

Privacy Policy

1 INTRODUCTION

1.1 This privacy policy (the “**Policy**”) sets out how V.Group uses the information provided when you use this site. *If you are accessing this website from the Philippines, please see the Privacy Policy (Philippines) at <https://vgrouplimited.com/legal/data-protection-overview-philippines/>*

1.2 This Policy:

- (a) forms part of V.Group’s Data Protection Policy (<https://vgrouplimited.com/data-protection-overview/>);
- (b) applies to all users of this site; and
- (c) may be amended by V.Group at any time, consistent with the requirements of applicable laws and regulations. Any revisions will take effect from the date on which the amended Policy is published, as indicated by the version number.

2 DEFINITIONS

2.1 “**Personal Data**” is as defined in the Data Protection Policy;

“**Sensitive Personal Data**” is as defined in the Data Protection Policy; and

“**V.Group**” means Vouvray Acquisition Ltd and its subsidiaries and/or affiliates.

2.2 Words denoting the singular shall include the plural and vice versa.

2.3 Unless otherwise stated, all defined terms have the same meaning as defined in the Data Protection Policy.

3 INFORMATION COLLECTED

3.1 When using this site, we may ask you for Personal Data, for example, your name, address or telephone number, email address to provide you with the services you wish to make use of. We also collect Personal Data when you voluntarily complete customer surveys, provide feedback and participate in competitions. Unless otherwise agreed with you, we will not collect any Sensitive Personal Data.

3.2 Where Personal Data is not obtained directly from you but from a third party, the categories of such Personal Data may include individuals’ contact details, educational background, financial and pay details, details of certificates and diplomas, education and skills, marital status, nationality, job title and CV. Sources for such Personal Data may include the third party’s databases and public sources.

3.3 Cookies (see below) may also collect information about your use of this site or other sites accessible from our website.

4 BASIS FOR PROCESSING

4.1 The basis of our processing of Personal Data is set out in the Data Protection Policy.

5 USE OF YOUR PERSONAL DATA

5.1 We use your Personal Data for purposes, including without limitation, the following:

- (a) to facilitate your use of the site and our services, e.g. personalising repeat visits;
- (b) to help us analyse people's use of our site to improve the user experience;
- (c) if you agree, to email you about other products and services we think may be of interest to you;
- (d) if you explicitly consent, we shall pass on your Personal Data within V. Group so they may offer you their products and services or to third parties; and
- (e) in providing our services, we may send your details to, and also use information from, credit reference agencies and fraud prevention agencies.

5.2 We will only collect and use Personal Data in accordance with applicable data protection laws.

6 DATA RETENTION

6.1 We have in place the Data Retention & Destruction Policy to be followed in respect of the data retention.

7 YOUR RIGHTS

7.1 For more information on your rights, please see the Data Protection Policy.

8 DATA TRANSFERS

8.1 We may transfer data outside of the EEA. For further information on the adequate safeguards adopted by us for the international transfer of Personal Data, please see the Data Transfers Policy.

9 COOKIES

9.1 Cookies are small text files placed on your computer by websites you visit to help personalise the site for your use and to improve site functionality. Most browsers allow you to turn off cookies. Switching off cookies may restrict your use of a website. By using our website, you agree that we can place the types of cookies referred to above on your device.

9.2 We use the following cookies on our website:

- (a) 'Session cookies'

Created only for the time of your visit and are deleted when you leave the website.

(b) ‘Persistent cookies’

Remain on your device for a period of time specified in the cookie and are activated each time you visit the website so it remembers who you are when you return.

(c) ‘Strictly necessary cookies’

Essential to enable you to navigate the website and use its features.

(d) ‘Performance cookies’

Collect information about how visitors use our website to help us improve it. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. This information cannot be used to identify who you are.

10 OTHER WEBSITES

10.1 Our website may contain links to other websites which are outside our control and are not covered by this Policy. If you access other sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

11 CONTACT

11.1 If you have any comments or queries regarding this site, please contact media@vgrouplimited.com.

12 DOCUMENT CONTROL

12.1 The Global DPO is the owner of this Policy and is responsible for ensuring that this procedure is reviewed in line with the relevant review requirements.

12.2 A current version of this Policy is available at <https://vgrouplimited.com/data-protection-overview/>

12.3 This Policy was approved as stated in this Paragraph and is issued on a version-controlled basis.

Version	Date of Issue	Approved by	Position
1	05.04.2018	Rod Day	Chief Financial Officer
2	28.06.2019	Deborah Grimason	General Counsel & Company Secretary