

# Introduction

At Gilbert & Gaillard, we are committed to protecting the privacy of our members. community . This means that we protect the personal data of all visitors who access our websites or services through any application, platform or device (collectively, the “Services”). This privacy policy (“Privacy Policy”) explains how Gilbert & Gaillard collects, shares and uses your personal data. You will find also information on how to exercise your rights regarding the protection of your privacy . By using our Services, you consent to Gilbert & Gaillard using your data as described in this Privacy Policy. THE terms "we", "us" or "our" are each intended to refer to Wine Tasting and Trading Ltd. HK.

## Summary

We have summarized the key points of our Privacy Policy below :

### 1. Data about you that we collect and why:

- You will find below the general categories of personal data that we may collect about you and the reasons for such collection:

#### 1.a. Information You Provide Voluntarily.

- Registration information when you create a Gilbert & Gaillard account
- so that we can:
  - Create your account so that you can place Orders under
  - our Terms.
  - Identify you when you log in to your account.
  - To contact you in order to have your point of view on our Services.
  - Notify you of changes or updates to our Services.
  
- Transaction information when you place an Order:
  - Process your Order and invoice you for it (note: Gilbert & Gaillard does not
  - never stores your credit card information in our systems).
  - Respond to your requests and questions regarding your Order and

- solve the problems.
- Carry out analysis and research in order to develop and improve our Services.
- Protect you and the Services by attempting to detect and prevent fraud and other acts that may violate our Terms or policies applicable to the Services.

#### 1.b. Information We Collect Automatically.

- Information relating to the activity so that we can:
  - Provide you with a better experience.
  - Allow You to access the history of your Orders and your preferences.
- Cookies and similar technologies so that we can:
  - Measure and analyze the use and effectiveness of our Services

#### 1 C. Information We Obtain From Third-Party Sources.

- Analytical reports and market studies in order to:
  - Measure the performance of marketing campaigns for our Services
  - Better understand your preferences so that we can personalize our campaigns and Services accordingly.

We process information that you provide voluntarily, information that we collect and information we obtain from third-party sources in order to constantly improve our Services.

#### 2. With whom do we share your personal data?

We may share your personal data with the following recipients (and where where appropriate, we ensure that we have put in place the security and contractual guarantees appropriate to protect them):

- Third parties who support our Services (e.g. partners for marketing or promotions in the wine-growing sectors).
- Any law enforcement or regulatory body, government agency, court or other third party where we believe disclosure is necessary in under applicable laws or regulations.
- Entities with new owners or reorganized in the event of restructuring venture affecting our business.
- Any other person provided that you have consented to it. We will not sell will we distribute or otherwise share your personal data, except if we have obtained your permission.

### 3. Legal basis for the processing of personal data

Gilbert & Gaillard will always make sure to have a legal basis to collect and use your data. The legal basis we rely on will change depending on the type of information and the context in which we collect it. The primary reason for collecting and using your personal data is to perform our contract with you (i.e. ensuring that you can receive your Order when and where you want), but we can also process them when this is in our legitimate business interests.

### 4. International Data Transfers

We may transfer your personal data to countries outside your country of residence, to other countries where Gilbert & Gaillard or our service providers operate. THE data protection laws of these countries may be different from the laws of your country but Gilbert & Gaillard takes care to implement appropriate guarantees in order to protect your personal data in those countries in accordance with this Privacy Policy.

### 5. Security

Gilbert & Gaillard attaches great importance to the protection of your personal data against unauthorized access and unlawful processing, loss, destruction or damage accidental (the). We implement technical and organizational measures to guarantee the security of this information.

### 6. Data retention

Gilbert & Gaillard keeps your personal data for 5 years after the last interaction on our site (update of personal data or transaction) to satisfy the purposes described in this Privacy Policy. We can also keep certain elements of your personal data for a period subsequent to your deleting or disabling your account for our legitimate operations such as keeping and compliance with our legal obligations. When we keep our information , we do so in accordance with applicable law.

### 7. Your data protection rights

You can access your account at any time to view and update your data . You can also contact us to ask us to delete your personal data, limit their processing or request that they be be transmitted to a third party. You can unsubscribe from marketing communications that

you send to us using the "unsubscribe" functionality in any communications we send to you or by changing your profile to consequence.

#### 8. Links to Third Party Sites

Our websites may, from time to time, contain links to or from third-party websites (for example , those of our partner networks, advertisers and affiliates). If you follow these links , know that Gilbert & Gaillard is not responsible for these websites which have their own privacy policies.

#### 9. Updates to this Privacy Policy

We may update this Privacy Policy from time to time in response to legal, technical or commercial changes. We encourage you to review this page regularly in order to see the latest information on our practices of confidentiality.

