

Distilled Innovation AB, in its role as Data Controller, respects your right to privacy when you use our digital media (such as our websites, our mobile applications, our social media pages) and communicate electronically with us.

The purpose of this Privacy Policy is to inform you how Distilled Innovation AB, a corporation duly organized under the laws of Sweden, with its registered address at S-117 97 Stockholm, Sweden (visiting address: Marieviksgatan 19C S-117 43 Stockholm, Sweden) and its affiliates (together “DIAB”, “we”, “us” or “our”) collect, store, use and process your personal data (“Personal Data”) provided through any digital media operated by DIAB (“Digital Media”).

1. What Personal Data do we gather about you and how do we collect it?

Personal Data is collected only for the purposes set out in Section 3 below and each time you use any of the features or services offered by our Digital Media.

The types and amount of information collected when using the above-mentioned features and services may be updated and vary depending on the activities of DIAB.

Most of the Personal Data we process is directly collected from you, in particular whenever you fill out a form on our Digital Media or contact us. We also collect, with your consent, Personal Data concerning you whenever you browse on our Digital Media through the use of tracking technologies (in this respect see section 2 below as well as our Cookie Policy).

2. How and why do we use tracking technologies?

DIAB uses tracking technologies such as cookies, IP addresses or log files. Tracking technologies help us tailor our Digital Media to your personal needs and offer you content adapted to your interests.

An IP address is a number that is used by computers on the network to identify your computer every time you log on to the Internet. We may keep track of Internet Protocol (IP) addresses to (among other things): (i) troubleshoot technical concerns, (ii) maintain website safety and security, (iii) restrict access to our Digital Media to comply with applicable law or contractual restrictions, and, (iv) better understand how our Digital Media is used.

3. For what purposes do we use your Personal Data and on what legal grounds?

We collect information about you to:

Respond to your request for services or to perform our contract (based on our legitimate interest, to carry out precontractual or contractual measures with you):

– When you register or sign up for our Digital Media (mobile app, websites, social media, etc.), your Personal Data is used to provide you with the relevant features and services you subscribe to, and to offer you the benefits and privileges that typically come with your registration (e.g. being invited to events, participating in a contest, etc.)

– Handle any claims or complaints you make about our products and/or services.

Send you transactional or administrative communications (based on our legitimate interest or to carry out precontractual or contractual measures with you): (e.g. confirmation email when you sign up for, or unsubscribe from, a specific service or feature), as well as certain service-related announcements (e.g., notices about updates to our privacy notices, discontinued features or

programs on our Digital Media, changes to our online services or technical support **policies**, or other related changes).

To fulfil our legitimate interest in better serving your needs:

Manage and track your inquiries and comments, including where relevant regarding compliance, via contact forms or contact email addresses: for the performance of a contract in particular.

4. What happens if you do not wish to provide your Personal Data?

If you choose not to submit any Personal Data when requested, you may not be able to participate in certain activities or take advantage of personalized features, and the Digital Media services and special services offered to you may be limited. For example, if you refuse to share your email address, you will not be able to receive our newsletters or otherwise register on our Digital Media. However, to simply browse our Digital Media and learn more about DIAB and our products, you do not need to give us any Personal Data. In any event, we will always inform you of the Personal Data that is necessary in order to benefit from a service.

5. To whom do we disclose your Personal Data and why?

To affiliates within the Pernod Ricard Group

DIAB may share your Personal Data within the Pernod Ricard Group, including its affiliates worldwide, for the purposes mentioned in Section 3.

To third parties

DIAB may also share your Personal Data with third parties, but only in the following circumstances:

- For support purposes: We may use service providers, agents or contractors to provide support for the internal operations of our Digital Media and to assist us with administering them or the various features, programs and promotions available on it. Any such third party shall at all times provide the same levels of security for your Personal Data as DIAB and, where required, are bound by a legal agreement to keep your Personal Data private, secure and to process it only on the specific instructions of DIAB;

- For litigation and safety purposes: We may also disclose your Personal Data if we are required to do so by law, or if in our good faith judgment, such action is reasonably necessary to comply with legal processes, to respond to any claims, or to protect the security or rights of DIAB, its customers, or the public;

- In the event of a merger or acquisition of all or part of DIAB by another company, or in the event that DIAB were to sell or dispose of all or a part of the DIAB business, the acquirer would have access to the information maintained by that DIAB business, which could include Personal Data, subject to applicable law. Similarly, Personal Data may be transferred as part of a corporate reorganization, insolvency proceeding, or other similar event, if permitted by and done in accordance with applicable law.

