

VP BRANDS INTERNATIONAL GROUP PRIVACY AND COOKIE NOTICE

This **Privacy and Cookie Notice** provides a high-level overview of our full **Privacy and Cookie Notice** (see section 1 for more information). It summarises important information regarding how we collect, use, and share any personal information collected. This Privacy and Cookie Notice applies to personal information collected by or on behalf of a company within the VP Brands International Group group of companies. **VP Brands International Group** is the world's leading premium drinks business.

1. Introduction

- See section 1 for more information about **VP Brands International Group**.

2. Are you of legal purchase age?

- Do not provide us with your personal information if you are not of legal age to purchase alcohol.
- If we believe that you are under the legal purchase age we will make every reasonable effort to remove your personal information from our records.

3. What information does this Privacy & Cookie Notice apply to?

- This Privacy & Cookie Notice applies to personal information collected by (and on behalf of) VP Brands International Group companies in connection with the marketing and sales of their products.
- We collect personal information online and offline that you choose to provide us with. This includes information provided when registering with our websites, contacting us, completing surveys or questionnaires, entering competitions, and posting information on public areas of our websites as well as through , applications and VP Brands International Group branded pages on third party platforms (e.g. social media platforms) and applications used through our websites and third party platforms ("VP Brands International Group Sites").
- This Privacy & Cookie Notice also applies to offers and advertisements for VP Brands International Group products and services, which VP Brands International Group, or a service provider acting on VP Brands International Group's behalf, may send to you on third party websites, platforms and applications ("Third Party Sites"). These Third Party Sites may have their own privacy & cookie policies and terms and conditions which VP Brands International Group is not responsible for. Please read the privacy & cookie policies and terms & condition of any Third Party Sites before using them.
- This Privacy & Cookie Notice also applies to personal information that we may receive about you from other legitimate third party data sources, including information from commercially and/or publicly available sources, such as data aggregators, public databases and third-party social media platforms.
- See section 5 for details about the types of personal information that we may collect from such sources.

4. What is personal information?

- Personal information is information about an identifiable individual, as defined by applicable law.

5. VP Brands International Group's collection and use of personal information

- Our consumers are at the heart of what we do as a leading premium drinks business. We collect personal data about you in order for us to communicate with you where required, to provide you with our products and services, to understand better your consumer journey to purchase, and to analyse trends amongst our consumers generally, in each case so that we can strive continuously to improve our offering to you, whether content, our services or our products.
- The information that we may (depending on the context) collect from you from VP Brands International Group Sites if you choose to provide it includes your:
 - name
 - contact details (which may include address, email address, user name, telephone number)
 - purchase information (credit card or other payment information, delivery address)
 - Legal purchase age confirmation of your date of birth
 - gender
 - user generated content, posts and other content that you submit to VP Brands International Group Sites
 - any other personal information that you voluntarily provide to us
- When you use this and other VP Brands International Group Sites (including by browsing such sites) some information about your visit is automatically recorded such as the pages you have viewed, your IP address and the date and time of your visit. We also collect information using cookies (see section 6. below for more information).
- The information we collect from other sources includes:
 - name
 - contact details (physical address) or geographic location
 - age (or age range)
 - shopping habits
 - preferences and information about your lifestyle such as your hobbies and interests
 - publicly available information such as user-generated content, blogs, postings, social media user name or ID, social media profile photo, in each case as permitted by law
- All of the information that we collect may be combined to assist us in improving our products, services and our communications with you.
- Note that if you share any of your activity on third-party social media platforms, you will then be subject to the privacy and cookie policies that govern the respective platforms.
- By using this website, you are agreeing to our use of that information as set out in this Privacy and Cookie Notice.
- **If you do not agree to these conditions, please do not provide us with this information or use the VP Brands International Group Sites, or please let us know your objections using the contact details below.**

6. Use of cookies on our websites

We use "cookies" to ensure that we give you the best experience on our website, on our social media pages and to improve our advertising. The use of all cookies is subject to the terms of this Privacy & Cookie Notice and applicable laws and regulations. We also collect information using common Internet technologies such as "clear gifs" (also known as "pixels", "web bugs" or "web beacons").

