

PRIVACY NOTICE CONCERNING THE PROCESSING OF PERSONAL DATA ON WWW.ASAHIBREWERIES.EU

1. WHO WE ARE

Asahi CE & Europe Services s.r.o. (hereinafter “**Asahi**”, “**we**”, “**us**” or similar) is a private limited liability company, incorporated under the laws of the Czech Republic, whose registered office is at Ovocný trh 1096/8, Staré Město, 110 00 Praha 1, Czech Republic, ID Number: 056 29 152, registered with the Commercial Register kept by the Municipal Court in Prague, Section C, Insert 267 700, VAT number CZ05629152, subsidiary of **Asahi Breweries Europe Limited**.

We collect and process several categories of personal data from you as a user of the www.asahibreweries.eu website (hereinafter the “**website**”), which, in compliance with European Union data protection law, makes us a data controller for such data.

We take your privacy extremely seriously and this notice of personal data processing describes our policies and practices regarding our collection and use of your personal data – such as what data we collect, why we collect it, and what we do with it, and sets forth your privacy rights.

Please read this Privacy Notice carefully to understand how we handle your personal information.

2. HOW WE COLLECT YOUR PERSONAL DATA

Personal Data may be collected or accessed in a number of ways, including:

- directly from you (from your form input data on the Website);
- observed by us when you navigate on our website (cookies, IP, website navigation, etc.).

2.1 Data provided by you directly

We are required by law to ensure that website visitors of the website subpage named Brands are older than 18 years of age, therefore the first interaction you have with the Website is to provide your age or your birth date. This information is stored through a cookie which lasts for the duration of your session, unless you choose the Website to remember you for a longer duration. See section 0 below for more information on cookies.

We do not use your data to send you marketing communications unless you expressly opt in for such communication. Even in such cases we make sure that you have an easy to use option to unsubscribe (withdraw your consent) at any time, either in the communication itself or by contacting us as indicated in Section 8.

What happens if you don't give us your data

If you don't give us your age at the first visit of our Website you cannot access any of its content. This is a legal requirement.

Other than that, you can visit the Website without filling in any personal data. However, where you wish to enrol in a promotional campaign through the Website, you cannot do that without providing all required information. We have set the required fields to request the minimum amount of information we need in order to identify you and be able to contact you if needed, and we do not condition your enrolment in the campaign by your consent to receive marketing communications. Where you are a winner and we request additional information from you in order to deliver the prize or file tax statements in relation to your prize, failure to provide such information leads to your disqualification as we cannot fulfil the delivery of the prize or the tax statement, respectively.

2.2 Use of the www.asahibreweries.eu website

The Website collects certain information automatically and stores it in log files. The information may include internet protocol (IP) addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about the use of the website, including a history of the pages you view. We use this information to help us design our site to better suit our users' needs. We may also use your IP address to help diagnose problems with our server and to administer our website, analyse trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences. Our website also uses cookies and web beacons, about which you can read below.

2.2.1 Cookies, web beacons and other technologies

We use cookies and similar technologies on our Website.

Cookies are small text files placed on your computer or mobile device when you access websites. "First party" cookies are set by domains that you are visiting at the time. "Third party" cookies are set by domains other than those of the websites that you visit.

Web beacons are transparent pixel images that are used in collecting information about website usage, e-mail response and tracking.

Like cookies, the **local storage** technology allows websites to store information on a computer or mobile device. Local storage is typically persistent and, unlike cookies, data in local storage is not automatically transferred over the internet every time when the website is visited that stored the data.

The **mobile advertising ID** is a unique identifier (ID) set by the operating system of your mobile device. This ID is shared with apps that you install on your device and which may contain advertisements. Most devices allow apps to access the Mobile Advertiser ID by default. You may, however, be able to change your device settings to prevent your device from sharing this ID with apps. Check your operating systems' "Help" section to learn

more about handling Mobile Advertising IDs. On Android, Advertising means the Android Advertising ID, on iOS devices it means the ID for Advertiser (IDFA).

