

Consumer Privacy Notice

We take the privacy of our consumers seriously. This notice tells you who we are, what information about you we collect, and what we do with it. We will process information about you only in accordance with applicable laws.

This is a global notice and explains our general practices. Where local laws or regulations require that we process information differently, or refrain from such processing, we will always comply with applicable local law. For national variations, see the section below called “country-specific additional points”. For anything not contemplated by this notice, we may issue a supplemental notice. You should read any supplemental notice in conjunction with this notice.

In the section introduced as “What rights and options do you have?”, you can also find information about your rights.

Who are we?

We are an affiliate member of the Aspeya group of companies, which is a part of the Philip Morris International (PMI) group of businesses.

Our details (name, address, etc.) will have been given to you separately at the time of (or to confirm) the collection of information about you, for example, in a notice, on a website, or in an e-mail containing a link to this notice.

A list of entities that may be delivering this notice to you can also be found [here](#) along with relevant contact points and details of our data protection officer where applicable. Please use these details if you wish to contact us in relation to the processing of your personal data.

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- “We” (or ‘us’ or ‘our’) refers to our affiliate that first collected information about you.
- ‘Aspeya product’ means a product of Aspeya or one of our affiliates.

How do we collect information about you?

We may collect information about you in various ways.

You may provide us with information directly (e.g. filling in a form, making a call to us, or uploading information to us via website).

We may collect information automatically when you interact with our systems or we communicate with you (e.g. when you use our website or where we use technologies to observe when you receive or open e-mails or receive SMS messages).

We may also collect information from third parties (e.g. publicly-available information, information on social media platforms such as Meta and X). For example, where permitted by law, we may infer information about you from aggregated information we acquire from third parties. By way of example, this may include statistical information about people in certain geographical areas.

In this notice, we refer to all the methods by which you are in contact with us as “Aspeya touchpoints”. Aspeya touchpoints can include physical touchpoints (for example, events (these include events arranged by Aspeya and third party events at which Aspeya is present), consumer contact centres), and digital touchpoints (for example, social media and websites).

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We may collect information that you provide directly. Typically, this will happen when you:

- sign up to be a member of our databases (including loyalty programs), which may include performing age verification;
- request information about our products, which may include age recognition;
- purchase Aspeya products or services;
- use an Aspeya digital touchpoint (e.g. a website);
- contact us through a touchpoint, or by e-mail, social media or telephone;
- subscribe to an Aspeya panel portal;
- register to receive Aspeya press releases, e-mail alerts, or marketing communications or other promotional materials;
- participate in surveys or (where permitted by law) competitions or promotions; or
- attend an event that an Aspeya affiliate has organised.

We may collect information about you automatically. Typically, this will happen when you:

- visit an outlet that sells Aspeya products (for example, by collecting your data at check-out);
- attend an event that our affiliate has organised (for example, through purchases at the event);
- communicate with us (for example, through a touchpoint, or social media platforms);
- use Aspeya digital touchpoints for example, through tracking mechanisms (such as cookies, web beacons/pixels and other tracking technologies such as device identifiers);
- use third party websites (for example, using technology similar to that described in the bullet above);
- make public posts on social media platforms that we follow (for example, so that we can understand public opinion, or respond to requests concerning Aspeya products); or
- are referred to us by another consumer of Aspeya products.

As mentioned above, we may collect information about you automatically through the use of cookies and similar tracking technologies if you agree to (or do not opt out of) their use when you visit Aspeya digital touchpoints. The specific cookies and other tracking technologies used will depend on the touchpoint in question. To learn about the mechanisms used on a particular Aspeya touchpoint, including how you can accept or refuse them, please see the information made available on or through that touchpoint. You should review the privacy notice of these providers to see how they process personal data about you. These mechanisms may include Google analytics cookies (see www.google.com/policies/privacy/partners/).

We use these cookies and other tracking technologies to conduct digital personalized advertising that is relevant to you, using various partners. This may involve matching the email addresses and mobile phone numbers that we hold for you with the email addresses of our advertising partners, to show you the most relevant digital advertisements (where permitted by law). We only do this where you have given us consent for (or have not opted out of) data sharing according to applicable law. Sometimes we may also process information about you to build lookalike profiles. This allows us to generate similar audiences for prospective customers (who may have similar interests or demographics to you) through advertising platforms like Google, based on data that the advertising platform holds about other people. Usually this means sharing your email address with our advertising partners.

