Privacy Policy

If you would like further information about your data protection rights or would like to exercise any of them, please contact us at any time by email at personaldataprotection@eu.asahibeer.com. Please use the initial request form.

This document is a policy - a guideline on the protection of the privacy of natural persons, it sets out the rules for Plzeňský Prazdroj, a. s., Reg. No. 45357366, with registered office at U Prazdroj 64/7, Východní Předměstí, 301 00 Plzeň (hereinafter referred to as the "Company", "Asahi", "our", "us" or "we"), a member of the Asahi group of companies, whose ultimate owner is Asahi Group Holdings, Ltd., with headquarters at 23-1 Azumabashi, 1-chome, Sumida-ku, Tokyo, 130-8602, Japan.

This document is available on the website operated by the Company.

We value the privacy of individuals who provide us with personal information. This policy applies to our customers, employees who work for our customers, site visitors, distributors, our suppliers (and potential suppliers), employees of those suppliers, and contractors. It describes: the data that identifies you and that we collect; how we use that data; the legal basis on which we process it; who we share it with; and how we store it.

This document also describes other important topics related to your data and its confidentiality. Please read this policy carefully so that you know how we treat your personal data.

By visiting or browsing our website, contacting us via social media or working for us, offering us goods or services, using any of the products or services we provide to you, or otherwise providing us with your information (including by entering contests or visiting our events or breweries), you acknowledge that you have read the full text of this Privacy Policy. This policy consists of the following sections:

- Part 1: Data Collection
- Part 2: Use of Data
- Part 3: The legal basis for the use of your personal data
- Part 4: Cookies
- Part 5: Communication of personal data
- Part 6: Retention of personal data
- Part 7: Your rights
- Part 8: Marketing
- Part 9: Data transfer
- Part 10: Security
- Part 11: Third Party Sites
- Part 12: Changes to the Privacy Directive
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1. Data collection

We may collect some information about you directly from you. However, we may obtain some information about you from third parties, such as your employer or employment agency, retailers of which you are a customer, media agencies, market research companies, our suppliers, group companies, public websites, agencies (including booking agencies) and public authorities (including customs authorities), which are collectively referred to in this Directive as "external sources".

We, or third parties on our behalf, may collect and use the following information about you, which is referred to as "personal data" in the remainder of this policy:

1.1 Personal Data that you give us (or that we receive from external sources).

You or your employer or employment agency may provide us with personal information about yourself by using online forms on our website, by completing order forms, by creating an account with our company, or by contacting us by telephone, email or other means. This includes, for example, when your employer provides us with your personal information in order to use our services. You or outside sources may also give us personal information about you when you or an outside source offers or provides services to us.

The personal information you give us (or that we receive from external sources) may include:

(a) Personal Information about you: your first name; last name; your job title; your company name; your email address; your telephone number; your account information; your company address; your gender; your date of birth; information provided in correspondence; updates to information provided to us; and, if you visit our facilities, industry camera records.

(b) Data about visitors to our websites and, where applicable, users of our apps: if you visit our website, your IP address; your username; your age; your behaviour on the website (for example, pages you have clicked on) or on our apps; payment details; order history and, if you are a mobile app user, your location data so that we can help you find our products and services and, if you are a service provider, so that we can monitor the efficiency and cost-effectiveness of the services you provide to us.

(c) Data about the goods or services we provide to you: data needed to provide goods or services to you (including data from account opening forms, order details, order history, payment details, delivery addresses, delivery requirements and restrictions, trade references and tax information); the name you provide for personalised products; data for customer service, and data for customer relationship management and marketing.

(d) Service Data that we obtain from you or your employer (including breweries, bars, wholesalers, restaurants, media contacts, carriers, warehouses, fulfillment centers, support equipment providers and technicians, brand ambassadors, and other contractors): your website; your photographs and video footage if you are a brand collaborator or ambassador, or a potential collaborator or brand ambassador CVs, tenders and tender data, white paper data; due diligence data (e.g. for alcohol wholesalers); work contact information (phone number, mailing address, email address); proof of identity and address; visa or work permit documents; emergency contact information; workplace accident information or health and medical records (relevant to your employment and/or provided by you to Asahi, e.g. medical assessments); working hours (overtime and shifts, hours worked and standard departmental working hours); details of pay, reimbursements and bank accounts; drug and alcohol testing and medical

examination details; information from legal proceedings and investigations, and details required to access the system and applications (e.g. system ID).