We refer to cookies, web beacons, local storage and the mobile advertising ID together as “cookies and similar technologies”.

Most cookies fall into one or more of the following categories:

- a) **Strictly necessary:** These types of cookies are essential to provide services specifically requested by website visitors. Without them, websites cannot function or deliver the requested services.
- b) **Performance:** These cookies collect information about how visitors use a website, such as which pages are most popular, which method of linking between pages is most effective, and if users encounter error messages from web pages. These cookies allow us to provide a high-quality user-experience, as well as measure audience of the Website pages. The information collected by these cookies does not identify users. They are designed to help improve how our website works.

This Website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help the website analyse how users use the site. The information generated by the cookie about your use of the Website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purposes of evaluating your use of the Website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

Data and information connected with IP are received only in aggregated files and anonymised. Google, Inc. is its owner and trustee. Website owner and administrators are neither trustee nor practitioner of Google Analytics data.

- c) **Functionality:** These cookies remember choices that you make so as to improve your experience.
- d) **Targeting and advertising cookies:** These cookies collect information about your browsing habits in order to make advertising relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of advertising campaigns. They may also be placed by third party social media websites to enable interaction with you (such as where we provide Facebook Like and Share buttons); they collect data on the interests of users and are

used by the third party social media service to serve targeted advertising to its users when logged into its services.

2.2.2 Your choices regarding cookies

You can adjust the privacy settings in your browser to block all cookies; however, this could severely affect your browsing experience as many websites may not function properly. Your browser may allow you to delete all cookies upon closing your browser. This option, though, results in persistent cookies getting deleted that may store your preferences and personalized settings on websites that you visit regularly. It is possible to keep desired cookies, though, as your browser may allow you to specify which websites are always or never allowed to use cookies.

More details on how to delete cookies or how to manage cookies in different internet browsers can be found by accessing the links below:

[Cookie settings in Internet Explorer](#)

[Cookie settings in Firefox](#)

[Cookie settings in Chrome](#)

[Cookie settings in Safari web and iOS.](#)

To opt out of being tracked by Google Analytics please visit [http://tools.google.com/dlpage/gaoptout.](http://tools.google.com/dlpage/gaoptout)

The IAB has provided the following website to give information specifically about privacy issues around Internet advertising: <http://www.youronlinechoices.com/>

Comprehensive information on how organizations use cookies is available at: www.allaboutcookies.org

3. HOW WE SHARE INFORMATION

We will disclose your personal data only for the purposes and to those third parties, as described below. We will take appropriate steps to ensure that your personal data are processed, secured, and transferred according to applicable law.

3.1 Disclosure to Asahi Group companies

Your personal information may be shared with any company that is a member of our group, which includes our ultimate parent company based in Japan, where we consider that it is in our legitimate interests to do so for internal administrative purposes (e.g. storage of data, CRM), or for auditing and monitoring of our internal processes.

We may also share your personal information with our group companies where they provide products and services to us, such as information technology systems.

Access to your personal information is limited to those employees who need to know the personal information, and may include your potential managers and their designees, as well as employees in the marketing, information technology and security departments.

3.2 Disclosure to third parties

We will share the strictly necessary parts of your personal data, on a need-to-know basis with the following categories of third parties:

- a) companies that provide products and services to us (processors), such as:
 - i. media agencies, such as those organising promotional campaigns and those administering the Website;
 - ii. website services: analytics, advertising (see section 0 nad);
 - iii. infrastructure agencies (other parties that handle the email newsletter, SMS marketing or other kinds of marketing, client support or sales activities in our name);
 - iv. information technology systems suppliers and support, including email archiving, telecommunication suppliers, back-up and disaster recovery and cyber security services.
- b) companies involved in the operation of our website as indicated in section 0 nad, where they are not providing a service for us.
- c) other parties such as public authorities and institutions, accountants, auditors, lawyers and other outside professional advisors, where their activity requires such knowledge or where we are required by law to make such a disclosure.