The types of information collected automatically may include:

- Website cookies to help us gather and store information about our site visitors, including the type of browser & device you use, which VP Brands International Group web pages you have visited, the websites you visited before coming to the VP Brands International Group site and your IP address. Note: we share Site Usage Information with trusted third parties of VP Brands International Group (e.g. advertisers, advertising agencies, advertising networks etc.) in order to offer you tailored content, including more relevant advertising for products or services that may be of interest to you. These third parties may set their own cookies on your device in order to help VP Brands International Group deliver customised content and advertising to you when you visit either VP Brands International Group Sites or Third Party Sites.
- Third party social media and advertising cookies to offer our users social media functions (for example, using your social login to login to our website) and enable us to show you advertisement that you are more likely to be interested in viewing. The social media information collected includes your: user name or handle, social profile picture, age, gender, and any other information you have chosen to share when using Third Party Sites, e.g. when you use the "Like" button on Facebook or retweet on Twitter
- To find out more information about how we use cookies please refer to section 6.

If you continue without changing your settings, we'll assume that you accept the use of cookies in accordance with this Privacy & Cookies Notice. If you do not accept the use of cookies, please refer to section 12 and 13 to find out how to disable cookies.

7. Use of IP addresses

When your web browser or e-mail application requests a web page or e-mail from another computer on the Internet, it automatically gives that computer the address where it should send the information. This is called your computer's "IP address." (IP stands for "Internet protocol.") For most users accessing the Internet from a dial-up Internet service provider (ISP), the IP address will be different every time you log on. We do not store IP addresses in a central database. They are just recorded in log files so they are not associated with an account.

IP addresses may be used for various purposes, including to:

- To identify a person's country access.
- To assist our third party service provider to manage GEO IP location, who may map IP addresses to countries.
- Diagnose service or technology problems reported by our users or engineers that are associated with the IP addresses controlled by a specific web company or ISP.
- Send the most appropriate advertising based on geographic area or information derived from your IP address. Many IP addresses are commonly associated with Internet service providers, universities, or major corporations in specific regions or localities. Aggregate information derived from IP addresses may also be reported to advertisers.
- Estimate the total number of users visiting our websites from specific countries or regions of the world.

- Assist third party advertisers to track effectiveness of the promotions they run on our website, visits to and business at third party's websites.
- Help determine which users have access privileges to certain content that we host.
- Identify whether the IP address relates to a human or non-human ("bot" or "web crawler") as part of an advertisement verification solution to allow us to monitor our digital advertisements across brand safety, ad fraud and viewability measures.

8. Use of personal Information

- We will only use the personal information we collect: for our legitimate business interests, including to improve your consumer experience of our products and services, to provide you with specific information and services that you request, and with additional information and services that may be of interest to you.

9. Disclosure of personal Information

This may involve sharing your personal information with non-VP Brands International Group companies that provide services to VP Brands International Group companies and certain other third parties, but only where they have adequate protection to safeguard and hold your personal information securely and, in certain cases, only where you have provided your consent.

- In some cases, this may involve transferring your personal information to other countries (including the U.K., the U.S., Canada and other countries, inside and outside the European Economic Area) where VP Brands International Group or non-VP Brands International Group companies or other third parties operate and process your personal information. To the extent that we do share your personal information with a service provider, we would only do so if we have entered into a written agreement with that party and that party has agreed to comply with our privacy standards as described in this privacy policy.
- **By providing any personal information to us, you fully understand and clearly consent to such use and transfers as set out in this Privacy and Cookie Notice and our full Privacy and Cookie Notice.**

10. Information you post on public areas of our website & on our Social Media pages

- Information that you post on or through the public areas of the site (e.g. chat rooms, bulletin boards and discussion groups) and our Social Media pages (e.g. on our Facebook and Twitter pages) is publically available information and is generally accessible to, and may be collected and used by others. Please do use caution and do not disclose any personal information, as we do not have any control on how other users may subsequently use your information. Such use by others may be in breach of both our Privacy Policy and of the law, and may place you at risk. We will not be responsible for any postings you make with personal information in them.

11. Security

- We take security seriously and take precautions to keep your personal information secure. We have put in place reasonable technological and organisational procedures to safeguard the information we collect.
- Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us

is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us at the contact details below.

We have no control over the privacy of any communications while in transit to us. We recommend that you not include confidential, proprietary or sensitive information in such communications. See section 16 for more information.