#### 10. How to contact us

If you have any questions or concerns about this Privacy Policy Confidentiality, do not hesitate to contact us ([vigneron@gilbertgaillard.com](mailto:vigneron@gilbertgaillard.com))

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#### Additional Information

##### 1. Information about you that we collect and why

The information we may collect about you falls into the categories following :

##### 1.a. Information You Provide Voluntarily

Certain parts of our Services may require you to voluntarily provide data. For example :

- Registration information: When you create a Gilbert & Gaillard account, sign or fill in forms on the Services, we collect information you including your name, address, telephone number, address email and the password you create.
- Transaction Information: We collect information about your Orders, including payment information (e.g. your credit card number credit ) using the secure services of our payment processors. THE transactions are entrusted to our payment service providers and we do not store your credit card information in our systems. We collect delivery information (e.g. your physical address) in order to process each Order.

#### 1.b. Information We Collect Automatically

When you access our Services, we may collect certain information automatically from your device. In some countries, including European countries, this information may be considered personal data under the applicable data protection law . For example :

- Activity Information: We collect information about your use of the Services and information about you from content you create and notifications or messages that you post or send as well as your searches , what you watch, and your discussions.
- Cookies and similar technologies: We use cookies and similar technology. tracking to collect and use personal data about you (e.g. your Internet Protocol (IP) address, device ID, type browser and when, how often and how long you interact with the Services), including to facilitate interest-based advertising. For more information on the types of cookies and technologies products that we use, why, and how you can control these technologies , see our Cookies Policy.

#### 1 C. Information We Obtain from Third-Party Sources

We may occasionally receive personal data from sources third parties , including advertising networks but only if we have verified that these third parties have obtained your consent to the processing of the information or are otherwise legally authorized or required to share your personal data with us. This information may include your likely demographic. For example:

- Analytical reports and market research: We collect information from from our third-party affiliates regarding how you respond and react to our marketing campaigns so that we can personalize our marketing and our Services accordingly.
- We may also receive aggregated information in the form of segments from third-party sources in order to display targeted advertisements on digital assets operated by organizations such as Facebook and Google.

## Our Use of Collected Information

We may use this information, for example, in the following ways: To. Information You Provide Voluntarily

- Registration information
  - The registration information you provide when you create a account allow us to give you access to the Services and provide it to you [under our Terms]. We also use these information to authenticate your access to the Services, contact you for Obtain your views and communicate to you any changes or updates days of our Services.
  - The registration information you provide when you create a account can also be used to assign you rewards , communicate them to you and include them in our

various communication media, guides and online guides.

- Transaction Information
  - Information about your transactions allows us to process your Order and send you an exact invoice. They also help us to contact you if necessary.
  - Gilbert & Gaillard can contact you by e-mail or telephone in order to communicate status updates or other information or troubleshoot problems with your account or Order.
  - When you pay for your Order with a service provider of payment , we will send you transaction information via emails or SMS to the email address or number registered with this service provider (since this is required by these providers).

## b. Information We Collect Automatically

When you access our Services, we may collect certain information automatically from your device such as your IP address, MAC address or the device identifier. In some countries, including Europe, this information may be considered personal data under applicable data protection law.

Data protection.

- Cookies and similar technologies

• Like many websites and online services, we use cookies and other technologies to keep a record of your interaction with our services.

Cookies also help us manage a set of options and content as well as storing searches and representing your information at the time of the Order. To get more information about the types of cookies and similar technologies that we use, why, and how you can control these technologies, see our Cookies Policy. vs. Information We Obtain from Third-Party Sources

- Analytical reports and market studies

• We analyze the information we collect from our third-party service providers (such as Google, Facebook and other companies affiliates) to understand how you react to our Services and advertisements (e.g. if you clicked on one of our advertisements). This helps us to understand your preferences and recommend Services to you that comply with your interests.

2. With whom do we share your personal data?

When we provide the Services to you, depending on the circumstances, we may share your personal data with the following entities:

- Companies that are members of the Gilbert & Gaillard group of companies (i.e. our subsidiaries and affiliates, our ultimate parent and its subsidiaries and affiliates). These companies act for us and process your personal data for the purposes set out in this Privacy Policy.
- Third parties who carry out various activities to promote and support our Services. This includes hosting providers, marketing service providers, eCRM partners such as SendInBlue who manage our marketing emails and notifications push, the delivery companies that deliver your Order to you, the research companies market and payment processing providers who process transactions payment by credit card - any of these third parties may be in the country of residence or not.
- If any part of our business decides to incorporate a business joint venture, to buy another company or to be sold to another entity business or merge with it, your information may be disclosed or transferred to the target company, or to new partners or

owners sales representatives or their agents and advisers. In these circumstances, we always inform the entities in question that they must only use your personal data for the purposes set out in this Privacy Policy

Privacy.

- Any law enforcement or regulatory body, government agency or other third party when we believe disclosure is necessary:

- Under applicable law or regulation.
- To exercise, establish or defend our rights.
- To protect your vital interests or those of any other person.

- Any other person provided that you have consented to the disclosure. We don't sell, distribute or rent your personal data unless we have your permission or if we are required to do so by law.

