

PERSONNAL DATA PRIVACY CHARTER

This charter (the 'Charter') details the policy of Établissements Nicolas SA and its subsidiary Nicolas Direct SARL (hereinafter 'Nicolas', 'we', 'us', 'our') with regard to personal data and cookies.

The purpose of this Charter is to inform you of the conditions under which Nicolas collects your personal data ('personal data'), the reasons for which this data is collected, the use that is made of it and your respective rights. It applies to all information provided by you or collected by Nicolas during your interaction(s) with us.

When we refer to our Platform, we mean any of the digital and/or physical channels and/or means that you can use to interact with us via the website. www.nicolas.com or www.vins-fins.com (the web Site), Nicolas shops, my click and collect shop, by post, e-mail or telephone

The website includes all our Nicolas sites accessible from <https://hub.nicolas.com/> and linking to the merchant site www.nicolas.com.

1. DATA CONTROLLERS

1.1 – Online Sales

For online sales (stock on the Internet) and the administration of the Site, the parties jointly responsible for processing your data are :

- **Nicolas Direct SARL**, with capital of 122,000 euros, registered in the Créteil Trade and Companies Register under SIREN number B 343 093 464, with its registered office at 1 Rue des Olivier 94320 Thiais ;
- **Établissements Nicolas SA, a public limited company with capital of 1,921,152 euros, whose registered office is at** 1 rue des Oliviers 94320 Thiais, registered with the Créteil Trade and Companies Register under SIREN number 542 066 238.

1.2 - E-booking, click & collect and telephone shopping

For the My shop online service (your shop's stock), which allows you to reserve the products you wish to buy online and pay for them in shop (e-reservation), or to order and pay for them online and then collect them from your shop (click & collect), and the telephone purchase service with online payment, the data controller is :

- **Établissements Nicolas SA, a public limited company with capital of 1,921,152 euros, whose registered office is at 1 rue des Oliviers 94320 Thiais**, registered with the Créteil Trade and Companies Register under SIREN number 542 066 238

2. THE DPO

In accordance with applicable regulations, the law firm POGGI Avocats IT, represented by Anne-Sophie Poggi, Lawyer at court, 33 avenue de l'opéra 75002 Paris, aspoggi@poggiavocats.com, has been appointed Data Protection Officer (DPO).

3. DATA CONCERNED

The personal data that we collect or that you decide to provide to us includes in particular:

Identification data: your first name, surname, title, telephone numbers, delivery/billing address, e-mail address;

- **Contractual and payment data** : bank card payment data (processed on MoneticoPaiement), data relating to your orders or returns;
- **Data relating to your online or in-store purchases** : date of purchase, shop address, products purchased, amount in basket;
- **Data relating to your interactions with our Site** (if you are logged into your account): pages visited, unfinished shopping baskets, etc;
- **Data collected via cookies and tracers** :
 - **Electronic identification data relating to your computer or telephone** : user identifier, IP address, operating system, device, browser, internet service provider, etc. and ;

- **Data relating to your browsing** : For more information on the browsing data collected, please see Article 9 on cookies;
- **Data on your approximate location** : from your IP address if you click on the 'find me' function to locate the nearest Nicolas shops.
- **Data relating to the privilege programme** : customer number, products purchased, date of purchase, amount etc....

4. YOUR RIGHTS AND COMPLAINTS

4.1 – You rights

processing of your personal data by Nicolas, you have the following rights:

- **Right of access** : the right to request a copy of your personal data. If your request is unjustified or abusive, we may charge you a fee.
- **Right of rectification** : the right to request correction of inaccurate personal data. You may access your account to modify your personal data. You must ensure that your data is accurate and up to date. You are solely responsible for any damage or loss caused by providing inaccurate or incomplete information.
- **Right to erasure** : the right to request the deletion of your data, where one of the following conditions is met:
 - o Your personal data is no longer required for the purposes for which it was collected;
 - o You have withdrawn your consent and there is no other legal basis for continuing to process your personal data;
 - o You have validly exercised your right to object;
 - o The processing of your data is not lawful;
 - o Your personal data must be deleted to comply with a legal obligation.

However, there are cases where you cannot exercise your right to erasure, even if one of these conditions is met ((in particular where the processing of your data is necessary to comply with a legal obligation or to contest, exercise or defend our legal rights).

