

## **PRIVACY POLICY: MIKE'S INSTANT WIN**

Dear Consumer

AB InBev would like to ensure that you feel safe about the processing of your personal data. To do so, we would like to provide you with this comprehensive notice on how we handle your data for this operation. This notice is designed to transparently inform you about how AB InBev collects, uses and transfers your personal data, and what your rights as a data subject are. This notice is limited to the processing of your personal data for the marketing activity of 'Mike's Instant Win' and on this website.

### **1. Data Controller and Imprint**

AB InBev UK Limited T/A Budweiser Brewing Group UK&I is the data controller of this processing operation. We are committed to the protection of your personal data and we would like you to always feel free to approach us at any point of time at the following address:

Registration number: 3982132, registered in England and Wales

Address: Bureau, 90 Fetter Lane, London, EC4A 1EN

Tel: +44 0870 606 8008

E-mail: [consumer.helpline@ab-inbev.com](mailto:consumer.helpline@ab-inbev.com)

Value added tax (VAT) number: GB745737502

### **2. Data Processing and Uses**

#### **2.1 Data flow for marketing activity**

Under this section, we would like to explain the data flow to you. Data flow, in essence, refers to the journey of your personal data from start to the end of this operation. The data flow for this processing operation has been described in detail below and is segregated into three stages: Participation, playing game and concluding steps.

**(a) Participation:** We run a promotion in Tesco stores wherein we provide you with QR codes that can be scanned from our products that you purchase. If you decide to scan the QR code displayed on the product, you will be re-directed towards our website. Our website contains a game that you can choose to play as per your wish. This game will randomly select winners who would win 5 flow riding experiences and 1000 pairs of sliders.

**(b) Playing game:** When you play this game, we obtain some personal data from you. We do so to ensure that (a) if prize is won, there are means of contacting you and (b) that you do not play game more than permissible number of times. It is completely your decision for deciding to play this game. If you would like to withdraw consent later on, you will have an option to withdraw consent, you must write to [consumer.helpline@ab-inbev.com](mailto:consumer.helpline@ab-inbev.com).

**(c) Concluding steps:** If you win, we will contact you and ask for further details (home address, age, full name and phone number) so that the prizes can be delivered.

If you do not win, we will retain your data until 31<sup>st</sup> December 2021. The reason behind retaining this data is to ensure that you only play permissible number of times. Until 31<sup>st</sup> December 2021, cross-referencing will be performed in this regard.

## **2.2 Data processing on website**

Through your visit on our website, we may collect your personal information in the following ways:

- (a) Through information requests to enter certain information on the website or sign up for competitions or contests. We may ask you for certain information e.g., your name, age, street address, city, postcode, mobile telephone number and email address. We use this information to contact you to confirm that you participate in a competition or sweepstake or to notify you that you have been selected as a winner.
- (b) Through cookies and other similar technologies that help us to offer you a better browsing experience, enhancing site navigation, analyzing site usage and assisting in our marketing efforts.;
- (c) Through some website development technologies on our website which are technically necessary to display the content (usage data). We review the usage data in our protocols to improve the quality of the website and ensure that the website is displayed to you. The usage data includes the name and address of the requested content, date and time of the query, data volume, description of the web browser and operating system and the referral link which indicates from which page you reached our website. This information is necessary for the developers to make sure that our website is displayed to you in a timely manner.

- (d) Through newsletter registrations and sign-ups and to send you mailings or other marketing information about our brands and our companies in which we think you would be interested through email / mail / SMS messaging (ONLY if you have expressly given us permission to do so.) You receive information on how to unsubscribe or stop any marketing material from us.;
- (e) Through information you provide to us in comments, suggestions or other information relating to our website, our products or services. We may ask you for certain information e.g., your name, age, street address, city, postcode, mobile telephone number and/or email address. We offer you the possibility to create an account and to use it within AB InBev as we continue to work on being the best beer company in a better world (this use is only with respect to your comments or suggestions).;
- (f) Other specific types of information may be requested in connection with purchases, product claims and creating an account. We use this data to fulfill your order, incl. shipping and payment and to comply with our legal obligations, e.g., keeping correct financial accounting.;
- (g) The entity mentioned under imprint and its agents will retain your personal information only as long as necessary for fulfilment of the purposes described above or as required by law.

