

Applicant Privacy Policy



RÉMY COINTREAU

Terroir, people and time

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INTRODUCTION

Protecting your privacy and the security of your personal information is extremely important to us. This privacy policy (hereinafter the "Policy") covers the use by the Rémy Cointreau entity (hereafter the "Company" or "we") of Personal Data concerning candidates (hereinafter, "you", "your").

"Personal Data" or "Data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

You are reading this Policy because you are going to apply or have already applied to one of the Rémy Cointreau entity. This tells you how and why your Personal Data will be used as part of our recruitment process.

The Company is data controller within the meaning of the Regulation (EU) 2016/679 on the protection of Personal Data (the "GDPR") or any national applicable laws.

Addresses of Rémy Cointreau recruiting entities are mentioned in the "Addresses of our sites" section ([annex 1](#)). Mandatory references for candidates located in Asia Pacific region regarding the data protection applicable laws and data protection authorities are mentioned at the end of this Policy ([annex 2](#)).

1. INFORMATION COLLECTED

For the purpose of the application procedure, we collect and process different categories of personal data concerning you, including:

- Your identification Data, including surname and first name;
- Your contact details, including phone number and email address;
- Data about your professional career (eg: professional experiences, company, contract type, remuneration elements, references), your educational background, certifications and any other information that you provide in your CV;
- Data necessary to assess your skills and aptitude for the selected position and information on your work preferences;
- Any other Data that you communicate as part of the application procedure (for instance, during interviews) or necessary for the purposes of the data processing (please refer to section 3 - Purposes of data processing and legal basis);

We can collect your Personal Data from a third-party, such as persons indicated as referees, recruitment agencies or from recruitment platforms and social networks (for instance, LinkedIn).

2. LIMITATION OF PERSONAL DATA COLLECTED

When we collect your Personal Data as part of the application procedure, we commit ourselves to ask only Personal Data strictly necessary for the purposes of the data processing (please refer to section 3 - Purposes of data processing and legal basis).

3. PURPOSES OF DATA PROCESSING AND LEGAL BASIS

We process your Personal Data to:

- receive, consult and classify your application for the concerned position (legal basis: implementation of pre-contractual measures);
- assess your application and your aptitude for the concerned position (legal basis: legitimate interest);
- communicate with you during the application procedure and to organize interviews (implementation of pre-contractual measures);
- contact you in case of new opportunities (legal basis: legitimate interest when the Company keeps the Candidate's Data within the authorized timeframe or consent in other cases, for instance in the context of a spontaneous application);

- comply with our legal obligations (legal basis: legal obligation);
- manage and respond to potential requests and complaints (legal basis: legitimate interest);
- constitute a CV library (legal basis: consent).

If you do not communicate information indicated as mandatory during the application procedure, we will not be able to process your application. This does not apply to processing based on your consent, which does not determine the success of your application (i.e. no obligation to accept that your CV being kept in the CV Library).

If your application is successful, additional information will be requested to establish your employment contract. Information regarding the processing of your Data as a Company's employee will be provided in a specific document at that time.

4. RECIPIENTS OF THE DATA

We may share your Personal Data with the following recipients:

- the Human Resources department in charge of the recruitment procedure for the concerned position;
- depending on your application status, managers involved in the recruitment for the position concerned and any other person involved in the recruitment process;
- the persons that you have indicated as referees for your past professional experiences;
- service providers for the provision of technical and support services related to the application and recruitment process (such as hosting services, recruitment agencies or head-hunters);
- to the competent authorities and/or bodies or to third parties, as required by law or in connection with legal proceedings or other legal requests;

Where we disclose your Personal Data to third parties acting as processors (within the meaning of the GDPR), we take appropriate and necessary steps to ensure that our processors process your Personal Data in accordance with GDPR and applicable national data protection laws.

5. RETENTION PERIODS

Your Personal Data is processed for the period necessary for the purposes for which it was collected, to comply with legal and regulatory obligations and for the duration of any period necessary for the establishment, exercise or defence of legal claims.

If your application is successful, the Personal Data will be integrated into your administrative file and will be kept for the retention period applicable to it (more information is available in the Employee privacy policy).

If your application is not retained, we will keep Personal Data related to your application in a form that allows you to be identified, only for as long as it is necessary for the purposes described in this Privacy Policy, or for as long as it is necessary to comply with any legal obligation.

Companies located in the European Union will retain Personal Data related to your application for a period of two (2) years following the collect of your Data or the last contact with you, unless you opposed. At the end of this period, your Personal Data will be deleted unless you give your consent to the Company to keep your personal data for an additional period of two (2) years.