- **Right to object**: the right to object on grounds relating to your particular situation to the processing of your personal data based on our legitimate interests. In this case, we will stop processing your data, unless we have a legitimate reason to continue processing your data. If your

data is used for commercial canvassing or advertising purposes, you have the right to object to this without having to justify yourself.

- **Right to restrict processing:** the right to request, in certain cases, the temporary suspension of the processing of some of your data or its retention, if you need it, for longer than necessary.
- **Right to portability:** if the processing of your personal data is based on your consent or the performance of the contract and if the processing is carried out by automated means, you will have the right to request receipt of your data in a structured, commonly used and machine-readable format, so that it can be transferred to another entity, provided that this is technically possible.
- **The right to define instructions** concerning the fate of your personal data in the event of your death.

4.2- Exercising your rights

These rights can be exercised directly and at any time by contacting our customer service department: either by completing the contact form accessible from the Site in the 'Contact us' section (at the bottom of the page), or by sending an email to service-clients@nicolas.com, or a registered letter with acknowledgement of receipt (LRAR) to Établissements Nicolas, Service Clients, 1 Rue des Oliviers 94320 Thiais, indicating the reason for your request.

Nicolas undertakes to deal with requests within a reasonable time and at the latest within one month.

If there is any doubt about your identity, we may ask you for a copy of your identity card or other proof of identity.

4.3- Complaints to the CNIL

You also have the right to lodge a complaint with a supervisory authority, in particular in the Member State in which you normally reside, your place of work or the place where the breach is alleged to have occurred. In France, the supervisory authority is as follows : Commission Nationale de l'Informatique et des Libertés (CNIL), 3 Place de Fontenoy – TSA 80715 – 75334 PARIS CEDEX 07, Tel : +33 1 53 73 22 22

5. PURPOSES AND LEGAL BASIS FOR THE COLLECTION AND PROCESSING OF YOUR PERSONAL DATA BY NICOLAS

5.1 - Carrying out and tracking your product reservations and purchases on the Site

Carry out your booking or purchase contract on the Site. To make a purchase or reservation on our Site, you must log in to your user account or create one. We collect and process the data necessary to execute the reservation or purchase contract that you have concluded with us, to manage payments, to issue invoices, to organise delivery, and to manage outstanding payments and returns.

Managing your gift card. You can request a gift card from your Nicolas wine merchant. We have a legitimate interest in processing the data required to manage your gift card.

Detecting fraud. When you make a purchase, we have a legitimate interest in carrying out the necessary checks with a view to detecting and preventing possible fraud.

Suggest nearby shops to you. If you agree to share your location, we can show you nearby shops. By clicking on the 'find me' button and allowing Nicolas to know your location, we use your IP address to determine your approximate position and show you the nearest shops.

5.2 -Execute and track your orders and product purchases by telephone

You can make a purchase by contacting a Nicolas shop by telephone. You will need to provide the information required to process your order and will receive an order form by e-mail. After validation, you will be invited to proceed to payment via a payment link valid for 24 hours. The order will be delivered to the shop or dispatched once payment has been received. In the context of these orders, NICOLAS collects your personal data in order to be able to execute the order contract placed by telephone.

5.3 - Execute and track your orders and in-store purchases

When you make a purchase in one of our shops, our cellarmen may ask you to identify yourself if you have a privilege card, or to create a card if you do not. In both cases, our cellarmen will process the information necessary to correctly process your orders and purchases, in particular to make payments and issue the corresponding invoices. With the exception of placing an order (for example for a product not available in shop), you are not obliged to

identify yourself and may ask the wine merchant to make your purchases without creating a privilege card. .

5.4 - Respond to any questions, requests or complaints transferred to Customer Service

Request relating to an order or purchase. If your request relates to your order or a purchase via our Platform, processing is necessary for the performance of the contract and the proper management of the after-sales service. We may contact you by telephone, SMS or e-mail.

Other requests and complaints. We consider that we have a legitimate interest in processing your personal data that is strictly necessary to properly manage your requests and complaints and to answer your questions.

Recording of customer service calls. When you call our customer service department, telephone conversations may be recorded for quality control and training purposes in line with our legitimate interests. You may object to this.

Exercising your rights. If your question concerns the exercise of the rights set out in Article 3 'Your rights' or relates to a complaint about our products or services, we will need to process your data in order to comply with our legal obligations.

5.5 -Managing your user account on the Website

To make a purchase or reservation on our Site, you must create a user account. When creating your account, you will be asked to provide certain personal data necessary to identify yourself and to access the various features, services and products available to registered users. The processing of your data is required for the execution of the general conditions of use of the Site.