### **2.3 Cookies and similar technologies**

Cookies are small pieces of data being placed on the hard drive of a visitor's device. With the help of cookies, we can store information for a certain period of time and identify your device for the purposes mentioned below.

- (a) Cookies will be stored on your device for a determined time period and then they are deleted. These periods may vary depending on the type of cookies. Some cookies will be stored only for the time you are visiting our website (session cookie) and are automatically deleted once you close your browser, others cookies will be stored for a longer period than your session (persistent cookies).
- (b) On this website we also use technologies that function similar to cookies such as local shared objects. These are small data files that enhance your web-browsing experience, for example, by allowing you to personalize the look a website that you frequently visit.

- (c) We transparently inform you about our use of cookies and similar technologies below. In case you would like to further understand more about these technologies, you can as well set your browser settings to inform you about the cookies or similar technologies downloaded to your device.
- (d) In case you would like to change your cookies preferences, please go to "cookie settings" at the end of the "cookies" section of this privacy policy."

#### **2.4 Website tracking technologies**

Integrated into this website are targeted advertising tools. These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store directly personal information, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

- (a) Cookie and similar technologies and enable us to analyze the visitor's use of our website. For this purpose, the generated information in the cookie (including your IP-address) is sent to us and stored to enable us to optimize the use of our website and/or provide you with advertisements tailored to your interests. We process your personal data on the basis of your consent pursuant to Art. 6 (1)(a) UK GDPR for the purposes explained above.
- (b) After selecting your cookie preferences, your consent will be obtained and registered via our cookie banner. You may preclude the usage of targeting cookies and similar technologies by selecting the appropriate settings in your browser or in the "cookie settings". Be aware that in this case it may occur that you may not be able to use all functions of this website. Depending on the browser you use you can also install a browser plug-in to prevent tracking.
- (c) **Newsletter:** On our website, you have the option of subscribing to our free newsletter. We use the double-opt-in procedure for subscription. Once you submit the subscription form to us, you will receive a confirmation email from us. Your subscription will be activated only after you have clicked on the link in the confirmation email. You can unsubscribe from the newsletter at any time. To do so, use the unsubscribe link at the end of each email. Your email address will then be deleted immediately from the distribution system. By subscribing to the newsletter, you agree to the following declarations of consent: I agree to receive advertising from AB InBev and its subsidiaries in the form of newsletters. We are processing your personal data according to Art. 6 (1) (a) GDPR. The provision of such data is necessary in order to provide you with our newsletters. You can use the link under each email to unsubscribe from our marketing messages. Alternatively, you may send us a request using the contact details at the bottom of this policy. Please note, we will still continue to send you information relating to ongoing business relationships with you or other purposes, such as to any account you may hold with us, or any business relationship you may have

with us, such as a request you have made for or about our goods and services (such as transactional messages e.g., about sweepstakes in which you may have entered).

**(d) Data Management Platforms:** Your data may be collected processed in our Data Management Platform (DMP) operated by Salesforce.com, Inc. Our purpose of using DMP is to ensure that you receive advertisements tailored to your interests in our and other sites that you visit. A DMP is an advertising technology that automatically creates audience segments to share the best of our campaigns. A DMP uses cookie and non-cookie technologies to recognize your computer or device and/or to collect and record information about your web surfing activity including your activities on or off this website. DMP automatically analyses and categorizes data deriving from different sources for example other sites and from other beer lovers. We will only process your personal data for this purpose after you have provided us you consent, in accordance with Art. 6 (1) (a) GDPR. You will not suffer any detriment if you would like your data not to be send to one or all DMP providers. You can withdraw your consent on the cookie banner.

