

## **Brief information on the processing of personal data of natural persons within our company in supplier-customer relationships**

We would like to briefly inform you about the processing of your personal data. The following information does not concern the personal data of legal persons, including their names, legal form and contact details.

### **1. Who is the controller of your personal data?**

The controller of your personal data is the company **Asahi Brands Austria GmbH**, a legal entity established under the laws of Austria, having its registered office at Hermann-Mark-Gasse 10, 1100 Wien, Identification Number: FN 532792v.

### **2. In what situations will we process your personal data?**

#### **A. When do we process data with your consent?**

We will ask you to grant your consent if you are not one of our customers and do not have any other similar relationship with us corresponding to the requirements of recital 47 of the General Data Protection Regulation, and you wish to receive marketing offers from us.

#### **B. When do we process data without your consent?**

We can process your personal data without your consent on the basis of the following legal reasons and the following purposes:

- a) Legal reason: The performance of a contract or the execution of measures adopted prior to entry into a contract carried out at your request.

Purpose:

- Implementation of a contractual commitment, including related commercial and financial communications
- A loyalty programme

- b) Legal reason: Protection of rights and legally protected interests of the Controller.

Purpose:

- For recovering amounts due for delivered goods or other receivables of the Controller
- In selected cases, for assessing your creditworthiness and reliability
- A camera system with a recording to protect the Controller's assets
- Identification of visitors to the Controller's premises in order to protect the Controller's assets.
- Direct marketing aimed exclusively at our customers and persons meeting the requirements of recital 47 of the GDPR consisting in an offer of products and services provided by the Controller.

- c) Legal reason: Fulfilment of obligations arising by law.

Purpose:

- To provide state authorities with cooperation ensuing from and within the limits of the law, including the retention of data pursuant to the law
- Bookkeeping.

### **3. Which of your personal data do we process?**

We process the following personal data:

- Your identification and contact details
- Data on products which you have purchased or on services which you provide us with
- Data from our mutual communications (whether they take place in person, in writing, by phone or otherwise)
- Payment data (e.g. data on paid or outstanding amounts, your account number, etc.)
- Data on your creditworthiness and reliability (in selected cases only)

### **4. What sources does this information come from?**

Your personal data processed by the Controller for the purposes described in 2 above comes from the following sources:

- a) Data which you have provided us with, e.g. in connection with entry into a contract, or which you have communicated to us in the course of our cooperation
- b) We also process data obtained from public sources, lists and records such as the Commercial Register, the Trade Register, the Insolvency Register, or the Property Register

### **5. Who is the recipient of your personal data?**

In justified cases and to the necessary extent only, we pass on your personal data to the following categories of recipients:

- Other ASAHI Group companies
- Our contractual partners who we require for our routine operations and the implementation of contractual relationships with you, e.g. IT suppliers and courier or postal service suppliers
- Other entities in cases where we are required to provide your data by law, or where it is necessary in order to protect our legitimate interests (e.g. the courts, the Police of the Czech Republic, etc.).

### **6. What are your rights during the processing of your personal data?**

Where your personal data is concerned, you have the following rights:

- Right of access – you can ask the Controller to allow you to access the personal data which we are processing. The Controller will also provide you with a copy of the processed personal data
- Right to rectification – you can ask the Controller to allow you to make rectifications to inaccurate or incomplete personal data which we are processing
- Right to erasure – you can ask the Controller to erase your personal data if any of the following situations arise:
  - a. Your personal data is no longer required for the purposes for which it has been collected or otherwise processed

- b. You withdraw your consent based on which your personal data has been processed and there is no legal reason for processing it
  - c. You raise an objection to being the subject of decision-making based on the automatic processing of your personal data and there are no prevailing legitimate reasons for such processing, or you raise an objection to the processing of your personal data for direct marketing purposes
  - d. Your personal data has been processed illegally
  - e. Your personal data has to be erased to comply with a legal obligation established by the law of the Union or a member state which applies to the Controller
  - f. Your personal data has been collected in connection with an offer of services from an information society
- Right to restrict processing – you can ask the Controller to restrict the processing of your personal data if any of the following situations arise:
    - a. You deny the accuracy of your personal data for the time it takes for the Controller to verify the accuracy of the personal data
    - b. The processing of your personal data is illegal, but you refuse to have it erased and request that its use be restricted instead
    - c. The Controller no longer requires your personal data for the purposes of processing, but you require it for determining, exercising or defending legal claims
    - d. You raise an objection to the processing of your personal data under Art. 21 (1) of the Directive, until it has been determined whether the Controller's legitimate reasons outweigh your legitimate reasons
  - Right to data portability – in cases anticipated by the GDPR, you have the right to receive personal data which concerns you, and which you have supplied to the Controller, in a structured, commonly used and machine-readable format. This right, however, must not unfavourably affect the rights and liberties of other persons
  - Right to withdraw consent – if personal data is processed on the basis of your consent, you have the right to withdraw your consent to the processing of your personal data for the purpose for which you granted it at any time
  - Right to object – you can raise an objection with the Controller to the processing of your personal data for direct marketing purposes carried out on the basis of a legitimate interest of the Controller at any time
  - Right to lodge a complaint – you have the right to lodge a complaint with the supervisory body, specifically by the Österreichische Datenschutzbehörde, mit der Anschrift Barichgasse 40-42, 1030 Wien, E-Mail-Adresse: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at), <https://www.dsb.gv.at>.

## **7. Is your consent to personal data processing voluntary or compulsory?**

We will ask you to grant your consent if you are not one of our customers and do not have any other similar relationship with us corresponding to the requirements of recital 47 of the General Data Protection Regulation, and you wish to receive marketing offers from us. Granting consent is entirely voluntary. Granting consent is not a prerequisite for obtaining any product or services from our company or any ASAHI Group company.

**8. Can granted consent to personal data processing be withdrawn?**

You can withdraw consent granted for marketing purposes at any time.

**9. How can you withdraw consent to personal data processing?**

You can withdraw your consent to the processing of your personal data by writing to our company.

**10. How can you defend yourself against direct marketing carried out without your consent?**

You are entitled to raise an objection against any such processing of your personal data free of charge at any time.

**11. Further information on the Privacy Policy**

You can find more detailed information on the processing of your personal data in our Privacy Policy, available at [https://www.asahiaustria.at/files/images/downloads/DokumenteAT/DV004\\_ABA\\_Privacy\\_policy\\_\(external\)\\_EN.pdf](https://www.asahiaustria.at/files/images/downloads/DokumenteAT/DV004_ABA_Privacy_policy_(external)_EN.pdf).