

PERSONAL DATA PROTECTION POLICY OF THE LVMH SHAREHOLDERS' CLUB

Last update: September 2023

This purpose of this personal data protection policy (hereinafter the “**Policy**”) is to provide you with information, as a member of the Shareholders' Club (the “**Club**”), about the processing by **LVMH – Moët Hennessy Louis Vuitton**, headquartered at 22, avenue Montaigne, 75008 Paris, France, and is registered with the Registry of Trade and Companies (RCS) of Paris under number 775 670 417, (hereinafter “**LVMH**”, “**we**” or “**our**”) of your personal data (hereinafter “**Personal Data**” or “**Data**”), shared or collected in connection with your membership of the Club.

As a Club member, you have access to the www.clublvmh-actionnaires.fr website (the “**Website**”) published by LVMH. This Policy aims to inform you about the Data processed whenever you browse on the Website, where you can register for Club events, access a variety of publications, subscribe to newspapers and magazines of the LVMH Group, take advantage of exclusive offers for the purchase of wines and spirits from the LVMH Group on the Clos19 website and buy premium access tickets online for the Fondation Louis Vuitton.

LVMH is very attached to and takes the utmost care in ensuring the protection of the privacy and Personal Data of Club members.

Note: LVMH may be required to amend this Policy, in particular in case of new Personal Data processing is implemented. You are invited to check this page from time to time to make sure you agree to any such changes. We will inform you of such changes either through a special notice on our website, or by sending you an email notification.

1. What is “**Personal Data**”?

Personal Data means any information or set of information that can be used to identify you as a member of the Club:

- directly (example: your last name, first name, electronic address, personal address, etc.); or
- indirectly (example: using pseudonymized data such as a unique identification number, etc.).

Unique identifiers may also be considered Personal Data, for example, your computer's IP address.

2. Data Controller and Data Protection Officer

2.1. Who is the Data Controller?

The data **controller** is the entity which determines the purposes and means of the **Processing of Personal Data**, and who is responsible for compliance with applicable data protection legislation (the “**Data Controller**”).

For the **Processing** of the **Personal Data** of the members of the Shareholders' Club, the Data Controller is:

LVMH – Moët Hennessy Louis Vuitton

Registered office: 22, avenue Montaigne, 75008 Paris, France

Company registration number with the RCS of Paris: 775 670 417

2.2. Who is the LVMH Data Protection Officer?

The Data Protection Officer (hereinafter the “DPO”) is your preferred point of contact for any issues in connection with the protection of your Personal Data. The DPO can be contacted:

- by email, at the following email address: dpo.holding@lvmh.com
- by postal mail, at the following address: Data Protection Officer, 24-32, rue Jean Goujon, 75008 Paris.

2.3. Who is the Data Controller for the Clos19 website selling wines and spirits?

The Club allows its members to order certain wines and spirits from the LVMH Group at preferential prices on the www.clos19.com website. To access www.clos19.com and benefit from these preferential prices, you must first give your consent on this Website for the sharing by the Club of some of your Personal Data with Clos19.

The preferential prices applicable to some products on the Clos19 website are reserved exclusively for members of the Shareholders' Club who have set up an account on the Clos19 website.

Orders of wines and spirits placed on the Clos19 website (the “Orders”) are handled by MHCS, a *société anonyme* with share capital of €433,193,789, registered with the RCS of Reims under number 509 553 459, headquartered at 9, Avenue de Champagne, 51200 Epernay, France, VAT number: FR 44 509 553 459, phone: +33(0) 3 26 51 20 00 (hereinafter “MHCS”), as the seller of the products and will be governed by the Terms of Sale available at www.Clos19.com.

The Processing of your Personal Data in connection with Orders placed by you are governed solely by the MHCS personal data protection policy available on the Clos19 website. MHCS acts as an independent Data Controller. LVMH will not have any access to the Data in connection with your Orders. Accordingly, your rights under applicable data protection legislation must be exercised directly with the DPO of MHCS.

3. What Personal Data is Processed?

3.1. What Personal Data concerning you is processed by LVMH?

The Personal Data collected and processed by LVMH are: your last name, first name, electronic address, postal address, phone numbers, date of birth, number of shares held and evidence of ownership, the history of your orders for premium access tickets to the Fondation Louis Vuitton and your participation in Club events, your connection logs and other technical data from the device you are using and browsing history on the website of the LVMH Shareholders' Club.

3.2. How is your Personal Data collected?

We collect your Personal Data in the following ways:

- Directly from you through the membership form you complete online on the LVMH website.
- Automatically using cookies when you access the Website (connection data and information about your browsing). Please refer to our cookie management tool for more information about cookies or to change your preferences at any time.

3.3. Why and on what legal grounds is your Data processed?

Your Personal Data is collected with your voluntary consent on the basis of your membership and processed either on grounds of your consent, or of our legitimate interest.

Data is processed for the following purposes:

- Managing the mailing of documentation for Club members;
- Managing the purchase of tickets for the Fondation Louis Vuitton;
- Shareholder identification and Club member authentication management;
- Managing statistics on Club members;
- Member/MHCS/Clos19 relationship management.

3.4. Who has access to your Personal Data?

Within LVMH, your Data can be accessed by some employees of the LVMH Financial Communication Department for the purposes indicated above.

As regards third parties, your Data will not be sold or made available to any third party, excluding LVMH service providers and their subcontractors who may have access thereto for technical and logistical reasons only (routers, hosting and maintenance providers, cookie management and statistical analysis service providers).