5.6 - Manage your Privilege Programme membership

Manage your privilege card. You can create a dematerialised privilege card online from your user account on our Site, or request a physical privilege card in a shop, which you must then activate online in your account. The processing of your data is necessary for the execution of the privilege programme, in particular to calculate your points balance and inform you when they expire.

Add your privilege card to your mobile wallet. If you add your privilege card to your mobile wallet (Apple Wallet or Google Wallet) by receiving a text

message or scanning a QR code, your device will send Apple or Google the data needed to display the card, such as its number and name. The processing of your data is governed by Apple's or Google's privacy policy and legal notices, which we invite you to consult. You can delete your dematerialised card, or deactivate push notifications and/or automatic updates from your mobile phone at any time.

Information emails about your Privilege Card. We have a legitimate interest in sending you an e-mail updating your points balance after each purchase, as well as a reminder before they expire.

5.7 - Carrying out sales prospecting and marketing activities

Email newsletters. By subscribing to our newsletter, you agree to receive promotional offers, product information, invitations to events and tips for your cellar at the email address associated with your user account. You can unsubscribe at any time from your Nicolas account in the 'Modify my personal information' tab, by contacting customer service, or by clicking on the 'unsubscribe' link at the bottom of each email. .

Push notifications to your mobile phone. If you have added your privilege card to your mobile wallet, we have a legitimate interest in sending you Nicolas offers, information and invitations by push notifications to your mobile. You can deactivate these notifications at any time from your mobile phone.

Proximity messages on your mobile. If you have added your privilege card to your mobile wallet, we have a legitimate interest in sending you messages when you are near a Nicolas shop. Your device triggers your location without any exchange with our servers, and your location data is never shared with Nicolas. You can stop receiving these messages by deactivating the notifications on your mobile

Personalized advertising through our partners. If you have a user account on our Site and have made a purchase, we may share your (encrypted) data with our partners (social networks, video-sharing platforms, etc.) to show you personalized ads for similar Nicolas products. Partners with whom you use the same username (email) as for your Nicolas account may show you our personalized ads. You can opt out of this type of communication by contacting our customer service (see section 4.2) or by changing your advertising preferences in the settings of the partner networks and platforms.

Advertising targeting carried out via cookies and trackers. If you have visited our Site and accepted advertising cookies, you consent to receive targeted advertising from Nicolas on third-party sites, social networks, and applications. You can withdraw your consent at any time by changing your preferences via the “Cookie Settings” link on the Site or by deleting the cookies saved on your browser (see chapter 9 on cookies and other trackers below).

Personalization of our communications and prospecting for people with a profile similar to yours. We have a legitimate interest in analyzing your data to create your profile, which allows us to better understand your preferences, behaviors, and needs. This allows us to adapt our offers and personalize our communications. We may also communicate with people with profiles similar to yours through our partners (e.g., social networks).

The data analyzed may include :

- Your customer account information;
- Your Privilege Card data;
- Your in-store (if you use your Privilege Card) or online purchase history;
- Your interactions with our Site (if you are logged into your account) (e.g., pages visited, incomplete shopping carts);
- Data collected via cookies you have accepted (see Chapter 9 on cookies and other trackers below).
- You can object to this profiling by contacting customer service (see Section 4.2 above).

5.8 - Competitions

If you participate in a competition via the Platform, we process the data collected for the performance of the contract relating to this competition. The data collected is only used for advertising purposes with your consent.

5.9 - Manage customer reviews

We have a legitimate interest in using your data to respond to your reviews posted online

5.10 - Conduct customer satisfaction and research surveys

We have a legitimate interest in conducting surveys and polls to analyze the level of satisfaction of our customers in order to improve the quality of our products and services.

5.11 - Produce anonymous statistics on Site traffic

We believe we have a legitimate interest in analyzing the usability and quality of our Site in order to improve our users' experience and offer a better Site to our customers. Please read Article 9 "Cookies" for more information.

5.12 - Produce business statistics

We have a legitimate interest in using your data to produce business statistics.

6 - DATA RETENTION PERIOD

The retention period for your data is determined based on the purpose for which it was collected. When this purpose is achieved, your data will be archived, deleted, or anonymized (particularly for the purpose of producing statistics).