(e) If you use a photo booth at one of our breweries or at an event, your photo and time stamped photo.

(f) If you use social media to connect with us or find out about our products or services, your profile information (including your preferences and communications with us on Facebook, Instagram and Twitter) and information you post on message boards related to our business.

(g) If you attend our events, photographs and video footage of the event (we will also inform you of this during the event).

Some of the personal data we collect about you or that you or third parties provide to us (including details of your employer or employment agency) may be considered special categories of data. Special categories of data include data about your physical and mental health.

Please note that we need to collect certain types of personal data in order to provide services to you or for you or external sources to provide services to us. If you do not provide us with this personal information, or if you ask us to remove it, you may no longer be able to access or provide goods and services to us.

1.2 Personal information we collect about you or that we obtain from our external sources

(a) We may automatically collect any of the following whenever you visit our website: technical Data, including the IP address used to connect your computer to the internet, the domain name and country that sent the data request, the files requested, browser type and version, browser add-on types and versions, operating system and platform; information about your visit, including URLs of pages that lead to, through or from our site (including date and time), the time and duration of visits to certain pages, site interaction data (such as browsing, clicks and mouse pointer placement), methods of leaving the site, traffic data, location data, blogging and other communication data, and data provided when requesting additional services or downloads.

(b) If you contact us on social media, we will collect certain information about you from social media sites and through your interaction with us or information about our products and services.

(c) If you are a journalist or work for an institution/association in our industry, we may collect data about you from public sources.

(d) If you are a customer or supplier (or potential customer or supplier), or work for one (including in a consultancy role), we may collect data about you from your company's website.

(e) If you work for us or are a visitor to one of our sites (for example, a brewery), we may also obtain data about you from industrial cameras.

2. Use of data

We, or external sources acting on our behalf, collect, use and store the personal data listed above for the following reasons:

2.1 If you visit our website, or if you are a consumer and use one of our apps

(a) to enable you to access and use our website or app (including checking whether you are of legal drinking age);

(b) to provide technical support;

(c) to provide you with the information and services you request from us;

(d) to ensure the security of our services, our website and our app;

(e) to store information about your preferences and to tailor our website and app to your individual interests;

(f) to recognise you when you return to our website;

(g) if you are an app user, to recognize your location so that we can turn on notifications in the app about bars in your area, to monitor app usage and beer consumption, to conduct market research, and to learn about your preferences and experiences at places where our products are sold (e.g., hotels, bars, or restaurants);

(h) to enable you to participate in our competitions and promotions;

(i) to process your orders for our goods or services; and

(j) to improve and maintain our website and app and to prepare reports or compile statistics to improve our goods and services. This information will be anonymized to the extent reasonably possible and your person will not be identifiable from the data collected.

2.2 If we obtain goods or services from you

(a) to receive services from you and administer them (including conducting supplier due diligence, payment and expense reports and financial audits);

(b) to manage and maintain health and safety records;

(c) to assess your fitness for work (for example, to assess whether you are under the influence of drugs or alcohol and therefore pose a danger to yourself and others);

(d) to check information on your CV and references to assess whether you or your employer are suitable candidates for employment with us; and

(e) to monitor equal opportunities.

2.3 If we provide goods or services to you

(a) to provide you or your employer with relevant goods or services (including to enable us to confirm and process orders, to administer your account with us, customer loans, taxes and expenses, for billing and debt collection purposes and bottle collection (if this is the case for you));

(b) to deal with any queries or problems you have with our goods or our services, including any questions you may have about how we collect, store and use your personal information or requests to provide you with copies of the information we hold about you. If we do not have a contract with you, we may process your personal data for those purposes that are in our legitimate interest in the context of providing customer service;

(c) to send you certain communications (including emails or postal mail) about our goods and services, such as notices and administrative messages (for example, to tell you about changes to our terms and conditions and to inform you about our fees and charges);

(d) to enable you to participate in our events or competitions and to send you photographs of yourself that we take with your permission;

(e) to ensure health and safety and quality control;

(f) to carry out statistical analysis and market research; and

(g) where you have given your consent, or otherwise where it is in our legitimate interests, for business development and marketing purposes, to provide you with information (including by email and postal mail) about our products and services that you have requested or that we think may be of interest to you (including newsletters), but only if you have given your consent.