After you consent to this operation, our DMP will start processing your data and it will be shared with other parties such as publishers, marketing data providers and business partners. Salesforce.com,Inc. is another data controller who carries out data processing upon whom we however have only limited influence. In case you would like to know more about this technology please review the information provided by the Salesforce.com, Inc. for further guidance. <https://www.salesforce.com/products/marketing-cloud/sfmc/audience-studio-privacy/>

**(e) Customer Data Platform:** Our website has in place a Customer Data Platform (CDP). Our purpose in using CDP is to ensure that you receive advertisement content tailored to your interests in our websites and also in external sites you visit. A CDP is an advertising technology that automatically creates audience segments to share the best of our campaigns with you and other beer lovers. Our CDP automatically analyses and categorizes data deriving from different sources, for example, other sites and other website users. We will only process your personal data after you provide us your consent, following Art. 6 (1) (a) GDPR. You will not suffer any detriment if you don't consent to this operation.

Once consent is provided, our CDP will start processing your data and it will be shared with other business partners of ARM Treasure Data using the same tool. The data controller for this operation is Treasure Data, Inc., so please keep in mind that AB InBev has no control over who your data is shared with as this is unilaterally determined by the CDP. As the technology of a CDP is very complex and various stakeholders are involved, in case you would like to know more about this operation please review the information provided by the Treasure Data, Inc. for further guidance. (<https://www.treasuredata.com/privacy/>).

**(f) Social Media Plug-ins:** We place various social media buttons on our website in the form of a plug-in. Following are the social media buttons used:

-Facebook

-Twitter

-YouTube

-Instagram

Please be aware that by visiting a website which integrates social media plugins, certain data (your current IP address, visited sites, the date and time the website etc.) is forwarded to these social media services even if you are not registered with these services. If you are already logged into the social media service when you click on the social media button, the social media service may also use this data to identify your user name and possibly even your real name. We have no control over the extent, nature and purpose of such data processing by the social media service. Please note that the social media service is perfectly capable of using this data to create pseudonymised and even individualised user profiles. You can find further information about data protection regarding social platforms on the privacy policies provided by the social media platforms.

**(g) Social Links:** We place various social media buttons on our platform in the form of links. Please find below the social media buttons used in this website such as Instagram, Twitter, Facebook, Pinterest and Youtube. We do only display a button on our platform and do not integrate any social media plugins. Personal data from you will only be transferred to the social media provider if you click on the button. If you are already logged into the social media service when you click on the social media button, the social media service may also use this data to identify your user name and possibly even your real name. We have no control over the extent, nature and purpose of such data processing by the social media service. Please note that the social media service is perfectly capable of using this data to create pseudonymised and even individualised user profiles. You can find further information about data protection regarding social platforms on the privacy policies provided by the social media platforms.

**(h) Look a Like Audiences:** We use different technologies to create look a like audiences on social media. We may share hashed portions of your personal data (mainly your name and other online identifiers, email address) with our marketing partners and publishers to provide you advertisement in accordance to your interests and/or those of like-minded consumers. For example, we may aggregate your email address together with the email addresses of others who registered to our marketing activities, locally hash such data, and transmit the resulting hashed data to Facebook or to other marketing partners for the purpose of creating "Lookalike Audiences" (where targeted ads are sent to people on Facebook who have similar characteristics to people on our customer list), we request your consent in order to create look-a-like audiences

via email or the cookie banner. If you wish to withdraw your consent, please update your settings in the cookie banner.

**(i) Facebook Pixel:** A Facebook pixel is an analytics tool that consists of a code that is installed on our website. When you perform certain activities on our website, such as visiting a web page or buy a product, the Facebook pixel is triggered and will collect this information in the Facebook environment, if you are using Facebook. This technology allows us to provide users customised content and advertising, to provide social media features and to analyse traffic to our website. The Facebook pixel may collect personal data from you, including:

- Operating system used
- Type of website used, for example on mobile or desktop
- Type of client used, for example a browser or mail program.
- Client's screen resolution
- Time the website was visited
- Activities on the website during a session (when using multiple tracking pixels)
- IP address (provides information on the Internet Service Provider and location)

Your personal data will not be processed by any third party other than Facebook for this operation.