6. Is your Personal Data sent to recipients outside the European Union?

DIAB is a global company, and your Personal Data may be transferred across international borders to countries with a different level of data protection than the country from where you submitted your Personal Data. Your Personal Data may also be transferred between different companies of the Pernod Ricard Group located in different countries. DIAB takes the appropriate measures to maintain

security of the Personal Data both during transit and at the receiving location by implementing contractual clauses as set out by the European Commission, in accordance with applicable law.

Our main service providers for the operation of our Digital Media are based in the United States, as are our partners. Transfers of personal data to these service providers and partners are implemented in accordance with applicable laws and rely on standard contractual clauses as set out by the European Commission. Such service providers and partners, when acting as processors, are also bound by a contract that ensures a high standard of privacy protection and requires (amongst other provisions) that they act only on DIAB's instructions and implement all technical measures necessary on an ongoing basis to keep your Personal Data secure.

7. How long do we keep your Personal Data?

We will store the Personal Data that you sent us via our Digital Media in our databases as long as your account is active, for the duration of the contract with you or as needed to provide you the services you requested or to answer queries or resolve problems, or else to provide improved and new services. We may also retain your Personal Data in accordance with our internal retention procedure as necessary to comply with our legal and regulatory obligations, resolve disputes and enforce our agreements. We may thus retain your Personal Data after you stop using DIAB's services or our Digital Media according to the statute of limitations.

8. How do we secure your Personal Data?

DIAB takes all necessary technical and organizational measures to protect the confidentiality and security of your Personal Data collected via our Digital Media. These efforts include but are not necessarily limited to: (i) storing your Personal Data in secure operating environments to which the public does not have access, but only authorized DIAB employees, and our agents and contractors; and, (ii) verifying the identities of registered users before they can access the Personal Data we maintain about them.

9. What are your rights regarding your Personal Data?

If your Personal Data has been processed on the basis of your consent, **you can withdraw your consent at any time**, without impact on lawfulness of processing based on consent before its withdrawal.

You can request access to your Personal Data.

You can request **the rectification of your Personal Data** if it is inaccurate, incomplete or out of date.

You can request the **erasure** of your Personal Data (i) if your Personal Data is no longer necessary for the purpose of the data processing, (ii) you have withdrawn your consent on the data processing based exclusively on such consent, (iii) you objected to the data processing, (iv) the Personal Data processing is unlawful, (v) the Personal Data must be erased to comply with a legal obligation applicable to DIAB . DIAB will take reasonable steps to inform the other entities of the Pernod Ricard Group of such erasure.

You can request **the restriction** of the processing (i) in the event the accuracy of your Personal Data is contested to allow DIAB to check such accuracy, (ii) if you wish to restrict your Personal Data rather than deleting it despite the fact that the processing is unlawful, (iii) if you wish DIAB to keep your Personal Data because you need it for your defense in the context of legal claims (iv) if you have objected to the processing but DIAB conducts verification to check whether it has legitimate grounds

for such processing which may override your own rights if the data processing is based on the legitimate interest of DIAB .

You can request **the portability** of the Personal Data you provided to us, if the Personal Data processing is based on your consent or the performance of a contract and is carried out by automated means (i.e. excluding paper files).

You always have the option not to share any of your Personal Data with us. If you choose this option, you may be limited in the activities and features we can provide you.

You have the right to object to the processing of your Personal Data by us, at any time, if the data processing is based on the legitimate interest of DIAB (except if we can demonstrate compelling legitimate grounds for the processing).

10. How we treat children's Personal Data?

Our Digital Media are not intended for children under the legal drinking age ("Minor"), so we do not knowingly collect personal data from Minors. You must be at least twenty years old to engage in activities and transactions on our Digital Media. If we are notified or learn that a Minor has submitted Personal Data to us through our Digital Media, we will delete such Personal Data.

11. How can you contact us or lodge a complaint with the relevant Supervisory Authority?

If you have any questions, complaints, or comments regarding this Privacy Policy or our information collection practices, please contact us by writing to:

Distilled Innovation AB

DPO, Florence Raynal

S-117 97 Stockholm, Sweden

Visiting address: Marieviksgatan 19C S-117 43 Stockholm, Sweden

or sending an email to: privacy@absolut.com

You are informed that you can also lodge a complaint with the Supervisory Authority of the country where you are located if you have any concern about the conditions of processing of your Personal Data by Pernod Ricard.

12. Changes to our Privacy Policy

We keep our Privacy Policy under regular review and we will place any updates on this web page.

This Privacy Policy was last updated in December 2024.