6. DATA SECURITY AND DATA TRANSFERS

Personal Data is processed both manually and electronically and is protected by appropriate security measures. We will provide an adequate level of protection for your Data and ensure that appropriate technical and organisational security measures are in place to protect your Data against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access and against all other forms of unlawful processing.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

The same level of protection is contractually imposed by the Company on all its subcontractors. Any employee of the Company who, in the course of his or her duties, may have access to your Personal Data undertakes to hold it in strict confidence.

We may transfer your Personal Data to another country outside of the UK and European Union. When we transfer your data to such third countries, we ensure an adequate level of protection for the transferred personal data by entering into data transfer agreements with the recipients of your personal data based on the European Commission's standard contractual clauses ("SCCs") or other valid transfer mechanisms. Please contact us at privacy@remy-cointreau.com if you would like to receive a copy of the safeguards in place to secure data transfers outside the UK and the European Economic Area.

7. YOUR RIGHTS

Depending on the applicable law, you may have the following rights regarding your Personal Data:

- right to be informed: You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights, which is why we are providing you with this privacy notice;

- rights of access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- right to rectification of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- right to erasure of your personal data. This enables you to ask us to delete or remove your personal data. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing;
- right to restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it;
- right to object of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground;
- right to data portability: you have the right to obtain from us and re-use your personal information to your own purposes. This only applies, however, where the processing is carried out by automated means, to personal information that you have provided to us yourself (not any other information) and where the processing is based on your consent or for the performance of a contract.
- Post-mortem right to privacy: if applicable, you may have the right to set instructions for the storage, deletion and communication of your personal data after your death.

When the Data processing is based on your consent, you have the right to withdraw your consent at any time.

In addition, you have the right to lodge a complaint with your local data protection authority. In France: the Commission Nationale de l'Informatique et des Libertés (CNIL) (see www.cnil.fr).

You can exercise your rights by using your account settings or by writing to us at: privacy@remy-cointreau.com.

Please bear in mind that if we feel that your request is vague, we may discuss with you to better understand the reason for your request and ask you to provide documents proving your identity. We need to ensure that your request does not infringe any third-party rights.

8. CONTACT US

If you have any questions about this Privacy Policy or wish to exercise your rights, please contact our Data Protection Officer by sending an email to privacy@remy-cointreau.com.

We may change or update this Privacy Policy at any time, so please review it regularly.
We will provide further notice of changes or updates as appropriate.

9. ADDITIONAL INFORMATION REGARDING CALIFORNIA AND OTHER US STATES

This California section applies to California residents, as well as residents of the United States in General, and supplements the information provided above in the Policy.

The following entities act as Data controllers for the processing your Personal Data in the context of recruitment (i.e., for the purpose of carrying out and managing the application and selection process):

- Remy Cointreau USA, 3 Times Square 20Fl, 10036 – NEW YORK CITY - NY;
- Each entity of the Remy Cointreau Group listed in appendix 1

Collection and Disclosure of Personal Information

In the United States, “Personal Data” means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

The following chart details which categories of Personal Information we collect from you and process, as well as which categories of Personal Information we disclose to third parties for our operational business and hiring and recruitment purposes, including within the 12 months preceding the date this Policy was last updated.

In addition to this section, we will keep any paper files/notes collected about you in the U.S.

Information	Data Usage
<p>Identifiers, such as name, postal address, unique personal identifiers, IP address, email address, account name, online identifiers, and government-issued identifiers (e.g., Social Security number).</p>	<p>Our affiliates; service providers that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, expense management, IT, and other services; professional advisors such as lawyers; public and governmental authorities, such as</p>

	regulatory authorities and law enforcement; business partners.
Personal information as defined in the California customer records law , such as name, contact information, government-issued identifiers, and financial, education, and employment information.	Our affiliates: service providers that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, expense management, IT, and other services; professional advisors such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement; business partners.
Protected Class Information , such as characteristics of protected classifications under California or federal law, such as sex, gender, race, disability, citizenship, military/veteran status, gender identity and expression, primary language, and immigration status.	Our affiliates: service providers that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement.
Commercial Information , such as travel information and expenses.	Our affiliates: service providers that provide services such as travel arrangements and expense management, IT, and other services; public and governmental authorities, such as regulatory authorities and law enforcement.
Internet or network activity information , such as browsing history and interactions with our website or online application portal.	Our affiliates: service providers that provide services such IT, and other services; public and governmental authorities, such as regulatory authorities and law enforcement.