We will also disclose your personal information to third parties:

- a) If you request or authorise so;
- b) to persons demonstrating legal authority to act on your behalf;
- c) where it is in our legitimate interests to do so to run, grow and develop our business:
 - i. if we sell any business or assets related to the Website you are subscribing to, we may disclose your personal information to the prospective buyer of such business or assets, in order to ensure that the activity continues as a going concern;

- ii. if Asahi or substantially all of its assets are acquired by a third party, in which case personal information held by Asahi will automatically be one of the transferred assets;
- d) if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
- e) to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- f) to protect the rights, property or safety of Asahi, our employees, customers, suppliers or other persons.

Some of these recipients (including our affiliates) may use your data in countries which are outside of the European Economic Area. Please see Section 4 below for more detail on this aspect.

3.3 Restrictions on use of personal information by recipients

Any third parties with whom we choose to share your personal information pursuant to the above are limited (by law and by contract) in their ability to use your personal information for the specific purposes identified by us. We will always ensure that any third parties with whom we choose to share your personal information are subject to privacy and security obligations consistent with this Privacy Notice and applicable laws. However, for the avoidance of doubt this cannot be applicable where the disclosure is not our decision.

Save as expressly detailed above, we will never share, sell or rent any of your personal information to any third party without notifying you and, if applicable, obtaining your consent.

4. TRANSFERS OF INFORMATION OUTSIDE OF THE EUROPEAN UNION

The personal information may be processed by staff operating outside the EEA working for us, other members of our group or third party data processors for the purposes mentioned above.

If we provide any personal information about you to any such non-EEA members of our group or third party data processors, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this Privacy Notice. These measures include:

- in the case of US based service providers, entering into European Commission approved standard contractual arrangements with them, or ensuring they have signed

up to the EU-US Privacy Shield (see further <https://www.privacyshield.gov/welcome>);
or

- in the case of service providers based in other countries outside the EEA (including Japan), entering into European Commission approved standard contractual arrangements with them.

Further details on the steps we take to protect your personal information in these cases is available from us on request by contacting us (see section 0 pod) at any time.

5. YOUR RIGHTS

As a data subject you have specific legal rights relating to the personal data we collect from you. Asahi will respect your individual rights and will deal with your concerns adequately.

- a) Right to withdraw consent:** Where you have given consent for the processing of your personal data, you may withdraw your consent at any moment.
- b) Right to rectification:** You may obtain from us rectification of personal data concerning you. We make reasonable efforts to keep personal data in our possession or control which are used on an ongoing basis, accurate, complete, current and relevant, based on the most recent information available to us. In appropriate cases, we provide self-service internet portals where users have the possibility to review and rectify their personal data.
- c) Right to restriction:** You may obtain from us restriction of processing of your personal data, if
 - you contest the accuracy of your personal data, for the period we need to verify the accuracy,
 - the processing is unlawful and you request the restriction of processing rather than erasure of your personal data,
 - we do no longer need your personal data but you require them for the establishment, exercise or defense of legal claims, or
 - you object to the processing while we verify whether our legitimate grounds override yours.
- d) Right to access:** You may ask from us information regarding personal data that we hold about you, including information as to which categories of personal data we have in our possession or control, what they are being used for, where we collected them, if not from you directly, and to whom they have been disclosed, if applicable.

We will provide you with a copy of your personal data upon request. If you request further copies of your personal data, then we can charge you with a reasonable fee that we base on the administrative costs.

You have the right to the information about our safeguards for the transfer of your personal data to a country that is outside the EU and the EEA if you request that we confirm whether or not we process your personal data, and we transfer your personal data to a country that is outside the EU and the EEA.

- e) **Right to portability:** As of 25 May 2018 you have the right to receive your personal data that you have provided to us, and, where technically feasible, request that we transmit your personal data (that you have provided to us) to another organization.

These two rights are rights you have if:

- we process your personal data by automated means,
- we base the processing of your personal data on your consent, or our processing of your personal data are necessary for the execution or performance of a contract to which you are a party;
- your personal data are provided to us by you, and
- the transmission of your personal data does not adversely affect the rights and the freedoms of other persons.

You have the right to receive your personal data in a structured, commonly used and machine-readable format.

