

GUINNESS NIGERIA PLC PRIVACY AND COOKIE NOTICE OVERVIEW

1. Introduction

- Our consumers are at the heart of what we do. This Privacy and Cookie Notice applies to personal information collected by or on behalf of Guinness Nigeria Plc being a company within the Diageo group of companies. **Diageo plc** is the world's leading premium drinks business.
- This **section** provides a high-level overview of our detailed **Privacy and Cookie Notice below**. It summarises important information contained in our detailed **Privacy and Cookie Notice** regarding how we collect, use, and share your personal information. References to the relevant sections of the detailed **Privacy and Cookie Notice** are set out below for your convenience.
- See **Section 1** for more information about **Diageo plc**.

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.
- See **Section 2** for more details regarding legal purchase age.

3. What types of personal information do we collect?

- Personal information is information about an identifiable individual, as defined by applicable law. The personal information we collect includes (a) information you provide to us, (b) information we automatically collect/generate, and (c) information we obtain from third parties.
- The personal information you provide includes contact details, demographic information, registration information, payment information, information in surveys and questionnaires, competitions entries, information posted online, and marketing preferences.
- The personal information we automatically collect/generate or obtain from third parties includes (a) information relating to your device (such as your PC, tablet or other mobile device), (b) information regarding your use of our website, mobile apps, and certain third party websites with whom we have partnered, and (c) information about your personal preferences, interests, or geographic location.
- See **Section 3** for more details and examples of the types of personal information we collect.

4. What Constitutes your Consent?

In line with the Nigeria Data Protection Regulation, consent would be deemed to have been given in any of the following circumstances:

- where you provide information for the purpose for entering into a competition.
- by accessing our websites through the DrinkIQ age gate.
- where you click to consent are made aware of a particular information and you proceed.
- Note that you can withdraw your consent at any time, however such withdrawal of consent would not affect the lawfulness of processing information based on consent given before its withdrawal. To withdraw your consent please click on the "unsubscribe" link at the bottom of any marketing email we send you.

Note also that your consent would not be required where the information is necessary for compliance with a legal obligation to which Guinness Nigeria Plc is subject.

5. How/when do we collect personal information?

- There are various situations in which you may voluntarily provide personal information to us. These include when you enter a competition, fill in a questionnaire, purchase products from us, contact us with an enquiry, register on or post a comment on our website or app, attend our events, and/or inform us of your marketing preferences.
- When you browse or use our website or apps, as well as certain third party websites with whom we have partnered, we (and our partners) use cookies and similar technologies to collect information automatically from your device (such as your PC, tablet or other mobile device). We also use certain automated techniques and technologies to infer or generate additional information about you, for example by analysing or predicting certain personal aspects such as your personal preferences or interests. We also receive IP addresses from users as this information is automatically reported by browsers each time you view a web page.
- From time to time we partner with and use the services of various third parties to 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, third-party social media platforms, and other third party sites with whom we have partnered.
- See **Section 4** for more details regarding how and when we collect personal information.

5. Purposes for which your personal information is used

- We use your personal information for the following purposes: to send you marketing communications and to display the most appropriate and relevant advertising to you either on our websites, apps, or third party websites (including social media platforms), to verify your identity and manage your access to our website, apps and content, to comply with legal obligations and protect against legal claims or liability, to conduct marketing analysis and online ad verification, to provide specific services to you and manage transactions, to facilitate any corporate transactions that we may be involved with, and to engage in technical maintenance.
- See **Section 5** for more details regarding the purposes for which your personal information is used.

6. Cookies and similar technologies

- We use cookies, scripts, pixel tags, etags, web beacons and similar technologies (collectively referred to as “cookies”) to help us gather and store information about visitors to our websites, apps and certain third party websites with whom we have partnered. There are a number of ways to manage cookies as described in **Section 6**. You also have the ability to accept or decline cookies by modifying the settings in your browser. However please also note that you may not be able to use all the interactive features of our site if all cookies are disabled.
- We use two broad types of cookies: (a) First party cookies (served directly by us to your device when you visit our website), and (b) Third party cookies (served by a third party on our behalf when you visit our website and certain third party websites with whom we have partnered).
- The cookies we use can be divided into four broad categories: (1) Strictly Necessary Cookies, (2) Performance Cookies, (3) Functionality Cookies, and (4) Targeting Cookies or Advertising Cookies.
- See **Sections 6-8** for more details about the types of cookies we use, what they are used for and how you can opt-out of cookies.