In addition, where permitted by law, we may acquire information about you from third parties. This may include information shared between Aspeya affiliates, publicly available profile information (such as your preferences and interests) on third party social media sites (such as Facebook and X), marketing lists and supplementary information acquired from third party agencies. For such data, Aspeya may act as an independent controller in certain cases, or a joint controller with the third party in relation to these processing activities.

Where you log in to your account using a social media account (e.g. Facebook, Google, etc.) we have no control or influence over the data that social networking site collects via that plugin or link. For more information, please consult the relevant data privacy notice of these third parties.

We may also collect information in other contexts made apparent to you at the time.

What information about you do we collect?

We may collect various types of information about you such as:

- information about your orders, including information necessary to fulfil them
- information about the referrals you make
- information you give us in forms or surveys, and similar information that you give to third parties to be transferred to us
- information about your location, where you choose to share it with us (for example, on your mobile phone)
- information about your visits to our events (or events of others with whom we work)

- information you give us in communications (e.g. letters, calls, chats, e-mails, SMS and instant messages)
- information about your preferences and interests (including information that we infer from other information, for example from statistical information)
- information necessary to verify your age
- information about your experience of using our products and services
- statistical information about you (for example, statistical information about people in certain geographical areas)
- information that may relate to adverse events (such as any unwanted health effect when using one of our products when you report them to us)
- information about you that we acquire from third parties, where you agreed that the third party can share your data with others.

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Information that we collect from you directly will be apparent from the context in which you provide it. For example:

- if you order a product from us through a touchpoint, you provide your name, contact, billing details, payment methods, and the products you have chosen so that we can fulfil your order;
- you may provide information on your product preferences, interests and experience so that we can offer you products and services that will interest you, and to improve our products and services;
- if you make an appointment to see us (or someone supporting our products or services), we may collect your name and contact details;
- if you communicate with one of our contact centres, you may give us information, for example about your experiences using our products and services, to allow us to deal with your requests.

Information that we collect automatically will generally concern:

- details of your visit or call (such as time, date, and duration);
- audio or video recordings (where permitted) of your calls or visits to Aspeya touchpoints, which we may transcribe to text format;
- your visits to sales outlets or participation at events (including areas in the immediate vicinity), how frequently you visit, which areas you visit and for how long, and which purchases you make;
- your use of Aspeya digital touchpoints (such as the pages you visit, the page from which you came, and the page to which you went when you left, search terms entered, or links clicked within the touchpoint, when you first open the touchpoint, for how long you use it, and how you interact with messages we send you or advertisements we show you); we may use cookies and similar tracking technologies (such as pixels/web beacons) to do this;

- your use of third-party websites, where the information collected will be similar to that described in the bullet above (we may use cookies and similar tracking technologies (such as pixels/web beacons) to do this);
- your mobile or desktop device and software (such as your IP address or unique device identifier (for example, mobile advertising identifier (MAID) or Android ID (SSAID)), location data (either your general location (derived from your IP address, in which case the information we have will be general, e.g. the town you are in), or your precise location (if you choose to share it with us for specified purposes, e.g. store locator)), the display settings of your monitor, web browser type, operating system, (some of which may be used in “digital fingerprinting” (see for what purposes we process information about you, below)) and details of any cookies (or similar technologies) that we may have stored on your device);
- Where permitted by law, we may infer information about you from information about you that we already have. For example, we may analyse your interactions with us to conduct segmentation and profiling to improve our products and services, customize our offers and communications to you, or we may use aggregated information about people in certain geographical areas, that we acquire from third parties, to infer your preferences.

Information that we collect from third parties will generally consist of publicly available information (such as your preferences, interests and experiences), for example from public social media posts.

For what purposes do we use information about you, and on what legal basis?

In this section, we describe the purposes for which we use personal information. However, this is a global notice, and where the laws of a country restrict or prohibit certain activities described in this notice, we will not process information about you for those purposes in that country.

