

EDRINGTON



OUR PEOPLE RECRUITMENT PRIVACY POLICY – MEXICO

Last Updated 21 August 2023

Edrington Mexico with domicile at Javier Barrios Sierra 495, Piso 1, Ofic 01-116, Santa Fe, 01376, Alvaro Obregón, Ciudad de Mexico. Processing of personal data relating to our recruitment process as described in this privacy policy is undertaken by Edrington Mexico and its ultimate parent company, The Edrington Group Limited, a private limited company (registered in Scotland No.SC036374), with its registered office at 100 Queen Street, Glasgow, G1 3DN, as well as other group companies, where relevant – details of these companies can be found in Appendix A.

In this privacy policy, The Edrington Group Limited and the relevant Edrington group companies are referred to as **Edrington, we, us** or **our**. Edrington is the data controller in relation to the processing of your personal data described in this privacy policy.

Edrington is committed to safeguarding the privacy of the personal data that we hold concerning our prospective, current and former employees (“you” or “people”) for management, human resources and payroll purposes. If you are successful in your application to work at Edrington your personal data will continue to be used by Edrington and we will provide you with our employee privacy policy when you start.

We have appointed a Group Data Privacy Manager. If you have any questions about this privacy policy or how we handle your personal data, please contact us at dataprotection@edrington.com.

Personal data collected

In this privacy policy, ‘your personal data’ means information about you from which you can be identified. Appendix B lists your personal data that we may process as part of our recruitment process. This does not include data where your identity has been removed (anonymous data).

Collection of personal data

The personal data is either (a) provided by you, (b) obtained from third parties, (normally through the application and recruitment process), or (c) created by us in the course of job-related activities during your employment/engagement with us. Data may be obtained from the following third parties (former employers, employment agencies, recruitment agencies, credit reference agencies or other background check agencies).

It is important that your personal data is accurate and up to date. Please keep us informed if your personal data changes during the recruitment process.

Information about criminal convictions

We will only collect personal data about criminal convictions via background screening if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you.

We will use information about criminal convictions and offences in the following ways (1) where it is necessary to protect your interests, our interests and those of other employees or to protect clients and other third parties from theft, fraud and similar risks; and (2) where it is necessary in relation to legal claims. We may use your

EDRINGTON



personal data in this way where it is necessary to carry out our employment rights and obligations and in accordance with our data protection policy.

Sensitive personal data

We may use sensitive personal data for the purposes of performing services for our business, providing services as requested by you and ensuring the safety, security and integrity of our business, infrastructure and the individuals with whom we interact.

This includes, without limitation, establishing and maintaining your employment relationship with us, ensuring the safety and diversity of our workforce, designing and implementing ESG initiatives, complying with legal obligations, defending or asserting legal claims, and securing the access to, and use of, our facilities, equipment, systems, networks, applications, and infrastructure.

We will only use your diversity sensitive personal data (please see Appendix B for details of this data) for the purposes described below, if you provided these data and if you consented for these purposes of our processing. The refusal to give or use your diversity sensitive personal data for these purposes will not affect your recruitment process.

Processing your personal data

Our purpose for processing your personal data is to assess your suitability for a role you have applied for and to help us develop and improve our recruitment process. In general, we process your personal data to:

- Carry out background and reference checks, where applicable;
- Determine the terms of which you may work for us, and advise you of these;
- Check you are legally entitled to work in the country where you have applied for a role;
- Contact you;
- Carry out an interview with you, which may be by video;
- Make decisions about salary and compensation;
- Assess qualifications and suitability for a job or task;
- Manage flexible working applications;
- Consider reasonable adjustments, where relevant;
- Carry out education, training and development;
- Carry out equal opportunities monitoring;
- Comply with health and safety obligations;
- Establish, exercise or defend legal claims; and/or
- Comply with the law or requirements of a regulator.

We do not envisage taking any decisions about you based solely on automated processing (i.e. without human involvement), which have a legal or similarly significant effect on you.

Personal data necessary for the contract / statutory requirements

Appendix B sets out your personal data that is necessary for us to enter into an employment contract with you. If you don't provide this data, we may not be able to enter into the contract. For example, if you don't provide us with your bank details, we may not be able to pay you.

In some circumstances, the provision of your personal data is a statutory requirement. This includes:

- Documentation confirming your right to work in the country where you have applied for a job – if you don't provide this, we may not be able to enter into an employment contract with you;

EDRINGTON



- Statutory information you must provide to us if you wish to claim any statutory payments – if you don't provide this, we may not be able to comply with our legal obligations and/or provide relevant benefits to you; and/or
- Information required for us to carry out background screening where this is relevant to your role – if you don't provide this, we may not be able to carry out such screening and/or enter into an employment contract with you.