7. Legal basis for the processing of personal information

- We will only process your personal information where we have a legal basis to do so. The legal basis will depend on the purposes for which we have collected and use your personal information. In almost every case the legal basis will be either (a) where we have your consent, (b) our legitimate business interests, (c) performance of a contract with you, or (d) compliance with law.
- See Section 10 for more details regarding the legal basis on which we process your personal information.

8. 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 where you have provided your consent, (b) our service providers and subcontractors, (c) third parties who we believe are

providing or seeking the information as your legal agent, (d) third parties in the event of a corporate transaction, and (e) law enforcement, governmental or regulatory agencies.

- See Section 11 for more details regarding the disclosure of your personal information to third parties.

9. Will we transfer your personal information abroad?

- Your personal information may be transferred to, and stored at, a destination outside the country in which you reside, including countries, which have less strict, or no data protection laws, when compared to those in your country.
- Whenever we transfer your information in this way, we will take steps which are reasonably necessary to ensure that adequate safeguards are in place to protect your personal information and to make sure it is treated securely.
- See Section 12 for more details regarding the international transfer of your personal information.

10. Public areas of our websites and apps

- Information that you post on or through the public areas of our websites and apps or on social media platforms generally 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.

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 14 for more information.

12. Your rights

- You have certain rights in relation to your personal information. These rights include the right to withdraw your consent to any processing of your personal information (where you had provided consent), object to the processing of your information for certain purposes, the right to access your personal information, and the ability to erase, restrict or in certain cases receive a machine-readable copy of your personal information. You may also unsubscribe from any of our marketing communications at any time.
- If you wish to exercise any of these rights you may contact us (using the contact details provided below).
- You may also have the right to complain to a data protection authority (where applicable) if you think we have processed your personal information in a manner which is unlawful or breaches your rights. However, if you do have such concerns we request that you initially contact us.
- See section 15 for more information regarding your rights.

13. How long will we retain your personal information for?

- We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy and Cookie Notice unless a longer retention period is required or permitted by law.
- See Section 16 for more details regarding the periods for which we retain your personal information.

14. Contact Us

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

- **Post:** 24 Oba Akran Avenue, Ikeja, Lagos, Nigeria.
- **Email:** consumer.privacy.queries@diageo.com

DIAGEO DETAILED PRIVACY AND COOKIE NOTICE

1. Introduction

This website and/or mobile app is operated by Guinness Nigeria Plc a member of the Diageo group of companies, the ultimate holding company of which is Diageo plc (registered in England and Wales with company number 23307 and registered address at Lakeside Drive, London, NW10 7HQ, United Kingdom).

All references to 'our', 'us', 'we', or 'company' within this notice are deemed to refer to Diageo plc, 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 of your personal information that we hold in accordance with the Nigeria Data Protection Regulation ("The Regulation"). We will use your information only for the purposes set forth below and permitted by the Regulation.

We may need to update this Privacy and Cookie Notice from time to time. Depending on the nature of the change, we may contact you with details of the change. We also recommend that you check this page regularly to ensure that you have read the most recent version.

Changes to the Privacy and Cookie Notice are noted here:

Date last revised: April, 2019

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 website or app. 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 efforts 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 types of personal information do we collect?

Personal information is information about an identifiable individual, as defined by applicable law. The personal information we collect includes (a) information you provide to us, (b) information we automatically collect/generate, and (c) information we obtain from third parties. We have set out below more details regarding these types of personal information:

- **Information you provide to us:** These types of personal information include:
 - contact details (such as your name, postal addresses, phone numbers and email addresses),
 - demographic information (such as your age or age range and gender),
 - online registration information (such as your password and other authentication information),
 - payment information (such as your credit card information and billing address),
 - information provided as part of online questionnaires (such as responses to any customer satisfaction surveys or market research),
 - competition entries/submissions, and
 - in certain cases your marketing preferences.