Subject to the above, we process information about you for the following purposes:

- To comply with regulatory obligations, such as verifying your age, reporting data related to adverse events.
- To sample or sell our products to you, including fulfilling your orders and processing your payments
- To provide sales-related and product support services to you, including dealing with your inquiries and requests, and providing support services including personalized support and insights on the use of our products

- To market our products and services (where permitted by law), including administering loyalty programs and referral programs, product improvement, market research (including demonstrating fair practices in market research), developing marketing strategies, creating personalized offers and communications, administering marketing campaigns, creating and executing targeted digital advertising on websites that you visit or to build lookalike audiences to target prospective customers (who may have similar interests or demographics to you), customizing your interactions and experience with us, customizing the content of messages we send to you or advertisements or marketing we show you
- To understand whether you are still engaged with our marketing and whether you wish to continue to receive it
- For us or our business partners to inform you of potential opportunities to get involved in marketing or promoting Aspeya products
- To enable you to use, and improve your experience of, Aspeya touchpoints
- To support all the above, including administering your accounts, corresponding with you, managing your appointments with us or with someone supporting our products or services (for example, regarding a new product, or after-sales service), customizing your experience of Aspeya touchpoints, fraud prevention (for example in the context of our loyalty programs, promotions, competitions and surveys, to ensure that they are not taken more than once by the same person, or in the context of e-commerce to protect cardholder and account information), personnel training and quality control, and administration and troubleshooting
- For business analytics, statistical or scientific purposes, including improving Aspeya products and services, outlets and events, and the information that we (or our affiliates) provide to you
- For other purposes that we notify you of, or will be clear from the context, at the point information about you is first collected

The legal basis for our use of information about you is one of the following (which we explain in more detail in the “More Details” section):

- compliance with a legal obligation to which we are subject;
- the performance of a contract to which you are a party;
- a legitimate business interest that is not overridden by interests you have to protect your data;

where none of the above applies, or where the law requires it, your consent (which we will ask for before we process the information).

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The purposes for which we process information about you, with corresponding methods of collection and legal basis for use, are:

Purpose	Method of collection and legal basis for processing
<p>Comply with regulatory obligations</p> <ul style="list-style-type: none"> • verify your age • report adverse events related to our products 	<p>This information is generally provided to us by you directly.</p> <p>We use it because it is necessary for us to comply with a legal obligation to sell products only to adults and to monitor the safety of our products, or, in countries where there is no such legal obligation, because we have a legitimate business interest to sell our products only to adults and ensure the safety of our products that is not overridden by your interests, rights and freedoms to protect information about you.</p>
<p>Sell our products</p> <ul style="list-style-type: none"> • fulfil your orders (including sending receipts) • process your payments 	<p>This information is generally provided to us by you directly (typically, name, address, e-mail address, payment information).</p> <p>We use it to discharge our contractual obligations to you as a buyer of our products.</p>
<p>Provide sales-related and product support services</p> <ul style="list-style-type: none"> • deal with your inquiries and requests, and information about your experience with our products and services • correspond with you • general administration and troubleshooting • administer loyalty programs 	<p>This information is generally provided to us by you directly but may be combined with information that we collect automatically (for example, using technology such as cookies and web beacons/pixels) to monitor your use of Aspeya touchpoints and e-mails from us), and using similar technology to monitor your use of third party touchpoints; and (where permitted by law) information that we acquire from third parties (such as public social media posts).</p> <p>We use it because we have your consent to do this (these cases will be clear from the context); or we have a legitimate business interest in providing sales-related and product support services to our customers that is not overridden by your interests, rights and freedoms to protect information about you.</p>

