



Privacy Notice for Website

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1 Introduction

1.1 This privacy notice and any amended version of it (the “**Notice**”) sets out how V. 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 Notice:

- (a) forms part of V.’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. at any time, consistent with the requirements of applicable laws and regulations. Any revisions will take effect from the date on which the amended Notice is published, as indicated by the version number.

2 Definitions

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



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

Unless otherwise stated, all defined terms have the same meaning as defined in the Privacy Notice.

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 and/or enquiry details to provide you with the services you wish to make use of (i.e., by using the "contact us" function). We may 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. If required by applicable Data Protection Laws, we may ask for separate consent to process your data or when we transfer your Personal Data outside your country, to another Personal Data handler or if we make the Personal Data public.

3.2 Cookies (see section 9 below) may also collect information about your use of this site or other sites accessible from our website.

4 Basis for Processing

4.1 We process your Personal Data to provide goods and services to you, for the purposes of our legitimate interests in improving our services (such as responding to queries, analysing prospective clients and business administration) and to comply with legal obligations.

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 explicitly consent, to contact 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. so we may offer you our 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.



For other purposes which are not listed above, we will inform you and get your consent or explain the legal basis for such use according to applicable Data Protection Laws.

5.2 We will only collect and use Personal Data in accordance with applicable Data Protection Laws.

6 Data Retention

6.1 We retain your personal data for as long as necessary to provide our services to you, unless there is a separate legal or regulatory reason for us to retain it for longer. Please refer to our Data Retention and Destruction Policy on our website for more information on this.

7 Your Rights

7.1 V. will respond to requests made by Data Subjects to exercise their legal rights in relation to Personal Data that V. holds about them. Please note that there may be limitations on these rights, depending on the specific circumstances concerning your data and the applicable law.

7.2 Subject to applicable exemptions, Data Subjects covered by **UK or EU Data Protection Laws** have the following rights:

- (a) To be informed** about any Personal Data held about them by V. Please review this policy in full together with our Privacy Policy, Cookies Statement, Data Transfers Policy, the Data Retention & Destruction Policy and the Personal Data Incident Notification Policy (together the global data protection policies) for full information;
- (b) Request access** to their Personal Data and be provided with information in relation to that data to ensure it is being lawfully processed. Please refer to <https://vgrouplimited.com/data-protection-overview/>, "Subject Access Request Form" for further instructions on making such a request and send this form to the following contact: data.request@v.group. On request V. will also provide further information on how a Data Subject can exercise the rights set out here, please see paragraph 11 (complaints and contacts) for details;
- (c) Rectification** of any incomplete or inaccurate data held about them by V. (although V. may need to verify the accuracy of any new data provided);
- (d) Erasure** of Personal Data where there is no compelling reason for V. continuing to process it; where a Data Subject has successfully exercised its rights to object to processing (below), where V. has processed Personal Data unlawfully or where V. is required to erase its Personal Data to comply with the local law in which that Data Subject is based. Please note that V. can



refuse to delete or remove Personal Data where it requires information for defence of legal claims;

- (e) **To restrict processing** of Personal Data; a Data Subject may exercise this right where (i) it is requesting rectification, in which case processing is suspended until the information is verified, (ii) V. is processing its Personal Data unlawfully and as an alternative to exercising its right to request erasure, (iii) V. no longer needs to process its Personal Data but the Data Subject needs the Personal Data for the establishment, exercise or defence of legal claims; or (iv) a Data Subject has exercised its right to object to processing of Personal Data which relies on legitimate interests as a basis for lawful processing, and V. need to verify that it has such legitimate interests;
- (f) **Object to processing** of Personal Data on the basis that it impacts on that Data Subject's rights and freedoms, however in some cases V. may demonstrate that it has compelling legitimate grounds to process Personal Data which overrides the rights and freedoms of a Data Subject or where it requires that information for defence of legal claims;
- (g) **To receive a copy** of Personal Data in a machine-readable format or request the transfer of Personal Data to another party;
- (h) **To not be subject to automated decision-making, including profiling**, which has a legal or other significant effect on that Data Subject. We do not envisage taking any decision about you using automated means, nor that you will be subject to decisions based solely on automated decision-making; and
- (i) **Make a complaint at any time** to the relevant Supervisory Authority in that Data Subject's jurisdiction, depending on its location. V. would welcome the chance to deal with a Data Subject's concerns before it approaches the Supervisory Authority; please paragraph 11 (complaints and contact) for details

7.3 The Philippines

Data Subjects covered by the DPA have the following rights:

- (a) to lodge a complaint with the Philippine National Privacy Commission for violations of applicable Philippines data privacy laws; and
- (b) to be indemnified for any damages sustained due to use of inaccurate, incomplete, outdated, false, or unlawfully obtained Personal Data, or due to unauthorised use of Personal Data.

