

**CONSTELLATION BRANDS, INC.**  
**GLOBAL ONLINE PRIVACY POLICY**

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Effective Date: [insert date]

This Privacy Policy describes how [insert brand], Constellation Brands, Inc. and its subsidiaries and affiliates (collectively, "we," "our" or "us") collect, use and disclose information about visitors and users (collectively, "users") of our websites, mobile applications, and other online features, products, and services that link to this Privacy Policy (each a "Service" or collectively, "our Services"). You can identify the brand that hosts or provides a particular Service through the website's footer, "About" link, or as identified directly above. By visiting or using our Services, you consent to us gathering and processing information about you in accordance with this Privacy Policy.

**Information We Collect and Receive about You**

By visiting or using our Services, we may collect the following categories of personal information ("Personal Information") you provide to us:

- Identifiers:
  - Birthdate;
  - Name;
  - Demographic information (such as your gender);
  - Email address;
  - Telephone number;
  - Mailing address; and
  - Username and password;
- Commercial information:
  - Credit card number and payment information;
  - Details of transactions that you carry out through our Services and the fulfillment of your orders;
  - Loyalty account information; and
- Any other Personal Information you volunteer, including in the order notes, in relation to a promotion (including contests, sweepstakes, offers, and rebates) or survey, or on any of our community forums, social media offerings or blogs.

We may from time to time request you post comments and images from your social media account(s) (including, but not limited to, Instagram, Twitter and Facebook) with certain hashtags. In certain instances, if you add those hashtags to your image, depending upon your social media privacy settings, the image may be redisplayed on our Services. While you retain ownership of the image, using the hashtags we request gives us permission to display and re-display the image. The image may contain information about you, and we may collect and use that information for marketing and research purposes. If you do not want your image posted on our Services, please do not use our requested hashtags.

In addition, we may receive certain categories of Personal Information listed above from sources other than you, specifically from third-party applications (including, but not limited to, Instagram, Twitter and Facebook) that you use in conjunction with this Service (e.g., for age-gating purposes), as well as from our other brands, affiliates, subsidiaries, business partners, and third-party data providers, which we may combine with the information you have provided for the purposes described in this Privacy Policy.

We may also automatically collect the following categories of network activity and/or device information (some of which may qualify as "Personal Information" or "Personal Data" under applicable law) from devices (e.g., mobile, computer, laptop, tablet) used to visit or use our Services ("Device Information"):

- IP address;
- Device identifier;

- The website you visited before using our Services;
- Browser type;
- Any search terms entered on or through our Services;
- General location data based on your Device Information, such as country, state or province;
- Computer operating system;
- Access times;
- Usage patterns and page views within our Services;
- Log files;
- Cookies;
- Clear gifs; and
- Flash LSOs.

For Services related to our mobile applications, we may also collect precise geo-location information from your device with your consent in accordance with applicable law. If you do not consent to collection of this information, certain Services (e.g., personalized location-based services and content) will not function properly and you will not be able to use those Services. You can stop our collection of location information at any time by changing the preferences on your mobile device.

Personal Information and Device Information are collectively referred to as "information." Information may be combined to assist us with drawing inferences or otherwise as may be relevant to the purposes for which the information was collected, as described below.

We will retain your information for the period necessary to fulfill the purposes outlined in this Privacy Policy and as otherwise needed to comply with applicable law and internal company policies.

#### **The Business and Commercial Purposes for which We Use Your Information**

We may use the information we collect from you to:

- Provide you with information, services, and products offered on or through our Services, including products from across our portfolio of brands that we believe you might be interested;
- Administer our loyalty programs;
- Develop new products and services;
- Provide, with your consent, information, services, and products to our customers;
- Track responses to our emails and advertisements and to measure the success of our marketing campaigns;
- Respond to or follow-up on your comments, inquiries, or other requests;
- Communicate with you about your account or use of our Services;
- Improve the quality of our websites, services, and products, and tailor them to your preferences;
- Implement social networking features you have activated (e.g., Facebook "Like" button); and
- Communicate with you about special offers and other marketing communications.

We may also use precise geolocation, where you have provided your consent for us to collect such information, to provide location-based services and content, as well as to understand traffic patterns in and around our retail locations.

We also use your birthdate to verify that you are of legal drinking age, as we are in the business of selling alcoholic beverage products.