<p>Market our products (where permitted by law)</p> <ul style="list-style-type: none"> • understand your preferences (such as what products or events may interest you or may be better tailored to your needs) and, where permitted by law, market to you personally • understand whether you are still engaged with our marketing and whether you wish to continue to receive it • administer loyalty and referral programs • invite you to participate in, and administer, surveys or market research campaigns • for market research, and for demonstrating fair market research practices • develop marketing strategies • administer marketing campaigns • customize your experience with Aspeya • provide you with information about and manage our promotions, products and services, outlets, events and the regulation of our products • customize your marketing experience with us, for example with customized messages and offers we send you, or advertisements we show you • allow us or our business partners to inform you of potential opportunities to get involved in promoting Aspeya products or any regulatory changes that may affect our ability to provide you with certain products • develop and improve tools to pursue these purposes 	<p>This will typically be a combination of information that you provide to us (for example, your name and contact and social media details); information that we collect automatically (for example, using technology (such as cookies and web beacons/pixels) to monitor your use of Aspeya touchpoints and electronic messages (e.g. e-mails and SMS) from us), and using similar technology to monitor your use of third party touchpoints to conduct targeted paid media and programmatic paid media to effectively reach and engage with you. Paid media involves purchasing advertising space on publishing platforms such as social media platforms, search engines, and third-party websites; and (where permitted by law) information that we acquire from third parties (such as public social media posts).</p> <p>We use it on the grounds that either:</p> <ul style="list-style-type: none"> • you have provided your consent to do this (these cases will be clear from the context); or • we have a legitimate business interest to market our products, to operate Aspeya touchpoints, to customize your experience, and to understand whether you wish to continue to receive our marketing that is not overridden by your interests, rights and freedoms to protect information about you.
<p>Use of Aspeya touchpoints</p> <ul style="list-style-type: none"> • To enable you to use, and improve your experience with and usage of Aspeya touchpoints 	<p>This information, if you choose to send it to us, will be sent to us either directly, via one of our digital touchpoints or via the various retailer touchpoints.</p> <p>We use it because we have your consent to do this (these cases will be clear from the context) or because we have a legitimate business interest to provide you with support for Aspeya touchpoints, which is not overridden by your interests, rights and freedoms to protect information about you.</p>

<p>Supporting our relationship with you</p> <ul style="list-style-type: none"> • administering your accounts • enabling you to use Aspeya touchpoints (for example, allowing you to remain logged in to sections of a touchpoint that are reserved for authorized users only, administering your language preference, associating your shopping cart with you, enabling certain features of the Aspeya touchpoint, (where you choose to share your location)) • corresponding with you • managing your appointments with us or with someone supporting our products or services (for example, regarding a new product, or after-sales service) • enhancing your experience • fraud prevention (for example in the context of our promotions, competitions and surveys, to ensure that they are not taken more than once by the same person, or in the context of e-commerce to protect cardholder or account information) • personnel training and quality control (including using transcriptions of recordings of calls to contact centres to produce aggregated insights), and administration and troubleshooting 	<p>This will typically be a combination of information that you provide to us (typically, name, password (or equivalent)) and information that we collect automatically (for example, information about your device, and cookies and similar tracking technologies, and (where permitted) recordings of your calls (and transcriptions of those recordings) or visits to Aspeya touchpoints).</p> <p>We use it on the grounds that correspond to the purpose of using the information that we are supporting. For example, where we administer your account to support a purchase or to provide after-sales service, we use the information to discharge our contractual obligations to you as a buyer of our products; where we administer your account to show you our products, we are supporting marketing and so we use it on the grounds that we have a legitimate business interest to market our products that is not overridden by your interests, rights and freedoms to protect information about you.</p>
<p>Business analytics and improvements</p> <ul style="list-style-type: none"> • For business analytics, statistical or scientific purposes, including for improving Aspeya products services, outlets that sell Aspeya products, events, Aspeya digital touchpoints and the information that we (or our affiliates) provide to our customers 	<p>This will typically be a combination of information that you provide to us (such as information from your communications with Aspeya touchpoints; or demographic information, e.g. your age, gender and the city where you live); information that we collect from your electronic device; information that we collect automatically; and (where permitted by law) information that we acquire from third parties. Where we have more than one type of data from these categories, we may combine them to improve our analysis.</p> <p>We use it because we have your consent to do this (these cases will be clear from the context); or because we have a legitimate business interest to analyze and to improve our business performance, our products, Aspeya touchpoints, events, that is not overridden by interests, rights and freedoms to protect information about you.</p>

Where we do not base our use of information about you on one of the above legal bases, or where law requires it, we will ask for your consent before we process the information (these cases will be clear from the context).

Where this is the case, we will provide a supplemental privacy notice that explains such use. You should read any supplemental notice in conjunction with this notice.

Do we use Artificial Intelligence (AI) and Machine Learning (ML)?

We may use artificial intelligence (AI) features to enhance your consumer experience. By way of example, the digital touchpoint may include a conversational chatbot, supported by AI features, that answers frequently asked questions and assists you with navigating the portal. The chatbot can help you search for products, manage your account, and provide support.

Additionally, we may use AI features, such as machine learning and statistical algorithms, to support the analysis of your behaviors and interactions with Aspeya touchpoints and conduct segmentation and profiling, where permitted by law. This helps us understand and enhance your experience, improve our products and services and tailor them to provide you with personalized experience. By way of example, these AI features analyze various data points, such as purchase history, browsing behavior, and demographic information, to determine, based on similarities between consumers' patterns and behaviors, which segment you may belong to and allow our teams (human intervention) to use this information to undertake relevant and personalized actions that are most relevant to you.