12. Unsubscribe, access, questions and further information

- At your request, and where required by law, we will confirm, share, and/or update the personal information we hold about you. However, to protect your privacy we may first have to verify your identity.
- At any time you can choose to make an **unsubscribe request** to stop receiving direct marketing communications.
- If you would like to unsubscribe from communications from VP Brands International Group or about VP Brands International Group brands, please contact: tnalbantov@vp-brands.com
- See section 17 for more information on your choices..

13. Retention period

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

14. Contact Us

If you have any comments, queries, or complaints about our collection or use of personal information please contact us via:

- **Email:** tnalbantov@vp-brands.com

PRIVACY AND COOKIE NOTICE

1. Introduction

This website is operated by a member of the VP Brands International Group group of companies.

All references to 'our', 'us', 'we', or 'company' within this policy and within the opt-in notice are deemed to refer to VP Brands International Group , its subsidiaries, affiliates, and/or associates, as appropriate.

We endeavour to protect your personal privacy. We provide this Privacy and Cookie Notice to help you to understand what we may do with any personal information that we obtain from you. By providing your personal information to us, you signify your acceptance of our Privacy and Cookie Notice and agree that we may collect, use, and disclose your personal information as described in this Privacy and Cookie Notice. If you do not agree to this Notice, please do not provide your personal details to us. This Privacy and Cookie Notice is incorporated into, and part of, the Conditions of Use that govern your use of the site in general. We will use your information only for the purposes set forth below.

We may need to update this Privacy and Cookie Notice from time to time. We recommend that you check this page regularly to ensure that you have read the most recent version.

2. Legal purchase age

You must not provide us with your personal information if you are not of legal age to purchase alcohol in the jurisdiction in which you reside and (if different) in the jurisdiction in which you are accessing the site. We do not intend to collect personal information from any individuals under the legal purchase age, or to market alcoholic beverages to anyone under the legal purchase age. If we receive notice or believe that someone under the legal purchase age has provided us with personal information we will make every reasonable effort to remove such personal information from our records, or to flag such personal information and (to the extent permitted by law) retain it for the sole purpose of ensuring that it is no longer used.

3. What is personal information?

Personal information is information about an identifiable individual, as defined by applicable law. By 'personal information' we mean names, addresses, email addresses, payment information, and any other personal information you voluntarily provide, for example by entering a competition, completing an online questionnaire, or giving credit card details when purchasing products from us. We also collect some personal information automatically when you browse this website, such as your IP address and details of the pages that you have visited.

4. Collecting personal information

It is your choice to provide us with personal information. In certain instances, we may provide you with the option to select whether you would like to receive information from us or from trusted third parties (for example, by choosing to opt in or opt out of receiving special promotional offers). In some circumstances, you will not have the option to opt out, such as when we are satisfying the obligations of a contract with you, administering a transaction requested by you, or required by law.

You may choose to provide us with personal information if, for example, you: contact us with an enquiry; register on the site; forward an item to a friend; purchase an item; fill out a survey or other form with your personal information included; ask us to provide you with information; enter a competition; post information to public areas of the site; or take advantage of a promotion. In addition to this, we may also collect personal information about you from other legitimate third party data sources, including information from commercially and/or publicly available sources, such as data aggregators, public databases and third-party social media platforms. The personal information we may collect from these other sources may include: name, geographic location, age, shopping habits, user-generated content (such as blogs and social media postings), social media user name or ID, social media profile photo and other social media profile information (such as number of followers), in each case as permitted by law.

By providing any personal information to us, you fully understand and clearly consent to the transfer of such personal information to, and the collection and processing of such information in, other countries or territories. Any such transfer and processing by us will be in accordance with this Privacy and Cookie Notice.

5. IP Addresses

When your web browser or e-mail application requests a web page or e-mail from another computer on the Internet, it automatically gives that computer the address where it should send the information. This is called your computer's "IP address." (IP stands for "Internet protocol.") For most users accessing the Internet from a dial-up Internet service provider (ISP), the IP address will be different every time you log on. We receive IP addresses from all users because this information is automatically reported by your browser each time you view a web page. We do not store IP addresses in a central database. They are just recorded in log files so they are not associated with an account.