In addition, we use your information for compliance with our company policies and procedures, for accounting and financial purposes, and as otherwise consented to by you and as required or permitted by law. If you do not provide us with information as described above, we may not be able to fulfill the applicable purpose of collection, such as to respond to your queries or provide our Services to you.

We also use your information as described in the section "How We Use and Share Your Information for Other Purposes" of this Privacy Policy.

### **How We Share Your Information for Our Business Purposes**

From time to time, we may share with our affiliates, subsidiaries, business partners, third party service providers and authorities the following categories of information: Identifiers; Commercial Information; Device Information.

This information may be shared in the following circumstances:

- ***Our Affiliates, Subsidiaries and Business Partners.*** We may share your information with our affiliates, subsidiaries and business partners in the US and worldwide for the purposes described above and for other general business administration purposes. By visiting or using our Services or otherwise providing us with your information, you consent to this transfer of your information throughout our network of entities. To opt-out of such disclosures, please see the "Choice" section below.
- ***Service Providers.*** We may share your information with third parties who perform functions on our behalf (e.g., hosting or operating our Services, processing credit card payments, sending email marketing communications, carrying out contests, special offers, or promotions, processing job applications, data analysis and other business support services). We do not authorize these third parties to use your information for purposes other than for which it was provided, and do not authorize these third parties to disclose that information to unauthorized parties. We require these third parties to maintain appropriate security to protect your information from unauthorized access or processing.
- ***As Required or Appropriate by Law.*** We may disclose your information to regulatory authorities, courts, government agencies and other third parties where we believe that doing so would be in accordance with or permitted or required by any applicable law, regulation or legal process, to defend the interests, rights, and/or property of us or others, or to respond to emergencies.
- ***Business Transfers.*** We may transfer your information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, brands, affiliates, subsidiaries or other assets.

In addition to the above circumstances, we may share your information with other parties as directed by you or subject to your consent. We may also share and otherwise process aggregated information or de-identified information that does not identify you individually with other parties. For example, we may share aggregated statistics about pages viewed on our websites or Services, demographic information and sales, and other shopping information with third parties to enrich your visitor experience.

### **How We Share Your Information for Other Purposes**

We may also share with our affiliates, subsidiaries, business partners and other third parties the following categories of information: Identifiers; Commercial Information; Device Information, which may use this information for purposes other than strictly operational purposes. You may have the right under applicable law to opt out of or object to such sharing as described below in the "[Choices and Rights](#)" section of this Privacy Policy. In certain jurisdictions, such sharing may be considered a "sale" of information. The purposes for which we have shared your information in this context are: analytics, marketing, retargeting.

### **Cookies and Similar Technologies**

When you use our Services, we along with our affiliates, subsidiaries and third-party service providers may use "cookies" and similar technologies (e.g., beacons, log files, pixels and Flash LSOs) (collectively, "technology"). This technology involves placing small files/code on your device or browser that serve a number of purposes, such as remembering your preferences (e.g., language) and generally improving your experience on or with our Services. Specifically, we may use such technology for purposes such as to:

- Provide us with general analytics about our Services, including demographic information in a non-identifiable form, in order to improve our Services' performance and customize users' experience;
- Support security measures, such as requiring re-login into your account;

- Allow you to engage in our social media offerings on our Services (e.g., Facebook "Like" button); and
- More effectively market our Services and advertise other Services (including the Services of products from across our portfolio of brands) that may be of interest to you.

Where required by law, we collect your consent for the use of such technologies.

**Cookies.** A cookie is a small text file saved on your device or browser. Some of these cookies are necessary for the functioning of our Services (known as "Strictly Necessary" cookies), while others are not (known as "Non-Essential" cookies). Some cookies (known as "persistent cookies") will remain on your device until you delete them, while others (known as "session cookies") are automatically erased when you exit your Internet browser.

You can set your device or browser to accept or reject most cookies, or to notify you in most situations that a cookie is offered so that you can decide whether to accept it. However, if you block cookies, certain features on our Services may not function. Additionally, even if you block or delete Cookies, not all tracking will necessarily stop.