6.1 - Shelf life on an active basis for the duration necessary for the purposes for which they were collected

Initially, Nicolas keeps your personal data for a period that does not exceed the period necessary for the purposes for which they were collected

- **Data relating to your contracts (orders, deliveries, invoices, payments, after-sales service), including the privilege program).** Retention for the purposes of executing your contract, i.e. for the duration necessary to execute the sale, the duration of your user account or the duration of your privilege card, as the case may be.
- **Data relating to bank cards used for payment.** Deletion once the transaction has been completed, i.e., upon actual payment, which may be deferred until receipt of the product, increased, where applicable, by the 14-day withdrawal period (which you have to change your mind) in the case of a purchase on our Site. If you pay by bank card, the card number and expiration date may nevertheless be retained for evidentiary purposes in the event of a dispute over the transaction, in intermediate archives, for a period of 13 months following the debit date or 15 months in the case of a deferred debit payment card.
- **Data stored in our customer and prospect databases (your identification data, your user account data, your interaction data with our Site when you are logged into your account).** Retention for a period of 3 years from your last contact with us (either an online purchase or with your loyalty card, a login to your account, an exchange with customer service, or a click on a hyperlink contained in an email) or until you withdraw your consent for processing based on the legal basis of consent (the “Contact”).
- **Your exchanges with Customer Service.** Retention for the duration necessary to process your request. Recordings of telephone conversations with our customer service are retained for a limited period (maximum 6 months) except in exceptional cases (for example, for investigative purposes, fraud, or for a legal reason).
- **Your data collected via cookies and other trackers.** Retention for a period not exceeding 13 months from your login in accordance with applicable regulations. For more details on cookies, how they work, and your ability to disable them, see our section "5. Cookies" below.
- **Your responses to our satisfaction surveys and customer studies.** 3 years after the last Contact.

- **Your customer reviews.** This data is retained for 3 years after the last Contact.
- **Your requests to exercise your rights.** This data is retained for 1 year from the response to requests to exercise your rights. Statistical data. The statistical data retained is aggregated (compiled) and anonymous.

6.2 - Duration of archiving

Secondly, regardless of the retention period required to achieve the purpose of data processing, we may be justified in archiving your data for a limited period, securely and with restricted access, for various reasons:

- To comply with a legal obligation to retain data (Article L123-22 of the French Commercial Code requires the retention of accounting documents and supporting documents, such as invoices, for a period of 10 years; similarly, Articles L213-1, D213-1, and D213-2 of the French Consumer Code require the retention of contracts concluded electronically for more than €120 for a period of 10 years).
- We may archive your data for evidentiary purposes for the period during which our liability could be incurred, i.e. for the duration of the applicable limitation period (e.g. : Article L218-2 of the Consumer Code provides that the action of professionals, for the goods or services they provide to consumers, is subject to a two-year limitation period).

Once the retention period imposed by law has expired and any actions prescribed, your personal data will be deleted or anonymized

6.3 - Deleting your privilege card and account

You can cancel your loyalty/privilege card at any time from your personal account. However, we would like to inform you that this deletion will automatically lead to the loss of any points you may have accumulated if you joined our loyalty/privilege program.

To delete your user account on the Website, simply send your request to the following address : service-clients@nicolas.com or Établissements Nicolas, customers service , 1 Rue des Olivier 94320 Thiais.

7 - DATA RECIPIENTS

Your personal data is intended for the relevant Nicolas services.

When you order or reserve a product on the Platform, the data required to fulfill the order is communicated to the Nicolas subsidiary, the Nicolas store, and the subcontractors responsible for the order.

In addition, the data we collect may be transmitted to the service providers (subcontractors) used by Nicolas for the following services:

- IT and data hosting;
- Packaging, logistics, and delivery;
- Customer service, customer reviews, and satisfaction surveys;
- Sales prospecting campaigns via email and/or text messages;
- Distribution of targeted advertising (e.g., third-party websites, social media);
- Analysis of commercial and statistical data;
- Payment service providers and fraud detection and prevention entities.

If applicable, the transfer of your personal data outside the European Union will be carried out with appropriate safeguards in place and the security of your data will be maintained.

Nicolas may be required to transmit your personal data to judicial and police authorities, regulatory authorities, public bodies, or third-party companies in order to comply with a court order or any other legal or regulatory obligation.

8 - DATA SECURITY

Nicolas has endeavored to implement appropriate technical and organizational measures to preserve the confidentiality, integrity, and availability of the personal data processed and to prevent it from being distorted, damaged, destroyed, or accessed by unauthorized third parties.