IP addresses may be used for various purposes, including to:

- To identify a person's country access.
- To assist our third party service provider to manage GEO IP location, who may map IP addresses to countries.
- Diagnose service or technology problems reported by our users or engineers that are associated with the IP addresses controlled by a specific web company or ISP.
- Send the most appropriate advertising based on geographic area or information derived from your IP address. Many IP addresses are commonly associated with Internet service providers, universities, or major corporations in specific regions or localities. Aggregate information derived from IP addresses may also be reported to advertisers.
- Estimate the total number of users visiting our websites from specific countries or regions of the world.
- Assist third party advertisers to track effectiveness of the promotions they run on our website, visits to and business at third party's websites.
- Help determine which users have access privileges to certain content that we host.
- Identify whether the IP address relates to a human or non-human ("bot" or "web crawler") as part of an advertisement verification solution to allow us to monitor our digital advertisements across brand safety, ad fraud and viewability measures.

6. Cookies

Like many other websites, we use "cookies" to help us gather and store information about visitors to our websites. This notice provides you with information about how we use cookies and how you can control them. By using this website you accept the use of cookies in accordance with this notice. If you do not accept the use of these cookies, please see the section below entitled 'How do I disable/enable cookies?' for further instructions.

A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard disk so that the website can track unique visitors, recognise returning visitors and remember a visitor's preferences. A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a value, usually a randomly generated unique number. Cookies are useful because they allow a website to recognise a user's device.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improving the user experience. They can also help to ensure that adverts you see online are more relevant to you and your interests. You can find more information about cookies at: www.allaboutcookies.org.

7. What types of cookies are used on this site?

We use two broad categories of cookies:

- **First party cookies**, served directly by us to your computer.
- **Third party cookies**, served by a third party on our behalf. We use third party cookies to help us analyse our websites and their uses, and to enable tailored advertising.

8. What do we use cookies for?

Category 1: Strictly Necessary Cookies

These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like shopping baskets or e-billing, cannot be provided.

9. What type of Strictly Necessary Cookies do we use on our website?

Examples of Strictly Necessary Cookies we may use on this website include Content Management Cookies which are required by the site for the content management system to work and Template Preference Cookies which are necessary for mobile sites and enable the site to look and feel the way it is intended to.

We may also use a Social Sharing Plugins and Cookies. The Social Sharing plugin works by linking you with social networking sites such as Facebook and Twitter and allows interaction between your activity on social networking sites and on our website through your direction. For example, using your Facebook username and password to login to our website, and using the Facebook 'Like' and 'Share' buttons on our site. Social Sharing cookies are used to remember that you are logged in to our site.

Category 2: Performance Cookies

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

10. What type of Performance Cookies do we use on our website?

We use Google Analytics and Adobe Analytics to help analyse use of the site. This analytical tool uses cookies to collect standard internet log information and visitor behaviour information in an anonymous and aggregate form. The information about your use of the website and your IP address is transmitted to Google and Adobe and is used by us to evaluate visitors' use of the website, compile statistical reports on website activity and create a profile of aggregated visitors using Google Analytics demographics and interests. We also use Google Display Network Impression Reporting to understand which adverts we place on other websites in the Google Display Network are better at helping us attract visitors to our website. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>. To opt out of being tracked by Adobe Analytics across all websites visit <http://VP Brands International>

Groupgreatbritainltd.d3.sc.omtrdc.net/optout.html?popup=1. For information about how to delete performance cookies, see Section 12.

Category 3: Functionality Cookies

These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

11. What type of Functionality Cookies do we use on our website?

With your consent we may place a cookie to remember your preferences (Preference Cookie) so that you do not need to re-enter your details (country/age and language preferences) on our gateway page. This is not suitable if you share your computer with someone else. This cookie expires automatically after 12 months.

We may also use Session Cookies, which are temporary cookies that aid the user journey around the site, and will remember preferences you have selected during the session. These cookies are deleted as soon as you leave the site.

Category 4: Targeting Cookies or Advertising Cookies

These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation. We also use an advertisement verification solution through a selected service provider to allow us to monitor our digital advertisements across brand safety, ad fraud and viewability to protect our digital investment.

12. What type of Targeting Cookies or Advertising Cookies do we use on our website?

These cookies are used to deliver content that is more relevant to you and your interests based on your previous browsing across the web as well as keywords we may be able to gather from the URLs of webpages from which you accessed this website, your IP address and any search engine used to reach this website. Also these cookies may be used to deliver targeted advertising to you (either within this website or when you visit third party websites) or to limit the number of times you see an advertisement. They stay on your computer unless you delete them and they remember that you have visited a website. By choosing 'accept cookies' on the cookie notice presented to you when entering this website you are consenting to the use of these types of cookies by us for targeted advertising. For details of how to opt out of these cookies please see the section below entitled "How do I opt out of cookie targeted advertising?". How do I disable/enable cookies?