Your right to receive your personal data must not adversely affect the rights and the freedoms of other persons. This may be the case if a transmission of your personal data to another organization also involves the transmission of the personal data of other (non-consenting) individuals.

Your right to have your personal data transmitted from us to another organization is a right you have if such transmission is technically feasible.

- f) **Right to erasure:** You have the right to request that we delete the personal data we process about you. We must comply with this request if we process your personal data, unless the data is necessary:
- for exercising the right of freedom of expression and information;
 - for compliance with a legal obligation that binds us;
 - for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; or
 - for the establishment, exercise or defence of legal claims.
- g) **Right to object:** You may object – at any time – to the processing of your personal data due to your particular situation, provided that the processing is not based on your consent but on our legitimate interests or those of a third party. In this event we shall no longer process your personal data, unless we can demonstrate compelling legitimate grounds and an overriding interest for the processing or for the establishment, exercise or defense of legal claims. If you object to the processing, please specify whether you also wish the erasure of your personal data, otherwise we will only restrict it.

You may always object to the processing of your personal data for direct marketing that was based on our legitimate interest, regardless of any reason. If the marketing was based on your consent, you can withdraw consent.

- h) **Right to lodge a complaint:** You can lodge a complaint to the data protection supervisory authority:

Name: **Office for Personal Data Protection**
Address: Pplk. Sochora 27, 170 00 Praha 7, Czech Republic
Telephone: +420 234 665 111
Fax: +420 234 665 444
Email: posta@uoou.cz

Please note:

- **Time period:** We will try to fulfill your request within 15 days. As of 25 May 2018 the period is 30 days and it may be extended due to specific reasons relating to the specific legal right or the complexity of your request. In all cases, if this period is extended, we will inform you about the term of extension and the reasons that led to it.
- **Restriction of access:** In certain situations we may not be able to give you access to all or some of your personal data due to statutory provisions. If we deny your request for access, we will advise you of the reason for the refusal.
- **No identification:** In some cases, we may not be able to look up your personal data due to the identifiers you provide in your request. In such cases, where we cannot identify you as a data subject, we are not able to comply with your request to execute your legal rights as described in this section, unless you provide additional information enabling your identification. We will inform you and give you the opportunity to provide such additional details.
- **Exercise your legal rights:** In order to exercise your legal rights, please contact us in writing (including electronically) at the contact details provided in section 8 pod.

6. SECURITY

Asahi is committed to protecting personal information from loss, misuse, disclosure, alteration, unavailability, unauthorised access and destruction and takes all reasonable precautions to safeguard the confidentiality of personal information, including through use of appropriate organisational and technical measures. Organisational measures include physical access controls to our premises, staff training and locking physical files in filing cabinets. Technical measures include use of encryption, passwords for access to our systems and use of anti-virus software.

In the course of provision of your personal data to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, the transmission of information between you and us over the internet is not completely secure. As such, we cannot guarantee the security of your personal information transmitted to us over the internet and that any such

transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access to it.

7. CHANGES TO OUR PRIVACY NOTICE

We reserve the right, at our discretion, to modify our privacy practices and update and make changes to this privacy notice at any time. For this reason, we encourage you to refer to this privacy notice on an ongoing basis. This privacy notice is current as of the date which appears at the top of the document. We will treat your personal data in a manner consistent with the privacy notice under which they were collected, unless we have your consent to treat them differently.

8. CONTACT INFORMATION

Please direct your questions regarding the subject matter of data protection and any requests in the exercise of your legal rights to the following contact details:

e-mail: personaldataprotection@eu.asahibeer.com,

POSTAL ADDRESS: **Asahi CE & Europe Services s.r.o.**, Legal department, Ovocný trh 1096/8, Staré Město, 110 00 Praha 1, Czech Republic.

We will investigate and attempt to resolve any request or complaint regarding the use or disclosure of your personal information.

If you are not satisfied with our reply, you may also make a complaint to the National Supervisory Authority for Processing of Personal Data. You can find further information about the process at <https://www.uoou.cz/en/>.