2.4 For internal corporate reporting purposes, business administration, to ensure adequate insurance coverage for our business, to ensure the security of our facilities, for research and development purposes, and to identify and implement opportunities to improve business efficiency.

2.5 To comply with all procedures, laws and regulations that apply to us - which may include where, in our discretion, compliance is in our legitimate interests or the legitimate interests of others, and where required by law.

2.6 To establish, exercise or defend our legal rights - which may include where, in our discretion, it is in our legitimate interests or the legitimate interests of others to do so, and where required by law.

2.7 If you visit any of our sites (including the brewery) for the purpose of monitoring by industrial cameras and to ensure the safety of our staff and visitors and our and their property.

2.8 If you contact us on social media to monitor your interaction with us and our brand online, and where it is in our legitimate interests to do so, also for market research purposes and to plan future marketing campaigns.

2.9 If we use a photograph or video of you at an event to disseminate information about the event to a wider audience and for internal presentation purposes, and where it is also in our legitimate interests to do so for business development and marketing purposes, or where we have your consent to do so.

2.10 If you are a user of our maintenance tracking application, the CM/SpinApp, to identify your location when you provide maintenance services to our tap facilities and where it is also in our legitimate interest to manage our customers' service requests.

2.11 If you are a journalist, and where it is in our legitimate interest to do so, to contact you to ask you to write a news article about our products and services, to invite you to events, to send you promotional material and to forward press releases.

3. Legal basis for using your personal data

3.1 In our opinion, the legal basis for the use of your personal information described in this Privacy Policy is as follows:

(a) our use of your personal data is necessary for us to perform our obligations under any contract with you (for example, to fulfil an order you have placed with us, to comply with the terms of use of our website or app that you have accepted by visiting our website or downloading our app,

and/or to comply with our service agreement, or to obtain services from you or your employer); or

(b) our use of your personal data is necessary to comply with our legal obligations, (e.g., to provide data to a tax authority); or

(c) where neither option (a) nor (b) applies, the use of your personal data is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our website or mobile app). Our legitimate interests are: to operate, expand and develop our business; to operate our website and our mobile application; to select qualified suppliers with the necessary skills; to provide a safe working environment for our staff and visitors; marketing, market research and business development; to provide goods and services to our customers, to make and receive payments, to provide customer service and to know the customers we serve; to place orders, monitor and ensure their fulfilment by our suppliers; and for internal group administration purposes as described in section 5.1 below.

3.2 We may use special categories of your personal data where you have given us your consent to do so (which you may withdraw at any time once given, as set out below).

3.3 In the future, other uses of your personal data may be subject to your consent (which you may withdraw at any time once given, as set out below). If this is the case, the need for consent will be set out in this privacy policy.

3.4 If we are relying on the consent you have given us to use your data in a particular way, but you later change your mind, you can withdraw your consent - contact us at the dedicated privacy contact: personaldataprotection@eu.asahibeer.com and we will abandon this use. However, if you withdraw your consent, this may affect our ability to provide services to you (for example, terminating your participation in a promotion).

4. Cookies

4.1 Some pages on our website and mobile apps use cookies, which are small files that are placed in your browser when you visit our website or use our app. We use cookies so that we can offer you better personalized options in the future by recognizing and remembering your specific browsing preferences.

4.2 If we use cookies on our website, you can block them at any time. To do this, you can activate a browser setting that allows you to refuse the setting of all or some cookies. However, if you use a browser setting that blocks all cookies (including essential cookies), you may not be able to access all or parts of our site or be able to use all or some of the features provided through the site.