We may also use AI capabilities to assist us in preventing fraudulent actions.

Lastly, we may also use AI features in our interactions with you to support customer care services, improve their efficiency (including your satisfaction with these services) and quality reviews of customer care interactions. This helps us to measure your customer experience, provide the best possible customer care support and identify areas for improvement. For example, by analyzing such interactions, we can better understand common issues and trends, leading to higher customer service and satisfaction.

Who do we share your information with, and for what purposes?

We may share information about you with:

- Companies in the Aspeya group of companies; its owner, Philip Morris Inc. and its affiliates;
- Third parties who provide our affiliates or you with products or services;
- Our affiliates' carefully selected business partners and advertisers (in areas connected with our products) so that they can contact you with offers that they think may interest you, in accordance with your preferences; and
- other third parties, where required or permitted by law.

We share information about you with others only in accordance with applicable laws. Thus, where the law requires your consent, we will ask for it before sharing your data.

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Sharing data with our affiliates

- We may share your personal data with the other PMI group entities which are responsible for coordinating personal data processing for our affiliates. Acting as a data controller, these entities process your information for the purposes specified in this notice, for example, to improve our products and services.
- Information about you may be shared with the Aspeya or PMI affiliate established in the country in which you live (if it wasn't the affiliate that first collected the information) for the purposes described in this notice.
- Information about you may be shared with other Aspeya or PMI affiliates that you contact (for example, if you travel and you want to know where to buy Aspeya products in a new country, or where to find service or support for Aspeya products) in order to enhance our services to you.

Sharing data with Third Parties

- To the extent permitted by applicable law, we may share information about you with third parties who provide our affiliates or you with products or services (such as payment service providers, delivery providers, retailers, market research agencies, information services providers).
- To the extent permitted by applicable law, we may share information about you with carefully selected third party business partners and advertisers (in line with the kind of thing you might associate with our products, for example because they have similar or complementary image, style, or functionality) so that they can contact you with products, services and promotions that they think may interest you, in accordance with your preferences.
- We may share information about you with other third parties, where required or permitted by law, for example: regulatory authorities; government departments; in response to a request from law enforcement authorities or other government officials; when we consider disclosure to be necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity; and in the context of organisational restructuring.

Where might information about you be sent?

As with any multinational organisation, we transfer information globally to our affiliates and service providers. Your data may therefore be transferred to other countries as part of our standard operations. Whenever we transfer your data abroad, we will limit access to your data only to those who need to see it, process your data in accordance with our internal data protection standards, protect it appropriately and only transfer information in compliance with applicable data privacy laws. When data is transferred, we will require the receiving party to keep your data confidential, delete it when it is no longer required and act in accordance with this privacy notice. Accordingly, information about you may be transferred outside of your jurisdiction. For example, if you live in the EEA, UK, Australia or Japan, your data may be processed in another country.

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When using information as described in this notice, information about you may be transferred either within or outside the country or territory where it was collected, including to a country or territory that may not have equivalent data protection standards.

For example, we and our other affiliates within the EEA may transfer personal information to PMI group affiliates, or to their service providers, outside the EEA. In all such cases, the transfer will be:

- On the basis of law (e.g., a European Commission adequacy decision), subject to appropriate safeguards (e.g. the EU Standard Contractual Clauses or binding corporate rules); or
- with your consent or
- as necessary to discharge obligations under a contract between you and us (or the implementation of pre-contractual measures taken at your request) or for the conclusion or performance of a contract concluded in your interest between us and a third party, such as in relation to travel arrangements.

For transfers from Switzerland and the UK, in accordance with the Federal Act on Data Protection and UK GDPR and guidance of the Federal Data Protection and Information Commissioner and Information Commissioner's Office. In all cases, appropriate security measures for the protection of personal information will be applied in those countries or territories, in accordance with applicable data protection laws.

How do we protect information about you?

We implement appropriate technical and organisational measures to protect personal information that we hold from unauthorised disclosure, use, alteration or destruction. Where appropriate, we use encryption and other technologies that can assist in securing the information you provide. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we use reasonable means to protect your information, we cannot guarantee its absolute security or confidentiality.