7.4 People's Republic of China's

Data Subjects covered by the PIPL, also have the following rights:



- (a) **To be informed** of the data handling activities, including (i) the identity and contact details of the data handler, (ii) the purposes and methods of the handling, (iii) the type of Personal Data that is being handled, (iv) the storage period and (v) the methods and procedures for Data Subjects to exercise their rights;
- (b) **To determine, restrict and refuse** data handling activities in whole or part;
- (c) **To access** Personal Data and request a copy, except where the PIPL provides that the handling of the Personal Data may be confidential or exempted;
- (d) **To rectify and supplement** the Personal Data, provided this information can be verified by the data handlers;
- (e) **To delete** the Personal Data where the data handler has failed to delete the information after (i) the data handling is no longer necessary for achieving the purposes; (ii) the data handler has ceased to provide a product or service to the Data Subject or the agreed storage period has expired; (iii) the Data Subject has withdrawn their consent; (iv) the data handler has violated applicable Data Protection Legislation to the data handling or has breached any agreement related to the data handling; or (v) any other situation provided for in applicable Data Protection Legislation;
- (f) **To request transfer** of the Personal Data to other data handlers, provided this satisfies the conditions raised by the Cyberspace Administration of China;
- (g) **To request explanation** where Personal Data is used for automated decision-making and such decision may cause a material impact on the personal rights and interests of a Data Subject;
- (h) **To exercise rights** of access, copy, rectification and deletion on behalf of a deceased person by his/her close relatives for lawful and legitimate interests of their own, unless otherwise arranged by the deceased person prior to his/her death;
- (i) **Right to request explanation** V.'s handling rules for personal information; and
- (j) **Right to inherit data subject rights**; where a data subject dies, his/her close relatives may, for the purpose of their own lawful and legitimate interests, exercise such rights as prescribed, unless otherwise arranged by the deceased prior to his/her death.

7.5 For other jurisdictions, V. will respond to such Data Subject requests and apply the appropriate requirements under the Data Protection laws applicable to that Data Subject or request.



8 Data Transfers

- 8.1 We may transfer data outside of the United Kingdom, European Economic Area or another jurisdiction where we collect your data as part of our global operations. For further information on the adequate safeguards adopted by us for the international transfer of Personal Data, please see the Data Transfers Policy on our website.

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 part of your use of the website but will not lead to prohibition of your use. By using our website, you agree that we can place the types of cookies referred to above on your device.
- 9.2 Please see our [Cookies Statement](#) on our website for further information about the cookies we use on our website.

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 Complaints and Contact

- 11.1 If you have any concerns, comments or queries regarding our use of your data, or about your rights as a Data Subject, please contact dpo@v.group
- 11.2 If you would like to make a complaint, please contact data.protection@v.group
- 11.3 In relation to UK data protection issues, please contact the Information Commissioner's Office (ICO), the UK Supervisor Authority for data protection issues:

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113



ICO website: <https://www.ico.org.uk>

11.4 Data Subjects may also contact a Data Supervisory Authority of their choice; for a list of European Data Supervisory Authorities, please see: https://edpb.europa.eu/about-edpb/about-edpb/members_en.

11.5 In relation to Greek data protection issues, please contact the Hellenic Data Protection Authority:

Kifisias Av. 1-3
11523 Ampelokipi Athens
Tel. +30 210 6475 600
Fax +30 210 6475 628
Email: contact@dpa.gr
Website: <http://www.dpa.gr/>.

12 Document Control

12.1 The General Counsel & Company Secretary is the owner of this Notice and is responsible for ensuring, alongside the Global DPO, that this document is reviewed in line with the relevant review requirements.

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

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

Version	Details of Version(s)	Revision Approved by	Date
1	Initial Notice	Rod Day, Chief Financial Officer	05.04.2018
2	Update Notice	Deborah Grimason, General Counsel & Company Secretary	28.06.2019
3	Update Notice	Deborah Grimason, General Counsel & Company Secretary	06.12.2021
5	Update Notice	Niree Mahabeer, General Counsel & Company Secretary	11.08.2023