- **Information we automatically collect/generate or obtain from third parties:** These types of personal information may relate to your device (such as your PC, tablet or other mobile device), your use of our websites and apps (as well as certain third party websites with whom we have partnered), and/or your personal preferences, interests, or geographic location. Examples of these types of information include:
 - name and age (or predicted age range),
 - information about your device, operating system, browser and IP address,
 - unique identifiers associated with your device,
 - details of web pages that you have visited,
 - which products you have looked at online (including information about products you have searched for or viewed, purchased or added to an online shopping basket),
 - how long you spend on certain areas of a website or app together with the date and time of your visit/usage,
 - personal information contained within user-generated content (such as blogs and social media postings),
 - social media user name or ID, and
 - social media profile photo and other social media profile information (such as number of followers).

4. How/when do we collect personal information?

- **Information you provide to us:** There are various situations in which you may voluntarily provide personal information to us. These include when you:
 - enter a competition or take advantage of a promotion,
 - fill in an online questionnaire (such as a customer satisfaction survey),
 - provide credit card details (such as when purchasing products from us),
 - contact us with an enquiry or ask us to provide you with information,
 - register on a website or app or leave any reviews or comments,
 - attend any of our promotional events,
 - forward an item to a friend,
 - inform us of your marketing preferences, and/or
 - communicate with us via social media websites, third party apps or similar technologies.

We will indicate where any personal information we have requested is mandatory or optional. We will also explain the consequences should you decide not to provide information which we have indicated is mandatory. In some circumstances this may mean we are unable to provide you with a certain service or product.

- **Information we automatically collect/generate:** When you browse or use our websites or apps (as well as certain third party websites with whom we have partnered) we (and our partners) use cookies and similar technologies to collect information automatically from one or more of your devices associated with you (see below for more details regarding the use of cookies and similar technologies). We also use certain automated techniques and technologies to infer or generate additional information about you, for example by analysing or predicting certain personal aspects such as your personal preferences or interests.
- **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, the IP address will be different every time you log on. Many IP addresses are commonly associated with Internet service providers (ISPs), universities, or major corporations in specific regions or localities. We receive IP addresses from all users because this information is automatically reported by your browser each time you view a web page. IP addresses are generally recorded in files called "log files".
- **Information we obtain from third parties:** From time to time we partner with and use the services of various third parties to collect personal information about you from other legitimate third party data sources. The types of sources include information from commercially and/or publicly available sources such as data aggregators, public databases, third-party social media platforms and other third party websites with whom we have partnered.

5. Purposes for which your personal information is used

The different purposes for which we use your personal information are set out below:

- **Marketing Communications:** We may use your personal information to communicate with you through channels such as email and SMS 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 as described in Section 12 (Your Rights).
- **Online targeted advertising:** We use techniques such as “online behavioural advertising” and “programmatic advertising” which involve the use of personal information (and the sharing of it with our service providers) to display the most appropriate and relevant advertising to you either on our websites, apps or third party websites (including social media platforms). We may also use your personal information (and share it with our service providers as described below) in order to determine if you are a member of a particular social media platform so that we can display our advertising to on that service or to identify consumers who share similar interests and characteristics with you for the purposes of online targeted advertising. See the section on **Cookies** below for more details about online targeted advertising. You have the right to opt-out at any time from the use of your personal information for online targeted advertising – see the section on **Cookies** below as well as Section 12 (Your Rights).
- **Authentication and access control:** We may use your personal information to authenticate your access to our websites or apps and to determine which content to provide you and/or whether you should be granted access to certain content (for example depending on your age or location). We may also use your personal information to verify your identity when responding to any requests to exercise your rights under applicable law.
- **Comply with legal obligations and protect against legal claims or liability:** We may use your personal information to comply with our legal obligations, protect us against legal claims, 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.
- **Marketing analysis:** We may use your personal information for marketing analysis, for example, to assess trends amongst our consumers and what people are saying about our products, to evaluate the impact and effectiveness of our marketing campaigns and promotions, and to analyse the number and types of visitors to our websites and/or users of our apps (including the locations from which such visitors/users access our websites and apps). We often aggregate personal information for these purposes so that it no longer identifies any particular individual.
- **Online ad verification:** We use personal information to monitor our digital advertising to ensure that it does not appear on unsuitable websites or near inappropriate content, and also to ensure that our advertising is visible and seen by real people online (as opposed to ‘bots’ or similar fraudulent techniques).
- **Transactional purposes:** We will use your personal information to provide specific services that you request from us, as well as to provide additional services that may be of interest. We will also use your personal information to maintain your accounts, and manage transactions such as credit card payments for any products that you order from us or our agents, or for the fulfilment of such transactions (e.g. delivery).
- **Corporate transactions:** We may use your personal information 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 a third party information concerning your relationship with us.
- **Customer services:** We will also use your personal information to respond to your queries and requests, for example when you contact our customer services team. We may also use your personal information to notify you about changes to our services, our terms and conditions or this Privacy and Cookie Notice.
- **Technical maintenance:** We use personal information for system administration purposes and to diagnose service or technology problems reported by our users or engineers, these types of problem may be associated with the IP addresses controlled by a specific web company or ISP.
- **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 and that he/she is happy to receive any such communications.