You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of our site if cookies are disabled.

There are a number of ways to manage cookies. Please refer to your browser instructions or help screen to learn more about these functions. For example, in Internet Explorer, you can go to the Tools/Internet options/Security and Privacy Tabs to adapt the browser to your expectations. If you use different computers in different locations you will need to ensure that each browser is adjusted to suit your cookie preferences.

Some modern browsers have a feature that will analyse website privacy policies and allow a user to control their privacy needs. These are known as 'P3P' features (Privacy Preferences Platform).

You can easily delete any cookies that have been installed in the cookie folder of your browser. For example:

How to delete cookies from your Google Chrome browser.


1. On your computer, open Google Chrome.
2. In the top-right, click the Menu .
3. Click Settings  Show advanced settings.
4. In the "Privacy" section, click Content settings.
5. Under "Cookies", click All cookies and site data.
 - To delete all cookies, click **Remove all**.
 - To delete a specific cookie, hover over a site, then click the  that appears to the right.
 - You can also choose to remove all cookies created during a specific time period.

How to delete cookies from your Internet Explorer browser.

<http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>

If you are not using Microsoft Windows Explorer, then you should select 'cookies' in the 'Help' function for information on where to find your cookie folder.

13. How do I opt out of cookie targeted advertising?

If you see any of our advertising with the this logo  on it - you're able to take control of whether you get these types of ads.

This is the AdChoices icon and is a part of the European Interactive Digital Advertising Alliance's (EDAA).

When you click through the Icon, you'll get information about the companies that provide interest-based ads on the sites you visit.

You'll learn about how it works, how this type of advertising supports free content, and about other privacy choices.

If you don't want this type of advertising, you can click through to the consumer choice page to opt out from the companies that participate in the Icon program.

For further information about how to manage or delete targeted/advertising cookies visit - <http://www.youradchoices.com>

14. Use of personal information

We may use personal information collected from you to provide specific services that you request, as well as to provide additional services that may be of interest. For example, we may use your personal information in the following ways:

Marketing Communications. We may use your personal information to communicate with you about our products and services, and those of our subsidiaries, affiliates, and parent companies, and any of their related businesses. You have the right to opt-out at any time from receipt of further marketing communications. You may opt-out by contacting us in accordance with section 10. Unsubscribe, access, questions and further information, below.

Marketing analysis. We may use your personal information for internal marketing analysis, for example, to assess trends amongst our consumers and what people are saying about our products, to evaluate the impact of marketing campaigns, or to measure the amount of traffic to our websites. We may often aggregate information wherever possible so that it is no longer personal information.

Transactional purposes. We may use your personal information to respond to your queries and requests, maintain your accounts, and manage transactions such as credit card payments for any goods that you order from us or our agents, or for the fulfilment of such transactions (e.g., delivery).

Forward to a friend. When you provide us with information regarding another individual, such as when you request that we send someone information from one of our websites, we will send that individual only the information you specifically requested that we send. We will not send them additional communications based on your providing us with their information. You must confirm that your friend is of Legal Purchase Age in the jurisdiction where he/she is located in order for us to transmit the requested information.

15. Disclosure of personal information

We value your personal information and only share it with third parties that provide it with adequate protection. From time to time we may disclose personal information to:

a) third parties to whom you have provided your consent;

b) our service providers and subcontractors, including our affiliates, retained to perform functions on our behalf, or to provide services to us (such as warehousing and delivery; marketing and advertising; credit card and data processing; age verification; software development; website hosting and management; information technology and office services; legal, accounting, audit and other professional service providers; and other services related to our business), provided such service providers and subcontractors have entered into written agreements with us and do not collect, use, or disclose the personal information for any purpose other than to perform such functions on our behalf, to provide services to us, or as otherwise required by law;

c) third parties who, in our reasonable judgment, are providing or seeking the information as your authorized or appointed legal agent; or

d) We will obtain your express permission before we allow a third party that is not an affiliate to send you any marketing and promotional information;

e) a person or entity, including our affiliates, in the event of a sale, merger, consolidation, change in control, transfer of substantial assets, financing, reorganization, or liquidation whereby we transfer, sell, or assign to such third party information concerning your relationship with us, including without limitation, personally identifiable information that you provide and other information concerning your relationship with us; and

f) law enforcement, governmental or regulatory agencies, or other third parties in order to comply with applicable law, or where we believe such action is necessary in order to comply with applicable law, or to detect, protect, or defend us and/or other third parties against error, negligence, breach of contract, theft, fraud, or other illegal or harmful activity, to comply with our audit and security requirements, or to audit compliance with our corporate policies, procedures, legal, or contractual obligations.