4.3 Details of the cookies we use and the purposes for which we use them are set out in our Cookie Policy here: www.asahibeer.eu/cookie-policy/. If you continue to use our website, mobile applications and/or services, you consent to our use of cookies as described in our Cookie Policy.

5. Disclosure of Personal Information

5.1 We may share your personal information with any company that is a member of our group, which includes our ultimate parent company based in Japan, where it is in our legitimate interest to do so for internal administrative purposes (such as ensuring consistent and coherent service delivery to our customers, for corporate strategy, in compliance, for auditing and monitoring, for research and development and for quality assurance). We may also share your personal data with our group where its companies provide us with products and services, such as information technology systems.

5.2 We will share your personal data with the following categories of third parties:

(a) with our service providers and subcontractors, including but not limited to payment processors, technical service and support providers, insurers, logistics service providers and cloud service providers;

(b) with your employer or employment agency;

(c) retailers of which you are a customer;

(d) with public bodies (including customs officials);

(e) with contracted in-plant doctors and health professionals performing drug and alcohol testing (if used);

(f) with companies that assist us with marketing, advertising and promotion; and

(g) analytics and search engine providers that help us improve and optimize our website and our applications.

The ability of any third parties with whom we share your personal information to use that information for purposes other than to provide services to our company is limited (by law or contract). We will always ensure that third parties with whom we share your personal information comply with privacy and security obligations that are consistent with this Privacy Policy and applicable laws.

5.3 We will also disclose your personal data to third parties:

(a) where it is in our legitimate interest to do so in the operation, growth and development of our business: if we sell or buy any businesses or assets, we may disclose your personal information to the prospective buyer or seller of that business or asset; if substantially all of the assets of Asahi or any of its subsidiaries are acquired by a third party, in which case the personal information held by Asahi will be part of the assets transferred;

(b) if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, lawful requests by government officials or law enforcement agencies, and in order to comply with national security or law enforcement laws or to prevent illegal activity;

(c) to enforce or give effect to our terms and conditions or other agreement, or to respond to claims, protect our rights or the rights of a third party, protect the safety of persons, or prevent illegal activities; or

(d) to protect the rights, property or safety of the Company, our employees, customers or others. This may include exchanging personal information with other organizations for the purposes of fraud protection and credit risk mitigation.

5.4 We may also disclose and use anonymised, aggregated reports and statistics about users of our website and apps or our goods and services and from interactions with us and our brands on social media for the purposes of producing internal reports or messages for our Group or other third parties and for our marketing and promotional purposes. None of these anonymized, aggregated reports or statistics will allow for the personal identification of our users.

5.5 Unless expressly stated above, we will never share, sell or rent your personal information to any third party without notifying you and obtaining your consent as necessary. If you have given us consent to use your personal information in a particular way but later change your mind, you should contact us and we will discontinue that use.

6. Retention of personal data

We do not keep your personal data for longer than is necessary for the purposes for which the personal data is processed. The length of time we retain personal data depends on the purpose for which we collect and use it and/or is driven by compliance with applicable laws and the need to establish, exercise or defend our legal rights.

7. Your rights

7.1 You have certain rights in relation to your personal data. If you would like further information about these rights, or wish to exercise any of them, please contact us at any time by email at personaldataprotection@eu.asahibeer.com (initial request form). You have the right to request that we:

(a) provide access to the personal information we hold about you;

(b) update any of your personal information that is not current or correct;

(c) remove any personal data we hold about you;

(d) restrict how we process your personal data;

(e) prevent the processing of your personal data for direct marketing purposes;

(f) provide or not provide your personal data to external service providers;

(g) provide you with a copy of the personal data we hold about you; or

(h) consider reasonable objections you raise to our use of your personal data.

7.2 We will consider all such requests and respond to them within a reasonable time (in any event, no later than the time prescribed by law). However, please note that certain personal data may be excluded from such requests in certain circumstances.

7.3 If such an exception occurs, we will notify you in response to your request. Before we respond to your request, we may require you to provide us with information necessary to confirm your identity.