Where we have given you (or where you have chosen) a password which enables you to access any portal or account, you are responsible for keeping this password confidential. We ask you not to share your password(s) with anyone.

If you suspect any misuse or loss of or unauthorised access to your personal information, please let us know immediately. Please raise your concern by contacting us in the first instance, and we will investigate the matter and update you as soon as possible on next steps.

We do not knowingly collect, solicit, or store personal information from individuals under the legal age in their respective provinces or territories. If we become aware that we have collected personal information from someone under the legal age, we will delete that information immediately.

How long will information about you be kept?

We will retain information about you for the period necessary to fulfil the purposes for which the information was collected in accordance with our internal data retention

standards. After that, we will delete it. The period will vary depending on the purposes for which the information was collected. Note that in some circumstances, you have the right to request us to delete the information. Also, we are sometimes legally obliged to retain the information, for example, for tax and accounting purposes.

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Typically, we retain data based on the criteria described in the table below. Where these periods conflict with legal obligations, for example, for tax and accounting purposes, to either retain the information for a set minimum period of time, or to delete it after a set maximum period of time, we apply those set periods instead.

Type	Explanation/typical retention criteria
Marketing to you (including marketing communications) (if you use digital touchpoints and are contactable)	Most of the information in your marketing profile is kept for the duration of our marketing relationship with you; for example, while you continue to use digital touchpoints, or respond to our communications. However, some elements of your marketing profile, such as records of how we interact with you, naturally date and may be inaccurate after a period of time, so we delete them automatically after defined periods (typically 3 years) as appropriate for the purpose for which we collected.
Marketing to you (including marketing communications) (if you are no longer in contact with us)	If we don't have any contact with you for a long period (typically 3 years), we will stop sending you marketing communications and typically data are deleted or anonymised. This will happen, for example, if you do not click through to an invitation to an event, log on to a digital touchpoint, or contact customer care, during that 3-year period. The reason is that in these circumstances, we assume you would prefer not to receive communications from us.
Marketing to you (including marketing communications) (if you are not contactable)	If you have registered to receive marketing communications, but the contact information no longer works, we will retain your details for a period of time (typically 1 year) to allow you to return and correct it.
Marketing to you (including marketing communications) (incomplete registrations)	If you commence registering yourself in a database, but do not complete the process (for example, if you do not complete the age verification process, or you do not accept the touchpoint's terms of use), we will retain your details (to allow you to return and complete the process) for up to 30 days, depending on the type of information that is missing.

Market research	<p>If you are not registered with us for other purposes (e.g. marketing communications, customer care), and we use publicly available information about you in order to understand the market or your preferences, we will retain information about you for a short period of time in order to perform the particular market research activity.</p> <p>If we collect information about you in other market research contexts, we will retain that information:</p> <ul style="list-style-type: none"> • for the purposes of the individual item of market research for the period reasonably required (typically no longer than 1 year); and • for the purposes of demonstrating fair practices, for so long as we need to be able to demonstrate that, and we will regularly review whether that purpose has been achieved to determine whether the retention is still required.
Purchases, loyalty transactions and warranty	<p>If you purchase goods or perform a loyalty transaction, we will retain details of this for so long as required to complete the sale, and to comply with any legal obligations (for example, for tax and accounting record-keeping purposes and fraud-prevention purposes).</p>
Customer care	<p>If you contact customer care, we will maintain a record of the interaction (including details of your enquiry and our response) and retain it while it remains relevant to our relationship, for example if you need us to replace a defective product, or if your recent enquiries are relevant. Temporary records (for example, an automated recording of a telephone call in which you ask us to direct you to a retail outlet) may be relevant only until more permanent records are made and will be retained only temporarily.</p>
System audit and fraud prevention	<p>System audit logs are retained typically for a period of up to 6 months for system recovery and for up to 10 years for fraud prevention.</p>
Business analytics	<p>We keep most business analytics data for the duration of our marketing relationship with you as described in the first line of the table above. However, some elements of it naturally go out of date after a period of time, so we delete this automatically after defined periods as appropriate for the purpose for which we collected them.</p>
Age verification	<p>The details you submitted for us to verify your age are deleted once we have completed the process of verification. We may operate various processes for doing this and the retention period varies according to the process that is followed, from a few minutes to six months. We also keep some details separately, for fraud prevention purposes – see above.</p>

What rights and options do you have?