What are your rights?

You have a number of rights under the data protection laws in relation to the way we process your personal data, namely:

ARCO RIGHTS, REVOCATION OF CONSENT AND LIMITATION OF USE OR DIVULGEMENT

- **Access:** you can access your personal data;
- **Rectification:** you correct your personal data if you don't think it is accurate, complete or up-to-date;
- **Cancellation:** you can ask us to delete your personal data if:
 - It is no longer necessary for the purposes for which we obtained it;
 - You withdraw your consent, and we have no other legal basis for the processing;
 - We have unlawfully processed the data; or
 - We must delete the data to comply with a legal obligation;
- **Opposition:** you can inform us that you do not wish your personal data to be used for a specific purpose.

If you would like to exercise any of the above ARCO rights, you may do so at any time by deleting this from your candidate profile or by contacting us at dataprotection@edrington.com stating: (i) the ARCO right you wish to exercise; or (ii) your wish to limit the use or disclosure of your personal data; or (iii) that you want to revoke your consent.

If you consider that your personal data processed by us or any other information provided by us with respect to you, is incorrect we will appreciate if your indicating so as soon as possible, by written notice to dataprotection@edrington.com.

We will verify and respond to your request in accordance with applicable law and we may need to request additional information to verify your request. Please note that we may be unable to delete or remove your personal data which we need as part of your employment with Edrington.

Who do we share your personal data with?

With respect to the transfer of your personal data, we are authorized to exchange data that we have received from you with other employees and companies in our group, which have our same data protection policies, and/or with authorized third parties with whom we maintain a legal relationship, whether national or foreign, and/or with any competent authority, to insurance companies for the administration of any matter related to the employee insurance policy; banking institutions to administer the payment of your salary and other related banking services.

Additionally, we may carry out national or international transfers of personal data to third parties as part of the following operations or transactions, present or future, in which we participate: for administrative, management and accounting purposes, and as part of our regular reporting activities on company performances, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

EDRINGTON



The access to, and the transfer or remittance of, your personal data is limited to those activities that are required to fulfil our responsibilities in the ordinary course of business to comply with our contractual, regulatory, internal and/or commercial obligations and are limited to the purposes of this privacy policy.

To effectively fulfil our obligations to you, including managing our recruitment process, and to provide you with certain benefits, we use a number of trusted and reliable third parties to carry out functions which involve the processing of your personal data such as pre-employment screening providers, video interview providers and psychometric assessment providers. We also use an online application system to process your personal data as part of the recruitment process.

When sharing your personal data in the above circumstances, we will also fulfil other statutory obligations as may be required by the applicable laws, such as informing you of the details of the receivers and obtaining your separate consent.

Where is your personal data stored?

Edrington is a global company with our headquarters based in the UK and so your personal data will most likely be transferred outside of Mexico and stored in the UK.

We may transfer your personal information outside of Mexico for the purposes listed above. There is either: (1) an adequacy decision under data protection law in respect of that country, meaning that it is deemed to provide an adequate level of protection for your personal information; or (2) we have put in place the following measures to ensure that your personal information receives adequate protection: intra-group contractual safeguards and a process for assessing and maintaining the security and integrity of IT systems used across the Edrington Group. You can access a copy of these by contacting us at the details below.

How long do we keep your personal data for?

We strive to only keep your personal data for so long as is necessary, in connection with the purpose for which we collected the personal data.

If you are unsuccessful with your application, we will retain your personal data for six months and thereafter delete it. If you are successful, your personal data will be retained in accordance with our data retention policy during your engagement and for seven years after termination, unless we have a legal requirement to retain this data for longer. You can also delete your profile at any time by selecting the 'Delete Profile' option through our recruitment platform.

Questions

If you have any questions about the way in which your personal data is processed, please contact us at dataprotection@edrington.com.

Security

We follow strict security procedures as to how your personal data is stored and used, and who sees it, to help stop any unauthorised person accessing it.

Changes

This policy will be changed from time to time. If we change anything important about this privacy policy (the information we collect, how we use it or why) we will notify you.

EDRINGTON



Finally, in terms of the exceptions established in Article 10 of the Federal Law on the Protection of Personal Data held by Private Individuals for the obtention of consents and due to the existence of a legal labor-based relationship between you and us, it is not necessary to obtain your consent to process your personal data as previously established.

The foregoing does not apply to the processing of your sensitive personal data for the diversity monitoring purposes mentioned above, for which we will request your express consent separately and in accordance with our [Recruitment Diversity Notice](#).