### 3. Legal basis for the processing of personal data

Our legal basis for collecting and using your personal data as above will depend on the specific context in which we collect it. The primary reason for collecting and using your personal data is to perform our contract with you. However, we will also use your personal data where it is in our legitimate business interests (but only if our interests are not overridden by your data protection interests or legal rights and freedoms fundamentals). In some cases, we may have a legal obligation to collect personal data from you (e.g. in the case of legal proceedings) or we may have to process or share it with third parties in order to "protect your vital interests" (it is a legal wording meaning to save your life) or those of another person (eg if another person's life is in danger). If we ask you to provide personal data to comply with an obligation legal or perform a contract with you, we will make this clear at the time question and inform you whether the provision of personal data is mandatory or not (and we will also explain the possible consequences in case of non-compliance). Likewise, if we collect and use your personal data in reliance on our legitimate interests (or those of any third party), we will make it clear to you which are those interests. If you have any questions or need more information about the legal basis on which we collect and use your personal data, contact us [vigneron@gilbertgaillard.com](mailto:vigneron@gilbertgaillard.com)

### 4. International Data Transfers

We may transfer your personal data to countries other than the country in which you reside. Gilbert & Gaillard's website servers are mainly located In France. However, our group companies and our third party service providers and partners operate in many countries,



including China, South Africa, Argentina the USA, Italy, Spain and elsewhere in Europe. Which means that when we collect your personal data we may process in any of these countries. While these countries may have different data protection laws than the laws of your country, you can be reassured, Gilbert & Gaillard takes care to implement guarantees appropriate to protect your personal data in those countries in accordance with this Privacy Policy.

## 5. Security

We attach great importance to the safe and secure storage of your data. personal. We have therefore implemented technical and organizational measures appropriate / industry standard technology to protect them from unauthorized access. authorized and unlawful processing, loss, destruction or damage accidental. The security measures we use aim to provide an appropriate level of security to the risk of processing your personal data. When you have chosen a password allowing you to access certain parts of the Services, you are responsible for keeping this confidential password. We advise you not to share your password with person and to use a unique password for our Services. We will not be responsible for any unauthorized transactions made using your name and password outmoded.

## 6. Data retention

Gilbert & Gaillard will keep your personal data when we need it commercial to do so (for example, while you have an account with us or in order to to enable us to comply with our legal, tax or accounting obligations.) If you object to the processing of certain categories of your personal data (including including regarding the receipt of marketing communications from us), we keep a record of your objection to the processing of your information so that we can continue to respect your wishes.

We will destroy or completely anonymize your personal data when we no longer need to process it for our ongoing legitimate business purposes or to any reason. If this is not possible (for example, because your personal data is stored in backup archives), then we will store them securely an isolate them from further processing until they can be removed.

## 7. Your data protection rights

Gilbert & Gaillard respects your rights to the protection of your privacy and the protection of data. Below is a summary of your rights regarding your personal information. processed by Gilbert & Gaillard :

- Gilbert & Gaillard provides you with the tools allowing you to access, consult or to update your personal data at any time. If you want to request the deletion of your personal data, you can do so by contacting us at using the contact details provided in the “How to contact us” section below.
- You can object to the processing of your personal data, we request restriction of the processing of your personal data or request that they are transferred to a third party. Likewise, you can exercise these rights in us contacting us using the contact details provided in the "How we contact" below.
- You can decide, at any time, to no longer receive communications marketing that we send to you. You can exercise this right by using the unsubscribe functionality regarding communication you receive or modifying your profile accordingly.
- Similarly, if we collect and process your personal data on the basis of your consent, you may withdraw such consent at any time. The withdrawal of your consent will not affect the lawfulness of any processing we have made prior to your withdrawal nor will it affect the processing of your personal data performed on the basis of lawful processing grounds other than your consent.
- You can complain to the data protection supervisory authority regarding the collection and use of your personal data.
- We respond to all requests we receive from people wishing exercise their data protection rights in accordance with the applicable law in data protection

## 8. Links to Third Party Sites

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates or to many websites that may offer useful information to our visitors. We are providing these links to you only as a convenience and the inclusion of a any link does not imply endorsement of the practices of the website in question by Gilbert & Gaillard. If you follow a link to any of these websites, be aware that these have their own privacy policies and that we do not accept any liability for such policies or linked websites. Review these policies before submit any personal data to these websites.

## 9. Updates to this Privacy Policy

We may update this Privacy Policy from time to time in response legal, technical or commercial changes. When we update our Privacy Policy, we will take appropriate measures to inform you, depending on the significance of the changes made. We will obtain your consent to any material changes to the Privacy Policy if and when the right applicable to data protection requires it.

We encourage you to check this page regularly to see the latest information about our privacy practices.

## 10. How to contact us

If you have any questions or concerns about this Privacy Policy Privacy, do not hesitate to contact our privacy team by email to: [vigneron@gilbertgaillard.com](mailto:vigneron@gilbertgaillard.com)