You may have some or all of the following rights in respect of information about you that we hold:

- request us to give you access to it;
- request us to rectify it, update it, or erase it;
- request us to restrict our using it, in certain circumstances;
- object to our using it, in certain circumstances;
- withdraw your consent to our using it;
- data portability, in certain circumstances;
- opt out from our using it for direct marketing; and
- lodge a complaint with the supervisory authority in your country (if there is one).

We offer you easy ways to exercise these rights, such as “unsubscribe” links, or giving you a contact address, in messages you receive.

MORE DETAILS

The rights you have depend on the laws of your country. If you are in the UK, European Economic Area and Switzerland, you will have the rights set out in the table below. If you are elsewhere, you can contact us (see the paragraph “who should you contact with questions?” at the end of this notice) to find out more or look at the specific section for your country below.

Right in respect of the information about you that we hold	Further detail (note: certain legal limits to all these rights apply)
to request us to give you access to it	<p>This is confirmation of:</p> <ul style="list-style-type: none"> • whether or not we process information about you; • your name and contact details; • the purpose of the processing; • the categories of information concerned; • the categories of persons with whom we share the information and, where any person is outside the UK, EEA and Switzerland and does not benefit from, the appropriate safeguards for protecting the information; • (if we have it) the source of the information, if we did not collect it from you; • (to the extent we do any, which will have been brought to your attention) the existence of automated decision-making, including profiling, that produces legal effects concerning you, or significantly affects you in a similar way, and information about the logic involved, as well as the significance and the envisaged consequences of such processing for you; and • the criteria for determining the period for which we will store the information.

	At your request we will provide you with a copy of the information about you that we use (provided this does not affect the rights and freedoms of others).
to request us to rectify or update it	This applies if the information we hold is inaccurate or incomplete.
to request us to erase it and in some cases an extension of this right, the right to be forgotten	<p>This applies if:</p> <ul style="list-style-type: none"> • the information we hold is no longer necessary in relation to the purposes for which we use it; • we use the information on the basis of your consent and you withdraw your consent (in this case, we will remember not to contact you again, unless you tell us you want us to delete all information about you in which case we will respect your wishes); • we use the information on the basis of legitimate interest and we find that, following your objection, we do not have an overriding interest in continuing to use it; • the information was unlawfully obtained or used; or • to comply with a legal obligation.
to request us to restrict our processing of it	<p>This right applies, temporarily while we look into your case, if you:</p> <ul style="list-style-type: none"> • contest the accuracy of the information we use; or • have objected to our using the information on the basis of legitimate interest <p>(if you make use of your right in these cases, we will tell you before we use the information again).</p> <p>This right applies also if:</p> <ul style="list-style-type: none"> • our use is unlawful and you oppose the erasure of the data; or • we no longer need the data, but you require it to establish a legal case.
to object to our processing it	<p>You have two rights here:</p> <p>(i) if we process information about you for direct marketing: you can “opt out” (without the need to justify it) and we will comply with your request; and</p> <p>(ii) if we process information about you on the basis of legitimate interest for purposes other than direct marketing, you can object to our using it for those purposes, giving an explanation of your particular situation, and we will consider your objection.</p>

to withdraw your consent to our using it	This applies if the legal basis on which we use the information about you is consent. These cases will be clear from the context.
to challenge certain automated decisions	<p>If we make a decision based solely on automated processing, and that decision produces legal effects concerning you or similarly significantly affects you, you have a right to contest the decision, to request us to have a human review of that decision, and to express your point of view.</p> <p>This right does not apply if:</p> <ul style="list-style-type: none"> (i) you gave your consent to the decision beforehand; (ii) that use of information about you is necessary for entering into; or the performance of, a contract between you and us; or (iii) it is authorized by law. <p>As mentioned above, these decisions will be drawn to your attention at the time, together with information about the logic involved in the decision, as well as the significance and the envisaged consequences for you of such use of information about you.</p>
to data portability	<p>If:</p> <ul style="list-style-type: none"> (i) you have provided data to us; and (ii) we use that data, by automated means, and on the basis either of your consent, or on the basis of discharging our contractual obligations to you, <p>then you have the right to receive the data back from us in a commonly used format, and the right to require us to transmit the data to someone else if it is technically feasible for us to do so.</p>
to lodge a complaint with the supervisory authority in your country	<p>If you have any complaint, we will welcome the opportunity to resolve it for you directly. Please consider contacting us via the contact details linked at the start of this notice before contacting a supervisory authority.</p> <p>If you do wish to contact a supervisory authority, details are as follows:</p> <ul style="list-style-type: none"> • for the European Union or European Economic Area, you can contact your local authority as listed on the Europa website via this link. • For the UK, you can contact the Information Commissioner's Office via this link. • For Switzerland, you can contact the Federal Data Protection and Information Commissioner via this link.