8. Marketing

8.1 We may collect and use your personal information for marketing purposes in emails, apps, phone calls and mailings.

8.2 We may send you certain marketing communications (including electronic marketing communications to existing customers) where it is in our legitimate interests to do so for marketing and business development purposes.

8.3 However, we will always obtain your consent for direct marketing communications where this is required of us by law

required and where we intend to disclose your personal data to a third party for these marketing purposes.

8.4 If you would like us to stop sending you marketing communications, you can contact us at any time by email at personaldataprotection@eu.asahibeer.com.

9. Transfer of personal data

9.1 Personal data may be used, stored and/or accessed by non-EEA employees who work for us, other members of our group not external sources. They may do so for the purposes set out in section 1.2(e) above, in the course of providing our services to you or your employer, for the purposes of obtaining services from you or external sources, to process transactions and/or provide support services. Further details of who your personal data may be disclosed to are set out in section 5 above.

9.2 Where we transfer any personal data about you to such a member of our group outside the EEA or to external sources, we will take appropriate measures to ensure that the recipient adequately protects your personal data in accordance with this Privacy Directive. These measures may include, but are not limited to:

(a) for US-based entities, entering into standard contractual commitments approved by the European Commission or ensuring that they join an EU-US Privacy Shield arrangement (see further information at https://www.privacyshield.gov/welcome); or

(b) in the case of entities located in other countries outside the EEA (including Japan), entering into standard contractual commitments approved by the European Commission.

9.3 Further details of the measures we take to protect your personal data in these cases are available on request - please contact us by email at personaldataprotection@eu.asahibeer.com at any time.

10. Security

10.1 The Company takes great care to protect personal data from loss, misuse, disclosure, alteration, unauthorised access, unavailability and destruction and takes all reasonable precautions to protect the confidentiality of personal data, including appropriate organisational and technical measures. Organizational measures include control mechanisms to restrict physical access to our premises, employee training, and locking physical files in filing cabinets. Technical measures include the use of encryption, passwords to access our systems and the use of anti-virus software.

10.2 When you provide personal information, your personal information may be transmitted over the Internet. Although we make every effort to protect the personal information you provide to us, the transmission of information over the Internet is not completely secure. Therefore, you acknowledge and accept that we cannot guarantee the security of your personal information that is transmitted to our website and that such transmission is at your own risk. Once we receive your personal information, we will use strict procedures and security features to prevent unauthorized access to that information.

10.3 If we have given you (or if you have chosen) a password that allows you to access your online account, you are responsible for keeping that password confidential. We ask that you do not disclose the password to anyone.

11. Third Party Sites

Our website, mobile apps and social media pages may occasionally contain links to sites operated by third parties, including our partner networks and group companies. Please note that this privacy policy only applies to personal information that we collect through our website, apps and social media pages, or that we obtain from external sources, and that we cannot be held responsible for personal information about you that is collected and held by third parties. Third party sites have their own privacy policies and guidelines and you should read them carefully before submitting any personal information to these sites. We do not endorse or otherwise accept any responsibility for the content of these third party sites or the terms and guidelines of these third parties.

12. Changes to our Privacy Policy

We may update our privacy policy from time to time. Any future changes to our privacy policy will be posted on this page and you will be notified by email as necessary. Please return to this page periodically to check for updates or changes to our privacy policy. If you continue to use the Services and our Site, or offer and/or provide services to us, you acknowledge that you have read and understand the current version of our Privacy Policy.

13. Further questions or complaints

13.1 If you have any questions or complaints about our collection, use or retention of your personal information, or if you wish to exercise any of your rights related to your personal information, please contact us at personaldataprotection@eu.asahibeer.com. We will investigate and attempt to resolve any complaint or dispute regarding the use or disclosure of your personal information.

13.2 You may also lodge a complaint with the local data protection authority in the European Union country in which our company is based or in which we process personal data relating to the offering of goods or services to you in the European Union. If you are unsure which data protection authority to contact, please contact the Legal Department at legalservices@asahibeer.cz for assistance. Alternatively, if you believe that your rights have been violated, you can seek redress from local courts.

The procedures described in this privacy policy represent the current privacy policy as of May 25, 2018.

In Pilsen, 13 April 2018