We may place or recognize technology on your browser or device when you visit or use our Services for purposes of serving you targeted advertising (also referred to as "online behavioral advertising"). We also work with third party advertising companies who place their own cookies or similar technology on your browser or device when you visit or use our Services and other websites to serve customized advertisements to you as you browse the Internet. As noted above, you can set your device or browser to accept or reject most cookies, or at least notify you in most situations that the technology is offered. In addition, the advertising companies we engage participate in one of the following self-regulatory programs for online behavioral advertising, which provide the corresponding user opt-outs:

- Networking Advertising Initiative (<http://www.networkadvertising.org/choices/>) (US Only)
- Digital Advertising Alliance (<http://www.aboutads.info/choices/>) (US Only)
- European Interactive Digital Advertising Alliance (<http://www.youronlinechoices.eu/>) (EU Only)
- Digital Advertising Alliance - Canada (<http://youradchoices.ca/choices>) (Canada Only)
- DAA App Choices Mobile App (**Mobile Devices Only**) - For mobile devices (e.g., smartphone, tablets), you may consider downloading the DAA AppChoices Mobile App to manage such technology.

Please note that even if you reject such technology, you may continue to receive advertisements, but the advertisements will not be tailored to your browsing activities and interests.

**Log Files.** We automatically gather log files, such as your IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp, and clickstream data when you use our Services. We may combine information in log files with your information.

**Clear Gifs (Web Beacons/Web Bugs/Embedded Pixels).** Clear Gifs are embedded on our Services and are about the size of the period at the end of this sentence. The information collected by these technologies is associated with other technology and information, but only for internal tracking purposes only.

**Flash LSOs.** Flash Local Storage Objects ("Flash LSOs"/"Flash Cookies") display content based upon your preferences for how you like to view our Services. Flash LSOs are different from browser cookies because of the amount of, type of, and how information is stored. Cookie management tools provided by your browser will not remove Flash LSOs. To learn how to manage privacy and storage settings for Flash LSOs, [click here](#).

**Third party applications and APIs.** We also offer and deliver services, content or interactive features through and/or using third-party application programming interfaces, gadgets, and/or extensions that are hosted on our Services or through other third-party websites or social networking platforms. When you use these services, content, or interactive features, or otherwise connect with, or "accept" or "allow" third party applications, networks, platforms or services through our Services, you are authorizing those third parties to receive your information and additionally to potentially share any or all of your information with us, based on your privacy or

other settings on the particular third-party network or platform. Any information we receive by these means will be treated and/or processed according to this Privacy Policy.

### **Choices and Rights**

**Email.** If you no longer wish to receive email marketing communications from us, you may opt-out of receiving marketing-related emails by using the unsubscribe method provided in our communications (e.g., by clicking on the "unsubscribe" link in the email to unsubscribe). Alternatively, to the extent that applicable law requires your prior opt-in consent to receive marketing and promotional emails, we will ask for your consent and you can choose not to opt-in.

**Text Messages.** If you no longer want to receive text messages from us, reply STOP (or as otherwise instructed) in the text message. Alternatively, to the extent that applicable law requires your prior opt-in consent to receive text messages, we will ask for your consent and you can choose not to opt-in.

**Cookie Choices.** To exercise choices regarding cookies set through our Services, as well as other types of online tracking and interest-based advertising, see the ["Cookies and Similar Technologies"](#) section above.

**Sharing with Third Parties.** In addition to the above methods of exercising choice, to the extent required by applicable law, we also provide you the ability to opt out of sharing your information with certain third parties for their own use by contacting us as detailed in the ["Contact Us"](#) section below. You may also send requests about your contact preferences related to the items listed above or changes to your information to us as detailed in the ["Contact Us"](#) section below.

**Your Rights.** If you have created an online account with us and would like to update the information you have provided to us, you can access your account to view and make changes or corrections to your information. Depending on applicable law, you may have the right, and we also provide you with the opportunity to be informed of whether we are processing your information and to access, correct, update, oppose, delete, block, limit or object, upon request and free of charge, to our use of your information to the extent required by applicable law. For such inquiries, please contact us as detailed under the ["Contact Us"](#) heading below. We will try to comply with your request as soon as reasonably practicable and as required by applicable law. Please note that we may need to retain certain information for recordkeeping purposes, to complete any transactions that you began prior to your request, or for other purposes as required or permitted by applicable law. In any event, should you choose to exercise any of your rights as detailed above, we will not discriminate against you by offering you different pricing or products, or by providing you with a different level or quality of products, based solely upon this request.