	<p>For other countries please consult the website of your country's authority.</p> <p>If you are unsure who your jurisdiction's supervisory authority is, please contact us using the details linked to at the top of this page.</p>
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Country-specific additional points

According to which country you are in, you may have some additional rights.

MORE DETAILS

If you are in Australia, find out more...

If you are in Australia, the following additional information applies to you:

- if you do not provide your personal information to us, we may not be able to (as applicable) provide you with the information, products or services that you request; and
- our Privacy Policy (available [here](#)) i) how you may access and correct the personal information that we hold about you; (ii) how you can lodge a complaint regarding our handling of your personal information; and (iii) how we will handle any complaint.

If you are in France, find out more...

If you are in France, you have the right to give us instructions regarding information we hold about you in the event of your death (specifically, whether we should store or delete it, and whether others should have the right to see it). You may:

- issue general instructions to a digital service provider registered with the French data protection supervisory authority (called "CNIL") (these instructions apply to all use of information about you); or
- give us specific instructions that apply only to our use of information about you.

Your instructions may require us to transfer information about you to a third party (but where the information contains information about others, our obligation to respect also their privacy rights might mean that we cannot follow your instructions to the letter). You may appoint a third party to be responsible for ensuring your instructions are followed. If you do not appoint a third party in that way, your successors will (unless you specify otherwise in your instructions) be entitled to exercise your rights over information about you after your death:

- in order to administer your estate (in which case your successors will be able to access information about you to identify and obtain information that could be useful to administer your estate, including any digital goods or data that could be considered a family memory that is transferable to your successors); and
- to ensure that parties using information about you take into account your death (such as closing your account, and restricting the use of, or updating, information about you).

You may amend or revoke your instructions at any time. For further information on the processing of information about you in the event of your death, see Article 40-1 of the law 78-17 dated 6 January 1978. When you die, by default, you will stop using your account and we will delete information about you in accordance with our retention policies (see the paragraph “How long will information about you be kept?” for details).

If you are in the Philippines, find out more...

If you are in the Philippines, you may have rights in addition to those set out in this notice in accordance with the Philippine Data Privacy Act and its implementing rules and regulations, including the National Privacy Commission’s Privacy Policy Office Advisory Opinion No. 2018-031.

If you are in Switzerland, find out more...

If you are in Switzerland, information about you may be transferred outside of Switzerland, including to a country or territory that may not have equivalent data protection standards. In such cases, the transfer will be subject to appropriate safeguards such as the Standard Contractual Clauses in accordance with the new Data Protection Act and guidance from the Federal Data Protection and Information Commissioner.

If you are in Taiwan, find out more...

If you are in Taiwan, the following additional information applies to you:

If you do not provide your personal information to us, we may not be able to (as applicable) provide you with the information, products or services that you request.

If you are in the United Kingdom, find out more...

If you are in the United Kingdom, you may have rights in addition to those set out in this notice under UK data protection law. These include the right to obtain further information about how your personal data is used, accessed, or shared, and the safeguards that apply. You also have the right to raise concerns or make a complaint about how we handle your personal data using the contact details set out in our privacy notice. If you are not satisfied with our response, you have the right to complain to the Information Commissioner’s Office (ICO).

Who should you contact with questions?

If you have any questions, or wish to exercise any of your rights, you can find contact details for the relevant affiliate, and if applicable data protection officer, linked to at the top of this notice. Contact details will also be given in any communications that our affiliate sends you.

If your country has a data protection authority, you have a right to contact it with any questions or concerns. If our relevant affiliate cannot resolve your questions or concerns, you may also have the right to seek judicial remedy before a national court.

Changes to this notice

We may update this notice (and any supplemental privacy notice), from time to time. Where the law requires it, we will notify you of the changes; further, where the law requires it, we will also obtain your consent to the changes.

Last modified: 16 June 2026