<p>Geolocation Data, such as approximate location of devices used to access our website or online application portal, derived from IP address.</p>	<p>Our affiliates: service providers that provide services such IT, and other services; public and governmental authorities, such as regulatory authorities and law enforcement.</p>
<p>Audio, electronic, visual, and similar information, such as photographs.</p>	<p>Our affiliates: service providers that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement.</p>
<p>Education Information subject to the federal Family Educational Rights and Privacy Act such as student transcripts, grade point average, grades, academic standing, and confirmation of graduation.</p>	<p>Our affiliates: service providers that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors, such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement; business partners.</p>
<p>Professional or employment-related information, such as work history and prior employer, information from reference checks, work experience, qualifications, training and skills, work authorization, CV, résumé, cover letter, professional and other work-related licenses, permits and certifications held, and publicly accessible information posted on your professional social media accounts.</p>	<p>Our affiliates: service providers that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors, such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement; business partners.</p>

<p>Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences, characteristics, predispositions, and abilities.</p>	<p>Our affiliates: service providers that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors, such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement; business partners.</p>
<p>Sensitive Personal Information.</p> <ul style="list-style-type: none"> Personal Information that reveals an individual's Social Security, driver's license, state identification card, or passport number; account log-in; racial or ethnic origin, citizenship, immigration status, or union membership; Personal Information collected and analyzed concerning an individual's sex life or sexual orientation. 	<p>Our affiliates: service providers that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors, such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement.</p>

We do not sell your Personal Information, including Sensitive Personal Information, and we do not "share" your Personal Information, including Sensitive Personal Information, for purposes of cross-context behavioral advertising, as defined under the California Consumer Privacy Act. We have not engaged in such activities in the 12 months preceding the date this Policy was last updated.

Purposes for the Collection, Use, and Disclosure of Sensitive Personal Information

We collect, use, and disclose Sensitive Personal Information for purposes of: performing services on behalf of our business; performing services and providing goods as requested by you; ensuring the quality or safety of services we control or improving those services; ensuring the security and integrity of our infrastructure and the individuals we interact with; receiving and processing your job application; evaluating your suitability for the position(s) you are applying for; making you an

offer (subject to our discretion); short-term transient use; securing the access to, and use of, our facilities, equipment, systems, networks, applications, and infrastructure; preventing, detecting, and investigating security incidents; resisting and responding to fraud or illegal activities; and other collection and processing that is not for the purpose of inferring characteristics about an individual. We do not use or disclose Sensitive Personal Information for additional purposes.

Individual Rights and Requests

You may, subject to applicable law, make the following requests:

1. You may request that we disclose to you the following information:
 - a. The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
 - b. The business or commercial purpose for collecting Personal Information about you; and
 - c. The categories of Personal Information about you that we disclosed and the categories of third parties to whom we disclosed such Personal Information.
2. You may request that we correct inaccuracies in your Personal Information.
3. You may request that we delete Personal Information we have collected from you.

We may deny a deletion request where retaining the information is necessary for Us or our service providers. For example, data may need to be kept to:

- Complete a transaction for which We collected the personal information, provide a good or service requested by You, or as reasonably anticipated within the context of Your relationship with Us or to otherwise perform a contract between You and Us;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity;
- To identify and repair errors that impact existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- Compliance with the California Electronic Communications Privacy Act;
- Research in the Public Interest;
- Comply with a legal obligation;
- Enable solely internal uses that are reasonably aligned with expectations based on Your relationship with Us; or
- Otherwise use personal information, internally, in a lawful manner that is compatible with the context in which You provided Us the information.

4. You may request to receive the specific pieces of your Personal Information, including a copy of the Personal Information you provided to us in a portable format.

To submit a request please follow the process outlined in Section “contact us”. Only You or a person that You authorize to act on Your behalf, may make a request related to Your personal information. You may also make a verifiable consumer request on behalf of Your minor child.

To initiate a request, you must provide sufficient information that allows us to reasonably verify You are the person about whom We collected personal information or an authorized representative of the person who wishes to make a request.

We may not be able to respond to Your request or provide You with personal information if We cannot verify Your identity or authority to make the request and confirm that the personal information relates to You. The information provided to submit a request will only be used for the purpose of the request.

Contact Us

If you have questions or requests, please feel free to contact us at privacy@remy-cointreau.com or

RCUSA Inc
Compliance Data Privacy
3 Times Square #20 Fl
New York City, New York 10036

You can also use the or use the following web form: [Individual Request Form](#)

Because email communications are not always secure, please do not include sensitive information in emails that you send to us.

Timing

We will endeavor to respond to a verified consumer request within 30 days. If We require more time, we will inform you of the reason and extension in writing.

We do not charge a fee to process or respond to a verified consumer request unless it is excessive, repetitive, or manifestly unfounded. If We determine that the request warrants a fee, we will provide explanation and a cost estimate prior to completing the request.

You may only make a request for access or data portability twice within a 12-month period.