Where we transfer your personal information outside the European Economic Area, we will ensure that an adequate level of protection is in place to protect your personal data.

16. Public areas of our websites

Information that you post on or through the public areas of the site (e.g., chat rooms, bulletin boards, discussion groups), or on Social Networking sites generally is accessible to, and may be collected and used by, others, and may result in unsolicited messages or other contact from others. You should not provide personal information about yourself in public (or interactive) areas of this site or on Social Networking sites. Such personal information is not covered under this Privacy and Cookie Notice.

17. Security

We take security seriously and take precautions to keep your personal information secure. We have put in place reasonable physical, technical, and organisational procedures to safeguard the information we collect. However, we have no control over the privacy of any communication while it is in transit to us. We therefore recommend that you not include confidential, proprietary, or sensitive information in any such communications.

Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us at the contact details below. In the unlikely event that we believe that the security of your personal information in our possession or control may have been compromised, we may seek to notify you of that development. If such a notification is appropriate, we will endeavour to do so as promptly as possible under the circumstances, and, to the extent we have your email address, we may notify you by email.

You are reminded that, in accordance with the Conditions of Use for this website, which include this Privacy and Cookie Notice, you are responsible for maintaining the strict confidentiality of your account password, and you are responsible for any activity under your account and password. It is your sole responsibility to control the dissemination and use of your password, control access to and use of your account, and notify us when you wish to cancel your

account. We will not be responsible or liable for any loss or damage arising from your failure to comply with this obligation.

18. Unsubscribe, access, questions and further information

At your request and where the law requires us to do so, you may contact us (using the unsubscribe details provided below) and we will confirm what personal information we hold about you, update your information, remove your information, fulfil specific opt-out requests (including requests where you previously opted in with respect to the use of your personal information), and/or correct any inaccuracies in such personal information. You may also have the right to obtain a copy of all personal information we hold about you.

19. Retention period

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

If you would like to unsubscribe from this communication, or from all communications about VP Brands International Group brands, please contact: [Privacy.Queries@VP Brands International Group.com](mailto:Privacy.Queries@VPBrandsInternationalGroup.com)

20. Portfolio permissions

If you have given permission to receive communications about VP Brands International Group brands generally (for example, by opting to receive news and special offers by email about VP Brands International Group's other great alcohol brands), you may from time to time receive communications about brands to which you have not opted in specifically. Information about many of VP Brands International Group's brands can be found at [www.VP Brands International Groupbrands.com](http://www.VPBrandsInternationalGroupbrands.com).

We occasionally may send you communications about brands not featured on [www.VP Brands International Groupbrands.com](http://www.VPBrandsInternationalGroupbrands.com) (e.g., new brands). We recommend that you refer to [www.VP Brands International Groupbrands.com](http://www.VPBrandsInternationalGroupbrands.com) from time to time as the list of featured brands will be updated periodically.

Providing general permission for us to communicate with you about our brands does not mean that you will receive communications about all of VP Brands International Group's brands. We will only communicate with you about those brands that we think may be of particular interest to you. Any such communications will provide you with an opportunity to unsubscribe from the brand in question and/or from all communications about VP Brands International Group brands.

If you have any privacy-related questions, concerns or complaints, please contact: Data Privacy Officer, Global Compliance Legal Team, VP Brands International Group plc, Lakeside Drive, London, NW10 7HQ, United Kingdom or [Privacy.Queries@VP Brands International Group.com](mailto:Privacy.Queries@VPBrandsInternationalGroup.com)

21. Interfaces with Third-Party Websites

The site may contain links, references, and content from other websites outside of our control. Please be aware that we have limited or no control over these websites and our Privacy and Cookie Notice does not apply to these sites. We encourage you to read the Privacy and Cookie Notices and Conditions of Use of any linked, referenced, or interfacing websites you enter.

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