### **Security of Your Information**

We take commercially-reasonable technical, administrative, and physical security measures to protect your information, including generally accepted industry standards to protect the information submitted to us during transmission and once we receive it. When you provide us sensitive information (e.g., credit card number), we encrypt that information using secure socket layer technology ("SSL") or similar technology. However, no method of transmission over the Internet, or method of electronic storage is 100% secure, so we unfortunately cannot guarantee absolute security. If you have reason to believe that your interaction with us is no longer secure (e.g., if you feel that the security of any account you might have with us has been compromised), please contact us immediately as detailed under the ["Contact Us"](#) heading below.

### **International Transfers**

Some of the parties identified above may be located in countries that do not provide an equivalent level of protection as your home country. Where required, we have taken appropriate measures to allow and secure the transfer of information about you to these recipients for the purposes described above and in order to comply

with local data privacy laws. By using some of our Services, and providing us information about you, you consent to the international transfer of information about you to the above parties.

### **Links to Other Websites**

Our Services may contain links to other websites or services that are not owned or controlled by us, including but not limited to links to websites of our advertisers, sponsors, and partners. This Privacy Policy only applies to information collected by our Services. We have no control over these third-party websites, and your use of third party websites and features are subject to privacy policies posted on those websites. We are not responsible or liable for the privacy or business practices of any third-party websites linked to our Services. Your use of third parties' websites linked to our Services is at your own risk, so we encourage you to read the privacy policies of any linked third-party websites when you leave one of our Services.

### **No Data Collected from Children/Minors/Those Under the Legal Drinking Age**

Our Services are intended only for those of legal drinking age and we do not knowingly collect information from individuals under the legal drinking age, children or minors. If we have actual knowledge that information about a child has been collected, we will take the appropriate steps to delete the information.

### **Information for California Residents**

If you reside in California, we are required to provide additional information to you about how we use and disclose your Personal Information, and you may have additional rights with regard to how we use your Personal Information. We have included this California-specific information below.

Consistent with the "[Information We Collect and Receive About You](#)" section above, we collect certain categories and specific pieces of information about individuals that are considered "Personal Information" in California ("CA Personal Information"). As detailed above, we may collect this CA Personal Information from you and other third parties. We collect, share and disclose CA Personal Information for the business and commercial purposes described in the "[The Business and Commercial Purposes for which We Use Your Information](#)", "[How We Share Your Information for Our Business Purposes](#)" and "[How We Share Your Information for Other Purposes](#)" sections above.

Under California's "Shine the Light" law, if you are a California resident who provides Personal Information in obtaining products or services for personal, family, or household use, you may request to opt-out of such sharing by a brand at no-cost by following the instructions in the "[Choices and Rights](#)" section above, or by contacting us as detailed in the "[Contact Us](#)" section below. Please be aware that your opt-out will apply only to the sharing by that particular brand.

Subject to certain exceptions, as a California resident, you have the right to: (i) access your CA Personal Information; (ii) obtain deletion of your CA Personal Information; (iii) receive information about the CA Personal Information about you that we have "sold" (as such term is defined under California law) to third parties within the past 12 months; and (iv) opt-out of the "sale" of your CA Personal Information.

- **Do Not Sell My Information.** In addition to the above, California residents have the right to opt-out of the "sale" of their Personal Information, as such term is defined under the California Consumer Privacy Act. To exercise this right, click here [[insert link to Contact Us Wilke iFrame here](#)]
- **Exercising Other California Consumer Rights.** Should you wish to request the exercise of your other rights as detailed above with regard to your Personal Information, we will not discriminate against you by offering you different pricing or products, or by providing you with a different level or quality of products, based solely upon this request. Please see the "[Contact Us](#)" section below if you have questions or would like to exercise such rights.

### **Changes to this Privacy Policy**

Except to the extent limited by applicable law, we reserve the right to update this Privacy Policy to reflect changes to our information practices by prominently posting notice of the update on our Services. Any updates will become effective immediately after posting the updates to the Privacy Policy and apply to all information collected about you. If we make any changes to this Privacy Policy that materially impact previously collected information about you, we will, to the extent that we have your email address, notify you by email.

### **Contact Us**

If you have any questions about this Privacy Policy or information we have collected about you, or to exercise your rights as detailed above, please contact us online here [[insert link to Contact Us Wilke iFrame here](#)], by email at [privacy@cbrands.com](mailto:privacy@cbrands.com), by phone at 1-866-538-1862 or by postal mail at:

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