6. Cookies and similar technologies

Like many other websites and apps, we use cookies, scripts, pixel tags, etags, web beacons and similar technologies (collectively referred to as “cookies”) to help us gather and store information about visitors to our websites and apps and certain third party websites with whom we have partnered. This section and the sections below provide information about how we use cookies and how you can control them.

A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your device's hard disk. 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. You can find more information about cookies at: www.allaboutcookies.org. More details regarding the specific cookies we use and the purposes for which we use them are set out in the sections below.

There are a number of ways to manage cookies as described below. You also have the ability to accept or decline cookies by modifying the settings in your browser. Please refer to your browser instructions or help screen to learn more about the functions which your browser provides to manage cookies. If you use different browsers you may need to ensure that each browser is adjusted to suit your cookie preferences. However please also note that you may not be able to use all the interactive features of our site if all cookies are disabled.

7. What types of cookies do we use?

We use two broad types of cookies:

- **First party cookies**, served directly by us to your device when you visit our website.
- **Third party cookies**, served by a third party on our behalf when you visit our website and certain third party websites with whom we have partnered.

8. What do we use cookies for?

The cookies we use can be divided into four broad categories: (1) Strictly Necessary Cookies, (2) Performance Cookies, (3) Functionality Cookies, and (4) Targeting Cookies or Advertising Cookies. See below for more details regarding each of these categories of cookies.

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.

- 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 media sites such as Facebook and Twitter and allows interaction between your activity on social media 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 directly identifies a visitor. All information collected by these cookies is aggregated and therefore becomes anonymous. It is only used to improve how a website works.

- 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. These analytical tools use cookies to collect standard internet log information and visitor behaviour information which is then aggregated so that it does not identify any individuals. 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 based on demographics and interests. We also use a tool called 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://diageogreatbritainltd.d3.sc.omtrdc.net/optout.html?popup=1>.

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.

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

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 remember user choices regarding the site, and 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 third party advertising technology providers (such as advertising networks and other digital advertising platforms) 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.

- What type of Targeting Cookies or Advertising Cookies do we use?

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, including third party social media platforms) 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.

We may also use certain service providers to set cookies on our behalf via third party websites with whom we have partnered. These cookies enable us to analyse consumers' visits to specific sections of those websites and collect certain information regarding purchases of our products from those websites. The types of information collected by such cookies may include: shopping cart information, what product pages have been viewed, whether a purchase of a Diageo product has been made, which Diageo products have been searched for.

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



If you see any of our advertising with this logo on it - you're able to take control of whether you get these types of ads. This is the AdChoices icon and provided by the European Interactive Digital Advertising Alliance (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 in this way visit - <http://www.youradchoices.com/>

10. Legal basis for the processing of personal information

We will only process your personal information where we have a legal basis to do so. The legal basis will depend on the purposes for which we have collected and use your personal information. In almost every case the legal basis will be one of the following:

- **Consent:** For example, where you have provided your consent to receive certain marketing from us. You can withdraw your consent at any time, including by clicking on the "unsubscribe" link at the bottom of any marketing email we send you.
- **Our legitimate business interests:** Where it is necessary for us to understand our customers, promote our services and operate effectively as a multinational beverages company, provided in each case that this is done in a legitimate way which does not unduly affect your privacy and other rights. For example we will rely on this legal basis when we conduct certain market analysis to understand our customers in sufficient detail so we can create new products and improve the profile of our brands.
- **Performance of a contract with you:** This would also apply where we need take steps prior to entering into a contract with you. For example, where you have purchased a product from us and we need to use your contact details and payment information in order to process your order and send the product to you.
- **Compliance with law:** Where we are subject to a legal obligation and need to use your personal information in order to comply with that obligation.

