

# Privacy Policy

## 1. General

This Privacy Policy applies to our website and mobile app dedicated to **Heineken Česká republika, a.s** for customers in the Czech Republic and available at [www.krusovice.cz](http://www.krusovice.cz) (the "**Website**") where we, **Heineken Česká republika, a.s**, collect certain personal information. Please read this Privacy Policy carefully as it contains important information to help you understand our practices regarding any personal information that you give to us or that we collect otherwise in the context of the Website ('Personal Data'). **Heineken Česká republika, a.s** ('we' or 'us') is the controller of the Personal Data collected and processed.

We respect your privacy, and we are committed to keeping your Personal Data secure and managing it in accordance with our legal responsibilities under applicable data protection laws.

## 2. What Personal Data We Collect and How We Use your Personal Data

You can use the majority of our Website without being required to provide any Personal Data to us. For certain services and purposes of the Website, you need to provide Personal Data to us for us to be able to process your orders or to send newsletters or other information to you. In addition to the information you are required to provide to us, we collect certain information when you visit our Website. Requested information on the Website marked with an asterisk is mandatory. If you do not provide the requested information, we will not be able to deliver the service or product to you.

We have specified the Personal Data we collect, the purposes for which we use the Personal Data and how long we will generally retain your Personal Data:

- 1) **customer services**: For answering your questions if you have submitted a question via the Website, for product recalls or other service mails, including your application for brewery tour, we process your e-mail address or phone number (depending on how you have contacted us) and the question or issue you have raised with us. We register your requests, questions and our responses and other actions to handle your request.

All information will retain for 1 year after your question or complaint has been solved or the inquiry was closed, if necessary to file claims in court in order to protect our rights and obligations, this period could be longer;

- 2) **sending newsletters [and /or other marketing information]**: if you have subscribed for the newsletter, we use the email address you have provided to send you our newsletter. If you have ordered one of our products via our Website, we may also send you newsletters to inform you of our other similar products that we think may be of interest to you. If you no longer wish to receive any e-mails from us, you can unsubscribe at any time by using the unsubscribe function in each e-mail message or you can Contact Us.

The use of your Personal Data is to process your subscription, so to perform our agreement with you, or as it is in our legitimate interests to send our customers information about our products. We will remove your email address once you have opted-out of receiving the newsletter, unless this is also used and retained for other purposes listed in this Privacy Policy;

- 3) **marketing**; information about your purchases, your online searches (clicks and views), your settings on our Website, your customer service requests and contact history can be combined by us. This information enables us to use different channels for relationship

management and marketing of our products and services to you via e-mail (newsletters) or online advertising which may include personalising Website content and offers so these are tailored to your preferences. We may send you information about products and services of other HEINEKEN group companies if you have provided us with permission to do so. We measure the effectiveness of our campaigns.

You can always opt-out of receiving our newsletter or direct mail and you can always object to our use of your Personal Data for direct marketing purposes (for more information on how to do this, read the paragraphs below on your rights).

We use this Personal Data as it is necessary in our legitimate interests to be able to promote our products and services to our customers and website visitors, to enable us to attract more customers, to improve the sale of our products and services and to finance our Website (via online advertisements). We will retain the Personal Data as specified under the relevant purposes for which the Personal Data have been collected (e.g. newsletters). The Personal Data shall generally be deleted or anonymised after completing the purpose, except where we are legally required to retain the Personal Data or where it is kept for any of the other purposes.

(F.e., if you have given your consent to receive a newsletter, we process personal data for this purpose until it is revoked);

- 4) **information about your visit to and use of our Website;** we collect certain information when you visit our Website, such as your [IP address, which web pages you visit, clicks and views]. We also keep track of how you use our newsletter, which pages you view and which parts you read so we can customize the newsletter to your preferences. The information about your use of our Website and services enables us to build segments, which are groups of website visitors or customers with a number of common characteristics such as age group, gender or region. We will likely add you to one of our segments. Segments are used by us to customize the Website and to e.g. change the order of search results or where we place certain offers so you are more likely to see these. We may also use segments to show online advertisements that we think are relevant for you.

We use this Personal Data as it is necessary in our legitimate interests to do so to be able to promote our products and services to our customers and website visitors, to enable us to attract more customers, to improve the sale of our products and services and to finance our Website (via online advertisements);

- 5) **maintenance and optimisation of our Website;** Your Personal Data will also be used for maintenance and analysis of our Website to solve performance issues, to improve the availability and to secure the website against fraud (e.g. in case of repeated attempts to log-in or to make a purchase or if the purchase is made where there is non-compliance with our terms and conditions, e.g. by individuals under 18). Our use of your Personal Data for these purposes is necessary in our legitimate interests and will be retained for a period of completing the purpose;
- 6) **allowing you to participate in sweepstakes, contests or other promotions.** Your Personal Data such as: *name, email, telephone number*, will be processed to administer our sweepstakes, contests or other promotions in which you choose to participate. Some of these promotions have additional rules containing information about how we will use and disclose your Personal Data. We use this information to manage our contractual relationship with you.