However, Nicolas does not control all the risks associated with the operation of the Internet and draws Internet users' attention to the existence of potential risks inherent in its use and operation.

Your data is hosted in the European Union.

The security measures implemented by Nicolas may result in an interruption of access, degraded operation, and/or a modification of the Platform. In such cases, Nicolas declines all responsibility for the consequences related to an interruption, degraded operation, or modification of the Platform.

9. COOKIES AND OTHER TRACKERS

9.1 - Cookies and other trackers that may store or access data on your browser when you visit the Site

When you connect to the Site, Nicolas installs cookies on your browser. Cookies are small files stored on your device (computer, phone, etc.) and associated with the domain of our Site.

Some cookies required for the use of our e-commerce site are installed without your consent for the following purposes:

- To retain your choice regarding the use of cookies and trackers that are not exempt from consent;
- To authenticate you into your account and ensure the security of the authentication mechanism, for example by limiting automated access attempts;
- To store the contents of your shopping cart;

- To measure the Site's audience to produce anonymous statistical data (performance, detecting navigation problems, optimizing technical performance or usability, estimating the power of the required servers, analyzing content viewed, etc.)

Other cookies, pixels, and other advertising trackers are only installed after obtaining your express consent:

- Trackers using the same identifier across multiple websites or applications to enable global tracking of your browsing across different websites or applications;
- Trackers transmitting data to third parties (e.g., social networks, audience measurement and online advertising service providers);
- Trackers leading to a cross-referencing of your data with other processing operations.

These trackers may be used for audience measurement purposes (collecting data on your online activity), as well as for advertising purposes (delivering targeted or personalized advertising on other websites, applications, or social networks that match your interests).

9.2 - Configuring your cookie preferences

You can configure your browser to block all or some cookies, block only third-party cookies, allow all cookies, and delete cookies saved on your browser. This configuration is your responsibility.

You can also accept or reject all cookies, or configure your preferences, from the cookie banner that appears when you first visit the Site using a browser. Some cookies are strictly necessary for the Site to function and cannot be disabled. However, you can accept or reject performance cookies, which allow us to analyze Site traffic, and/or advertising cookies. Finally, you can change your cookie preferences at any time by consulting the "Cookie Settings" section at the bottom of the Site.

If you refuse the storage of all or some of the necessary cookies, or if you delete those stored there, you may no longer be able to access the Site or your access may be impaired. In this case, Nicolas declines all responsibility for the resulting consequences.

For more information on cookies and their use, you can consult the file of the French National Commission for Information Technology and Civil Liberties at the following address : <https://www.cnil.fr/fr/site-web-cookies-et-autres-traceurs>.

9.3 - Social media buttons and videos sharing platforms

The Site includes buttons that allow you to share one of our products on social media or video-sharing platforms, and to access the Nicolas page to follow. The processing of your data on these networks and platforms is governed by their privacy policies. We invite you to consult your cookie preferences and privacy settings on the networks and platforms with which you interact.

9.4 - Pixels and other trackers that can access data on your browser when you open an email or click on a link

Nicolas uses tracking pixels whose name contains an anonymous identifier, informing us that an anonymous person has opened an email or clicked a link to visit a page on our Site.

A tracking pixel is a transparent image embedded in an email or on a web page. When you open something containing the tracking pixel, your browser or email service sends a request to the server where the tracking pixel is stored. When the server receives this request, it records the time, date, and an anonymous identifier of the device that requested the pixel. This information is used as a confirmation that a link has been read or clicked.

10. IF YOU SHARE THE USE OF YOUR TERMINAL WITH OTHER PEOPLE

If your device is used by multiple people, and if the same device has multiple browsers installed, Nicolas cannot guarantee that the services and advertisements intended for your device correspond to your own use of this device and not to that of another user of this device.

In this case, sharing the use of your device with others is your choice and your responsibility.

11. AMENDMENT OF THE CHARTER

Nicolas may be required to modify the Charter and will ensure that you are informed of this either by a special mention on the Site or by a personalized warning, particularly in the context of sending newsletters

12. PERSONAL DATA POLICY RELATING TO MINORS

The Site is not intended for minors. Minors are prohibited from accessing the Site, as it contains content that is prohibited for minors under the age of 18. Users must provide their date of birth to access the Site.

Version in force as of 03/13/2025