

## PRIVACY AND COOKIE NOTICE

### 1. Introduction

This website is operated by 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 policy and within the opt-in 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 personal information that we obtain from you. By providing your personal information to us, you signify your acceptance of our Privacy and Cookie Notice and agree that we may collect, use, and disclose your personal information as described in this Privacy and Cookie Notice. If you do not agree to this Notice, please do not provide your personal details to us.

This Privacy and Cookie Notice is incorporated into, and part of, the [Terms and Conditions](http://www.mydiageopension.com/Pages/TermsandConditions.aspx) <http://www.mydiageopension.com/Pages/TermsandConditions.aspx>, that govern your use of the site in general. We will use your information only for the purposes set forth below.

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

Changes to the Privacy and Cookie Notice are noted here:

Date last revised: *18 April 2013*

Description of substantive revisions:

*18 April 2013* : Initial submission of notice

## **1. What is personal information?**

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

## **2. Collecting personal information**

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

You may choose to provide us with personal information if, for example, you: contact us with an enquiry; register on the site; forward an item to a friend; fill out a survey or other form with your personal information included; ask us to provide you with information; enter a competition; post information to public areas of the site; or take advantage of a promotion.

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

## **3. Cookies**

Like many other websites, we use "cookies" to help us gather and store information about visitors to our websites.

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. 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](http://www.allaboutcookies.org). Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve your experience. They can also help to ensure that adverts you see online are more relevant to you and your interests.

### **What types of cookies are used on this site?**

The cookies which may be used on this site have been categorised based on the categories set out in the International Chamber of Commerce UK Cookie guide as follows:

## **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 Cookie. This is a cookie that identifies you with social networking sites such as Facebook and Twitter and allows interaction between your activity on social networking sites and on our website through your direction, and makes your transition between the sites more seamless.

## **Category 2: Performance Cookies**

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

### **What type of Performance Cookies do we use on on our website?**

We use Google Analytics to help analyse use of our website. This analytical tool uses 'cookies', which are text files placed on your computer, to collect standard internet log information and visitor behaviour information in an anonymous form. The information generated by the cookie about your use of the website (including your IP address) is transmitted to Google. This information is then used to evaluate visitors' use of the website and to compile statistical reports on website activity. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

## **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?**

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

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

### **Category 4: Targeting Cookies or Advertising Cookies**

These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

### **What type of Targeting Cookies or Advertising Cookies do we use on our website?**

We do not currently use these types of cookies but may do so in the future. In the event that we do start to use these types of cookies we will revise this Privacy and Cookies notice accordingly to let you know what type of Targeting or Advertising Cookies we are using.

### **How do I disable/enable cookies?**

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

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

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

You can easily delete any cookies that have been installed in the cookie folder of your browser. For example, if you are using Microsoft Windows Explorer:

- open 'Windows Explorer'
- click on the 'Search' button on the tool bar
- type "cookie" into the search box for 'Folders and Files'
- select 'My Computer' in the 'Look In' box
- click 'Search Now' Double click on the folders that are found
- 'Select' any cookie file
- hit the 'Delete' button on your keyboard

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

#### **4. Use of personal information**

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

Marketing Communications. We may use your personal information to communicate with you about our products and services, and those of our subsidiaries, affiliates, and parent companies, and any of their related businesses.

Marketing analysis. We may use your personal information for internal marketing analysis, for example, to assess trends amongst our consumers or to measure the amount of traffic to our websites.

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

Forward to a friend. When you provide us with information regarding another individual, such as when you request that we send someone information from one of our websites, we will send that individual only the information you specifically requested that we send. We will not send them additional communications based on your providing us with their information. You must certify 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.

#### **5. Disclosure of personal information**

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

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

- (b) our service providers and subcontractors, including our affiliates, retained to perform functions on our behalf, or to provide services to us (such as warehousing and delivery; marketing and advertising; credit card and data processing; age verification; software development; website hosting and management; information technology and office services; legal, accounting, audit and other professional service providers; and other services related to our business), provided such service providers and subcontractors do not collect, use, or disclose the personal information for any purpose other than to perform such functions on our behalf, to provide services to us, or as otherwise required by law;
- (c) third parties who, in our reasonable judgment, are providing or seeking the information as your authorized or appointed legal agent; or
- (d) carefully selected third parties, including our affiliates, to send you third party marketing and promotional information that may be of interest. In such circumstances these organizations may be bound by confidentiality obligations and restrictions on the use of your personal information. We will obtain your express permission before we allow a third party that is not an affiliate to send you any such marketing and promotional information;
- (e) a person or entity, including our affiliates, in the event of a sale, merger, consolidation, change in control, transfer of substantial assets, financing, reorganization, or liquidation whereby we transfer, sell, or assign to such third party information concerning your relationship with us, including without limitation, personally identifiable information that you provide and other information concerning your relationship with us; and
- (f) law enforcement, governmental or regulatory agencies, or other third parties in order to comply with applicable law, or where we believe such action is necessary in order to comply with applicable law, or to detect, protect, or defend us and/or other third parties against error, negligence, breach of contract, theft, fraud, or other illegal or harmful activity, to comply with our audit and security requirements, or to audit compliance with our corporate policies, procedures, legal, or contractual obligations.

## **6. Public (or Interactive) areas of our websites**

Information that you post on or through the public areas of the site (e.g., chat rooms, bulletin boards, discussion groups, or Social Networking modules) 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 the site. Such personal information is not covered under this Privacy and Cookie Notice.

## **7. Security**

We take security seriously and take precautions to keep your personal information secure. We have put in place appropriate physical, electronic, and managerial 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.

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 Terms and Conditions for this website, which include this Privacy and Cookie Notice, you are responsible for maintaining the strict confidentiality of your account password, and you are responsible for any activity under your account and password. It is your sole responsibility to control the dissemination and use of your password, control access to and use of your account, and notify us when you wish to cancel your account. We will not be responsible or liable for any loss or damage arising from your failure to comply with this obligation.

## **8. Unsubscribe, access, questions and further information**

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

If you would like to unsubscribe from pensions communications, or from all communications about Diageo brands, please contact: [pensions@diageo.com](mailto:pensions@diageo.com)

## **9. Portfolio permissions**

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](http://www.diageobrand.com).

We occasionally may send you communications about brands not featured on [www.diageobrand.com](http://www.diageobrand.com) (e.g., new brands). We recommend that you refer to [www.diageobrand.com](http://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.

If you have any privacy-related questions, concerns or complaints, please contact: Data Privacy Officer, Corporate Centre Legal Team, Diageo plc, Lakeside Drive, London, NW10 7HQ, United Kingdom.

## **10. Interfaces with Third-Party Websites**

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

This Privacy and Cookie Notice will 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.

Diageo Pension Trust Limited (the “Trustee”) is a private company registered in England and Wales with registered number 01024205. The Trustee may be subject to scrutiny by the Pensions Regulator in the United Kingdom which is responsible for the regulation of work-based pension schemes, which includes the Diageo Pension Scheme.

You may contact the Trustee by email at [pensions@diageo.com](mailto:pensions@diageo.com) or by post to its registered office at 7HQ, Lakeside Drive, Coronation Road, London, NW10 7HQ.