### **3. How We Share Your Personal Data**

We may need to share Personal Data with third parties to help us provide services and products to you and to run our Website. These third parties are:

- HEINEKEN group companies for the purpose of storing Personal Data processed via the Website, due to shared IT systems;
- service providers where this is needed to provide us with a service or to (help us) provide or deliver the service or product ordered by you on the Website (including our third party delivery provider) and to provide data analytics services;
- independent debt recovery agencies, solicitors or other agents for the purpose of collecting monies due or outstanding on your account;
- in case HEINEKEN sells all or some of the assets or shares of a HEINEKEN group company to which Personal Data was transferred to a third party, your Personal Data may be provided to this third party.

These parties may be located in Czech Republic, other countries in the European Economic Area or elsewhere in the world. When Personal Data is stored by us outside the EEA we will ensure an adequate level of protection of the transferred Data. We require service providers to use appropriate measures to protect the confidentiality and security of the Personal Data.

We may also need to provide Personal Data to law enforcement bodies in order to comply with any legal obligation or court order.

### **4. Security of Personal Data**

We will take appropriate technical, physical and organizational measures to protect the Personal Data collected through the Website from misuse or accidental, unlawful or unauthorized destruction, loss, alteration, disclosure, acquisition or access, that are consistent with applicable privacy and data security laws and regulations. However, no internet-based site can be 100% secure and we cannot be held responsible for unauthorised or unintended access that is beyond our control.

Our Website may contain links to other websites. We are not responsible for the privacy practices, content or security used by such other websites, which shall not be governed by this Privacy Policy. We advise you to always carefully read the privacy policies on these other websites.

### **5. Retention of Your Personal Data**

We will retain your Personal Data for as long as legally required or for as long as necessary to provide you with any requested services or for any of the other purposes listed in this Privacy Policy. The specific retention term are listed in this Privacy Policy for each of the relevant purposes. We will take reasonable steps to destroy or de-identify Personal Data we hold if it is no longer needed for the purposes set out above or after the expiration of the defined retention term.

### **6. Cookies**

A major part of the information referred to in this Privacy Policy is collected via our use of cookies and similar techniques. Cookies are small text files containing small amounts of information which are downloaded and may be stored on your user device, e.g. your computer, smartphone or table. Techniques we use that may be similar to cookies are tracking pixels, Java scripts, tags and web beacons. These cookies and similar techniques are sometimes necessary to remember your account settings, language and country, but also enable us to measure and analyse your behaviour on our Website and for showing you personalised advertisements on our Website or on third party websites. Where required, you will be asked for consent to our use of cookies. To view more information on what cookies we use and how we use them please review our separate [Cookie Policy](#).

## **7. Social Media**

You may choose to share information on our Website via social media, such as Facebook, Instagram, LinkedIn, YouTube. This means that the information you share, with name and preferences, shall be visible to visitors of your personal pages. We advise you to carefully read the privacy policies of the social media parties as these are applicable to the processing of your Personal Data by these parties.

## **8. Children's Privacy**

The Website is not intended for use by individuals under the age of 18. We do not knowingly collect Personal Data from individuals under the age of 18.

## **9. Your Rights to Access, Rectification, Deletion, Restriction and Data Portability**

You have the right to request an overview of your Personal Data processed by or on behalf of us. You have the right to have your Data rectified, deleted or restricted (as appropriate). You can exercise this right by contacting the email address below. Please note that requests that do not meet the requirements set out by applicable law or HEINEKEN guidelines may be requested to be re-issued or ultimately denied and that certain Personal Data may be exempt from such access, rectification and deletion requests pursuant to applicable data protection laws or other laws and regulations. We will retain Personal Data where it is legally required for us to do so.

You have the right to receive the Personal Data that you have provided to us in a structured, commonly used and machine-readable format, and in certain circumstances we will, at your request, transmit your Data to another controller where this is technically feasible.

## **10. Your Right to Object**

You also have a right, in certain circumstances, to require us to stop processing your Personal Data, but where we have compelling legitimate grounds, we will continue processing your Personal Data. However, you have the right to object to our use of your Personal Data for direct marketing purposes, including profiling, and when you do so, we will accommodate your request. Where you have provided consent to our use of your Personal Data, you have the right to withdraw your consent without this effecting the lawfulness of our use of this Data before your withdrawal.

## **11. Updates**

We will keep this Privacy Policy under review and make updates from time to time. Any changes to this Privacy Policy will be posted on our Website page and to the extent reasonably possible, will be communicated to you.

## **12. Contact**

If you wish to exercise any of your rights listed in paragraph above, you have any other question, objection to our use of your Personal Data or a complaint about this Privacy Policy or about our handling of your Personal Data, you can mail at [osobniudaje@heineken.com](mailto:osobniudaje@heineken.com). Please note that we may request proof of identity. You also have the right to file a complaint with your local data protection authority- Úřad na ochranu osobních údajů ([posta@uouu.cz](mailto:posta@uouu.cz)).

### **Controller:**

Heineken Česká republika, a.s., address: Krušovice, U Pivovaru 1, PSČ 270 53, IČO 45148066, zapsaná u Městského soudu v Praze, spisová značka 1515 B