3.5. Transfers of your Data outside the European Economic Area

Your Data will be processed in France by LVMH. However, LVMH may rely on some service providers who are located or who rely in turn on subcontractors who are located outside the European Economic Area in countries where personal data protection legislation differs from that applicable within the European Economic Area. Any possible access to your Data outside the European Economic Area by such service providers and their subcontractors is subject to appropriate safeguards in compliance with applicable data protection legislation.

3.6. How long do we keep your Data?

Information on how long LVMH keeps your Personal Data is provided in the table featured in **Appendix 1**.

In general, except in the specific cases described in **Appendix 1**, your Personal Data will be stored and processed by LVMH for the duration of your Club membership.

You can close your account at any time. Your account closure request will be processed immediately. Please note that once your account has been closed you will no longer be able to benefit from preferential rates for Orders placed on Clos19.

4. What are your rights in terms of the protection of your Personal Data?

4.1. Access, rectification and portability

Pursuant to applicable legislation, you have a right of access to, to obtain communication of, to request the correction of any of your Personal Data that may be inaccurate or incomplete, and to request the

restriction of the processing of such Personal Data. In the cases provided for by law, you have a right to portability enabling you to receive your Personal Data in an interoperable format. In order to respond to your request, we may ask you to provide proof of identity. We may also ask you to provide additional information or supporting documents. We will endeavor to respond to your request as quickly as possible.

4.2. How to exercise your right to obtain the erasure of your Data and to restrict the processing of your Data?

You can request the erasure of your Personal Data in the following cases:

- If you consider that the processing of your Personal Data is no longer necessary in relation to the purposes pursued under this Policy;
- If you consider that the processing is unlawful or dispute the accuracy of the Data processed by us concerning you;
- If you have withdrawn your consent to the processing of your Data.

You may also, within the limits provided by law, request the restriction of the processing of your Data.

Please note that notwithstanding the exercise of your right to obtain the erasure of Data or restriction of processing, we will retain some of your Personal Data where required to do so by law or in order to exercise or defend our rights.

4.3. Right to give instructions on how your Personal Data should be handled after your death

You are reminded that, in accordance with Article 63 of *loi n° 2016-1321 du 7 octobre 2016 pour "Republique numérique"*, any person may define directives relating to the retention, erasure and communication of their personal data after their death.

You may also lodge a complaint with the **French data protection authority, the Commission Nationale de l'Informatique et des Libertés (CNIL)**, 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07, phone: 01 53 73 22 22, in connection with the way in which your Personal Data is collected and processed.

5. Security and confidentiality of your Data

LVMH implements appropriate technical and organizational measures to ensure a level of Data security appropriate to the risk, and to ensure the confidentiality of your Data and prevent any alteration, damage, destruction or unauthorized access thereto by unauthorized third parties.

However, LVMH does not control all of the risks related to the operation of the Internet and draws the attention of Users of the Website to the existence of potential risks inherent to its use and operation.

6. Cookies

The Website uses cookies.

A "cookie" is a device or text file that can be saved on a dedicated space of the hard drive of your terminal (computer, tablet, smartphone, etc.) whenever you visit the Website. A cookie file allows the cookie issuer to identify and remember the terminal on which it is saved, throughout the cookie's period of validity or storage (maximum of 13 months).

When visiting the Website, depending on whether you consented to cookies upon your first visit to the Website (cookie banner) and on your cookie settings (which can be changed at any time using our cookie management tool or by changing the settings on your browser), information about your browsing on our Website may be saved in “cookie” files installed on your terminal.

The cookies used on our Website are strictly necessary for the operation of the Website. These cookies enable you to use the main functions of the site and facilitate your browsing, in particular by memorizing your identifiers.

For more information about the types of cookies this Website uses, see our “Cookie Settings” section.

NB: Cookies enhance your browsing experience on our Website and may sometimes be essential to access some parts of the Website. If you decide to disable all cookies, your browsing experience of the Website may be impaired.

7. Third-party websites

This Website may contain links to third-party websites (for instance, to the websites of subsidiaries of the LVMH Group, such as the Clos19 website) which we do not control and which are governed by their own privacy and personal data protection policies.

This Policy does not apply to such third-party websites. We invite you to consult the privacy and personal data protection policies of any such third-party websites visited by you to find out how your data will be processed. LVMH disclaims any and all liability regarding the use that may be made of your Data by such third parties.

Appendix 1

PURPOSE	CATEGORIES OF DATA	INTERNAL DATA RECIPIENTS	THIRD-PARTY DATA RECIPIENTS	PERSONAL DATA RETENTION PERIOD
Managing the mailing of documentation dedicated to Club members	Contact data	Authorized persons in the Financial Communications Department	N/A	Up to 2 years after the member ends his or her Shareholder Club membership
Managing the purchase of tickets for the Fondation Louis Vuitton	Contact data	Authorized persons in the Financial Communications Department	N/A	Data relating to your purchases of premium access tickets for the Fondation Louis Vuitton will be kept by LVMH for a period not exceeding the applicable statutory limitation periods.
Shareholder identification and Club member authentication management	Identification data Contact data	Authorized persons in the Financial Communications Department	N/A	6 months in case of unsuccessful verification of shareholder status Up to 2 years after the member ends his or her Shareholder Club membership
Managing statistics on Club members		Authorized persons in the Financial Communications Department	N/A	Connection logs collected, subject to your consent, through cookies and other tracers placed on our Website, will be stored in accordance with applicable law for a period not exceeding thirteen (13) months
MHCS/member relationship management	Contact data	Authorized persons in the Financial Communications Department	N/A	So long as the member remains a member of the Shareholders' Club