and/or carry out targeted promotional actions.	Consent (optional and revocable at any time). A specific consent is acquired only for those countries where the applicable law requires a specific consent to make	Until you don’t withdraw your consent.

	marketing campaigns based on profiling activities.	
Aggregated research: understand customer behaviour and preferences for aggregated research and analysis. For more information, see below “Understand customer behaviour and preferences”.	Legitimate interest.	Until you don't request to object to such processing, i.e. to be excluded by our analysis. Anyway, information acquired on social networks to make statistical reports are updated on a regular basis.
Communication media (subscription): allow the subscription of the disclaimer for the publication of your photographic images or videos.	Execution of a (free) contract to which you are a party.	Duration of the contract and, after termination, for a period required by the applicable law.
Communication media (usage): use, in the manner specified in the disclaimer, the video and/or photographic image shooting.	Execution of a (free) contract to which you are a party.	As they are subject to dissemination, it is not possible to define a data retention period.
Optimize our websites/apps: in order to run our websites/apps we install cookies to optimize the performance and personalize the content.	For the installation of necessary cookies, we rely on our legitimate interest, for the optional ones on your consent.	Retention period depends on the cookie installed (see cookie policy of the website/app).
Process your order: in the websites/apps in which you can purchase our products, we collect your data to correctly process the order.	Execution of a (free) contract to which you are a party.	For the time necessary to comply with applicable financial laws.
Evaluate customer's satisfaction: we collect your data to evaluate our level of services (e.g. competitions, events, product sales) after an interaction with you.	Legitimate interest.	At maximum for one year.
Account: let you create an account on our websites/apps.	Execution of a (free) contract to which you are a party.	Until you don't delete your account.
Legal obligation: fulfilment of obligations to comply with the applicable law (e.g. financial obligations).	Comply with legal obligations.	The period of time required by the applicable law.
We may also use your personal data in other ways and will provide specific notice at the time of collection and obtain your consent where necessary. Once the above retention periods have expired, the data will be destroyed, deleted or anonymized.		



NATURE OF THE PROVISION OF DATA

The data you provide are acquired by us on a voluntary basis. If you refuse to provide us with a necessary information to provide a service requested by you, we will be not in the position to provide such service. Some technical information could be automatically collected when you connect with our websites and apps.

	RECIPIENTS OF PERSONAL DATA	<p>The data may be processed by external parties operating as data controllers such as, by way of example, Authorities and supervisory and control bodies and, in general, parties, including private parties, entitled to request the data, Public Authorities that expressly request the Controller for administrative or institutional purposes, in accordance with the provisions of current national and European legislation, as well as persons, companies, associations or professional firms that provide assistance and advice. Furthermore, when you participate to a competition or event, your data may be published on social media channels (e.g. Facebook, Instagram, YouTube), in accordance with the relevant terms & conditions. As a result, such social media companies are operating as autonomous data controllers.</p> <p>The data may also be processed, on behalf of the Controller, by external subjects designated as Processors of the processing, to whom appropriate operational instructions are given. These subjects are essentially included in the following categories:</p> <ol style="list-style-type: none"> companies offering maintenance services for websites and information systems; companies offering support in carrying out market studies; companies that provide management and maintenance services for the Controller's database; companies offering e-mail services; companies offering management services for the marketing automation platform; companies that provide organizational support and reception services for events. <p>Where third party cookies are installed (with your consent), your data may be processed by third parties to whom the data is communicated.</p>
	DATA TRANSFER	Depending on the Data Controller, your personal data could be processed in different countries. Nevertheless, if the Data Controller has legal offices in Europe, the data will be processed within the European Union.
	DATA SUBJECTS' RIGHTS	You may exercise specific rights on personal data collected by contacting the Data Controller at the following email address: gdp.office@campari.com .
	RIGHT TO CLAIM TO THE SUPERVISORY AUTHORITY	If you think that your personal data has been unlawfully processed, depending on the applicable law, you have the right to lodge a complaint to the competent data protection authority. If the Data Controller has legal offices in the European Union, here is a list of the relevant supervisory authorities.
	AUTOMATED DECISION-MAKING	Personal data collected will not be subject to any automated decision-making techniques that are able to negatively affect you in any way.
	UNDERSTAND CUSTOMER BEHAVIOUR AND PREFERENCES	We use some publicly available personal information to take strategic marketing and communication decisions based on aggregated analysis of customer interests, preferences and behaviour. In fact, we adopt so called "social listening tools" that collect and analyse publicly available information shared by users on social networks. For example, through such tools, we will be able to understand how a given word or hashtag (e.g. #cocktails) is used on social networks and how people react to a post made by us on our social media channels.
	VERSION OF THE DOCUMENT	Last updated: June 2020 Version: 1.0

LOCAL COMPANIES

COUNTRY	COMPANY	ADDRESS
Austria	Campari Austria GmbH	Naglergasse 1/Top 13 ,1010, Wien
Benelux	Campari Benelux S.A.	Avenue de la Météorologie, 10, Bruxelles
France	Société des Produits Marnier Lapostolle S.A.	32 rue de Monceau, 75008 Paris
Germany	Campari Deutschland GmbH	Adelgundenstrasse 7, 80538 München, Deutschland
Greece	Kaloyiannis - Koutsikos Distilleries S.A.	6 & E Street, A' Industrial Area, Volos
Italy	Davide Campari-Milano S.p.A.	Via Franco Sacchetti, 20 Sesto San Giovanni
Italy	Camparino S.r.l.	Piazza Duomo, 21 Milano
Spain	Campari España S.L.	Calle de la Marina 16-18, planta 29, Barcelona

Switzerland	Campari Schweiz A.G.	Lindenstrasse 8, Baar
UK	Glen Grant Ltd.	Glen Grant Distillery, Rothes, Morayshire Elgin Road, trading as Campari UK, Level 27, The Shard, 32 London Bridge Street, London SE1 9SG
Other countries	Davide Campari-Milano S.p.A.	Via Franco Sacchetti, 20 Sesto San Giovanni