Authorized Agents

If an agent would like to make a request on your behalf as permitted by applicable law, the agent may use the submission methods noted in the section entitled “Individual Rights and Requests.” As part of our verification process, we may request that the agent provides, as applicable, proof concerning their status as an authorized agent. In addition, we may require that you verify your identity as described in the section entitled “Individual Rights and Requests” or confirm that you provided the agent permission to submit the request.

Non-Discrimination

We will not discriminate against You for exercising any of Your privacy rights.

Annex 1: Addresses of our Sites

Legal entity	Address
Bruichladdich Distillery Company Ltd	The Bruichladdich Distillery Islay, Argyll PA49 7UN United Kingdom
Caves de France Ltd	Room 2101-2, 148 Electric Road, North Point, Hong Kong
CLS Rémy Cointreau	21 rue Balzac 75008 Paris France
Cointreau SA	Carrefour Molière 49124 Saint Barthélemy d'Anjou France
Domaine des Hautes Glaces	35 Route du Col 38710 Cornillon-en-Trièves France
E. Rémy Martin & C°	20 Rue de la Société Vinicole 16100 Cognac France
Financière Rémy Cointreau S.A / NV	120 Avenue Louise CP 1050 Ixelles Belgium
Maison Psyché	21 rue Balzac 75008 Paris France
Mount Gay Distilleries	Mount Gay Rum Distilleries LTD – Brandons, Spring Garden, St Michael Barbados
Rémy Cointreau Belgium	Hermeslaan 9 1831 Diegem Belgium
Remy Cointreau Europe & MEA	Route de Pré-Bois 20 P.O. Box 1875 1215 Genève 15 Switzerland
Rémy Cointreau France Distribution	21 rue Balzac 75008 Paris France
Rémy Cointreau International Marketing Services	Rue Joseph Pataa 16100 Cognac,

	France
Rémy Cointreau International PTE Ltd	152 Beach Road #33-01/04 Gateway East SINGAPORE 189721, Singapore
Rémy Cointreau Japan KK.	Nisso Bld.F6, 1-11-10 Azabudai, Minato City, Tokyo 106-0041 Japan
Remy Cointreau Luxembourg SA	Bohey 36 L-9647 Doncols Luxembourg
Rémy Cointreau Malaysia SND BHD	Unit 102 & 103, Level 1, Menara KEN TTDI, 37 Jalan Burganuddin Helmi, Taman Tun Dr Ismail, 60000 Kuala Lumpur, W.P. Kuala Lumpur, Malaysia
Rémy Cointreau Nederland BV	Saturnusstraat 46-62, 2132 HB Hoofddorp, Netherlands
Rémy Cointreau Shanghai Ltd	43F, Tower 2 Grand Gateway 3 Hong Qiao Road, Shanghai China
Rémy Cointreau Taiwan PTE. Ltd. Taiwan Branch	5F., No 167 Sec.2, Nanjing East Road 104 Taipei Taiwan
Rémy Cointreau UK Distribution Limited	Newlands House, Third Floor, 40 Berners Street W1T 3NA London United Kingdom
Rémy Cointreau USA	3 Times Square #20F - New York City 10036 - NY United States
Rémy Cointreau South Africa Proprietary Limited	PO Box 651129 - Benmore – Benmore - Gauteng 2010 South Africa
Rémy Concord Limited	Room 2101-2, 148 Electric Road, North Point, Hong Kong

S&E&A METAXA	6, Andrea Metaxa street, 14564 KIFISSIA, Greece
Shanghai Rémy Cointreau Trading Ltd.	Room 467, 4 / F, Building 2, 875 Qiuxing Road, Nicheng Town, Pudong New District, Shanghai, China
Telmont	1 avenue de Champagne 51480 Damery France
Westland Distillery Company ltd	2931 First Avenue South, Suite B Seattle, WA, 98134 United States

Annex 2: Addendum for Asia Pacific region

- Reference to Data Protection Applicable Law
 - Singapore: Personal Data Protection Act (PDPA) 2012
 - Malaysia: Personal Data Protection Act (PDPA) 2010
 - Philippines: Data Privacy Act (DPA) 2012
 - Japan: Act on the Protection of Personal Information (APPI) 2003 amended in 2017 and 2022

- Reference to DP Authority and claim contact
 - Singapore: Personal Data Protection Commission (virtual chatbot) +6563773131
 - Malaysia: NATIONAL DIGITAL DEPARTMENT <http://www.pdp.gov.my/index.php/my/> +603 8000 8000
 - Philippines: National Privacy Commission (info@provacv.gov.ph) +63253221322
 - Japan: <https://www.ppc.go.jp/en/contactus/> Personal Information Protection Commission (PPC) - Telephone: 03-6457-9849 (in Japanese only) or Telephone:03-6457-9794

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