11. 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:

- third parties where you have provided your consent. For example we will obtain your permission before we allow a third party that is not an affiliate to send you any marketing and promotional information relating to that third party's products or services;
- our service providers and subcontractors, including our affiliates, and/or third party websites (such as social media platforms or search engines) retained to perform functions on our behalf, or to provide services to us (such as warehousing and delivery; marketing and advertising (including by delivering targeted advertising on third party websites and social media platforms); credit card and data processing; age verification; monitoring our digital advertisements to ensure that they do not appear on unsuitable websites or near inappropriate content and also to ensure that our advertising is visible and seen by real people online (as opposed to 'bots' or similar fraudulent techniques); 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;
- third parties who, in our reasonable judgment, are providing or seeking the information as your authorized or appointed legal agent;

- 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, personal information that you provide and other information concerning your relationship with us; and
- 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.

12. Will we transfer your personal information abroad?

Please note that your personal information may be transferred to, and stored at, a destination outside the country in which you reside, including countries, which have less strict, or no data protection laws, when compared to those in your country.

Whenever we transfer your information as described in the paragraph above, we will take steps which are reasonably necessary to ensure that adequate safeguards are in place to protect your personal information and to make sure it is treated securely. In these cases, we rely on data transfer mechanisms approved by the Agency under the supervision of the Honourable Attorney General of the Federation as provided for by the Nigeria Data Protection Regulation to ensure your information is subject to adequate safeguards in the recipient country. If you are located in Nigeria, you may contact us for a copy of the safeguards which we have put in place to protect your personal information and privacy rights in these circumstances.

13. Public areas of our websites and apps

Information that you post on or through the public areas of our websites and apps (e.g., chat rooms, bulletin boards, discussion groups), or on social media platforms 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 our websites or apps on social media platforms.

14. 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 and/or app, 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.

15. Your rights

You have certain rights in relation to your personal information. These rights include the right to withdraw your consent to any processing of your personal information (where you had provided consent), object to the processing of your information for certain purposes, the right to access your personal information, and the ability to erase, restrict or

in certain cases receive a machine-readable copy of your personal information. You may also unsubscribe from any of our marketing communications at any time.

If you wish to exercise any of these rights you may contact us (using the contact details provided below). We will handle any request to exercise your rights in accordance with applicable law and any relevant legal exemptions.

You may also have the right to complain to a data protection authority if you think we have processed your personal information in a manner which is unlawful or breaches your rights. If you have such concerns we request that you initially contact us (using the contact details below) so that we can investigate, and hopefully resolve, your concerns.

16. How long will we retain your personal information for?

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy and Cookie Notice unless a longer retention period is required or permitted by law. After this period it will be deleted or in some cases anonymised.

For example, where you have made a purchase with us, we will keep a record of your purchase for the period necessary for invoicing, tax and warranty purposes. We may also keep a record of correspondence with you (for example if you have made a complaint) for as long as is necessary to protect us from a legal claim.

Where we have collected the personal information based on your consent and we have no other lawful basis to continue with that processing, if you subsequently withdraw your consent then we will delete your personal information. However, please note that where you unsubscribe from our marketing communications, we will keep a record of your email address to ensure we do not send you marketing emails in future.

17. Communications regarding Diageo brands

If you have given permission to receive communications about Diageo brands generally (for example, by opting to receive news and special offers by email about Diageo'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 Diageo's brands can be found at www.diageobrand.com.

We occasionally may send you communications about brands not featured on www.diageobrand.com (e.g., new brands). We recommend that you refer to www.diageobrand.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 Diageo'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 Diageo brands.

18. Interfaces with Third-Party Websites and Services

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

This Privacy and Cookie Notice may be supplemented by additional legal requirements in jurisdictions where we conduct business as required. Nothing in this Privacy and Cookie Notice or otherwise will create, or add to, any right or claim (whether legal, equitable, or otherwise) that any individual or person may have at law or otherwise against the company or any third party, or any of their respective directors, officers, employees, agents, or representatives (collectively the "Diageo Group"), nor will the existence of this Privacy and Cookie Notice or its application impose or add to any obligations upon or create any liability for the Diageo Group that it does not already otherwise have under law.

19. Contact Us

If you have any privacy-related questions, concerns or complaints, please contact: Data Privacy Officer, Compliance Legal Team, Guinness Nigeria plc, 24 Oba Akran Avenue, Ikeja, Lagos, Nigeria or consumer.privacy.queries@diageo.com

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