EDRINGTON



Appendix A: The Edrington Group Companies

The table includes details of The Edrington Group's entities which process personal data relating to Edrington's recruitment process as described in the recruitment privacy policy. If you have any queries regarding the processing of your personal data please contact Edrington at dataprotection@edrington.com.

Company	Registered Address	Location of Registration
The Edrington Group Limited	100 Queen Street, Glasgow, G1 3DN	Scotland
Highland Distillers Limited	100 Queen Street, Glasgow, G1 3DN	Scotland
Edrington Distillers Limited	100 Queen Street, Glasgow, G1 3DN	Scotland
The Macallan Distillers Limited	The Macallan Distillery, Craigellachie, Banffshire, AB38 9RX	Scotland
Brugal & Co S.A.	Brugal & Co., S.A. is Carretera Luperón km 3 1/2, Puerto Plata	Dominican Republic
Casa Brugal RD, S.A.	Casa Brugal RD, S.A. is Avenida Núñez de Cáceres esq. Rómulo Betancourt, Downtown Business Tower, piso 11, Santo Domingo, Distrito Nacional.	Dominican Republic
Edrington Shanghai Limited	Unit 1, 19/F, Tower 1, Grand Gateway, No.1 Hong Qiao Road, Shanghai, PR China	People's Republic of China
Edrington Hong Kong Limited	Suite 1207-07 Exchange Tower, 33 Wang Chiu Road, Kowloon Bay, Hong Kong	Hong Kong
Edrington Singapore Pte Ltd	12 Marina View, Asia Square Tower 2, #24-01, Singapore 018961	Singapore
Edrington Taiwan Ltd	9F, No. 9 Songgao Road, Xinyi Dist., Taipei 110, Taiwan	Taiwan
Edrington (M) SDN BHD	16-02, Tower A, Vertical Business Suite, Bangsar South, Jalan Kerinchi, 59200 Kuala Lumpur, Malaysia	Malaysia
Edrington Middle East & Africa Ltd	4 Megalou Alexandrou Street, Aglantzia, 2121 Nicosia, Cyprus	Cyprus
Edrington Group, USA, LLC.	18 West 24 th Street, 4th Floor, New York, NY 10010, USA	Delaware, USA
Edrington Mexico, S.A. DE C.V	Paseo de los Tamarindos 90, Piso 18, Ofic 113, FIC 113, Bosques de las Lomas, 05120 Cuajimalpa de Morelos, Ciudad de Mexico.	Mexico
Maxxium Nederlands	De Cuserstraat 89 Amsterdam, 1081 CN Netherlands	The Netherlands
Maxxium BeLux	0770.344.997, Leuvensesteenweg 643 - 1930 Zaventem	Belguim
Edrington UK Distribution Limited	191 West George Street, Glasgow, G2 2LD	Scotland

EDRINGTON



Company	Registered Address	Location of Registration
Edrington Africa	3021 William Nicol Drive, Block A, Ground Floor, Bryanston 2191, Johannesburg, South Africa	South Africa
Edrington Demark A/S	Dronningens Tvaergade 9, 1302 Copenhagen, Denmark.	Denmark
Edrington Sweden AB	Luntmakargatan 46, Box 5341, 102 47 Stockholm, Sweden	Sweden
Edrington Norway AS	Rådhusgata 30b, 0151 Oslo	Norway
Edrington Finland OY	Firdonkatu 2 T 144, 00520 Helsinki	Finland
Edrington European Travel Retail Limited	100 Queen Street, Glasgow, G1 3DN	Scotland

EDRINGTON



Appendix B: Personal Data

Data marked * in the table below is 'sensitive personal data' or might disclose such information.

Your personal data	Reason for processing personal data
<ul style="list-style-type: none"> • Personal contact details (name, address, telephone number, email address, LinkedIn profile) • Application form, CV and interview notes • Correspondence and results regarding background checks • References and details of previous employers • Industry, notice period, salary expectations • Professional memberships and qualifications • Identity documents • Offer letter and contract • Work location • Start date • Flexible working arrangements • Criminal convictions and offences* • Tax and national insurance details, including national insurance number • Veteran status (US based candidates only) 	<p>Make a decision about your recruitment or appointment, including assessing your skills, qualifications and suitability for the work.</p> <p>Carry out background and reference checks, where applicable.</p> <p>Determine the terms on which you work for us and advise you of these.</p> <p>Make decisions about salary and compensation.</p>
<ul style="list-style-type: none"> • Legal gender • Health data, including disability information* • Diversity data, including ethnicity, gender identity and sexual orientation (only where specifically requested)* 	<p>Considering and implementing reasonable adjustments.</p> <p>Comply with pay gap reporting obligations.</p> <p>Monitoring diversity, equity and inclusion.</p>