## **2.5 Legal Drinking Age**

This website is not intended for individuals under the legal drinking age. Therefore, we perform age checks upon visiting the website. If we later learn that an individual under the legal drinking age has provided us with personal information, we will delete it. Please do not share or forward this website or its contents to anyone underage.

## **2.6 Personal data**

AB InBev will process the following categories of personal data:

- (e) Your full name;
- (f) Your email address;
- (g) Your home address (only where prize is won);
- (h) Your age, IP address and data obtained from the use of website through cookies and other tracking technologies; and
- (i) Your phone number (only where prize is won); and

- (j) Personal data obtained on website, such as through processing operations running on this website, cookies and other tracking technologies.

We will not process any special categories of personal data under this operation.

## **2.7 Legal basis**

We are committed to the protection of your fundamental rights. We always ensure that there is a legal basis for us to lawfully process your personal data. We will not use your personal data for purposes other than the ones specified above in this Privacy Policy.

- We process your personal data during the marketing operation as you have given consent to the processing of your personal data for the purposes of participating in this marketing activity, in line with Art. 6(1)(a) UK GDPR. We always provide you with an option to withdraw your consent and ensure that you do not face any consequences as a result of this withdrawal.
- We mostly process your personal data on our website based on your consent, in line with Art. 6(1)(a) UK GDPR. In very specific cases, the processing of your personal data will be based on our legitimate interests, in line with Art. 6(1)(f) UK GDPR that does not impact your fundamental rights and freedoms.
- Legal basis for cookies: For "Strictly Necessary cookies" we are processing your personal data according to Art. 6 (1) (f) GDPR for the legitimate purposes. With regards to "Performance Cookies", "Functional Cookies" and "Targeting cookies", we are processing your personal data based on your consent according to Art. 6 (1) (a) GDPR for the purposes explained below. Your consent is collected and registered following the selection of your cookie preferences in our cookie banner.

## **3. Data Retention**

Marketing activities: We keep your personal data until 31<sup>st</sup> of December in case you do not win a prize, until 31<sup>st</sup> of December in case you win a prize and/or always in accordance with the applicable laws.

Cookies and tracking technologies: We keep your personal data until you withdraw your consent, when it is no longer necessary for the original purpose and/or always in accordance with the applicable laws.



Website and processing operations on the website: We keep your personal data until you withdraw your consent, when it is no longer necessary for the original purpose and/or always in accordance with the applicable laws.

#### **4. Data Transfers to Third Parties**

**We** have contracted with some third parties who will provide us with the support to carry out this operation. We may transfer some of your personal data to such third parties for the performance of this processing operation and where this is the case, the transfer and data processing takes place only in accordance with applicable laws and is regulated by legal agreements, if applicable.

Personal information is sent overseas in limited circumstances to other subsidiaries of our corporate group whose parent company is the Belgian company, ANHEUSER-BUSCH INBEV S.A./N.V. with registration number 0417.497.106, to provide hosting services and support services within the group. AB InBev will not send your personal information to a recipient outside the EU / the EEA without obtaining your consent or otherwise complying with the relevant privacy legislation.

#### **5. Data Subject Rights**

You have the right to request that your personal data kept by AB InBev is accessed by you, rectified, if it is incomplete or inaccurate, or that it is erased or blocked. You also have the right to object to the processing based on your particular situation. You have the right to lodge a complaint with the Information Commissioner's Office' (ICO) in the United Kingdom, if you consider that our processing of your personal data infringes your rights. The ICO can be contacted using the following hotline 03031231113 or via a web form or chat that is available here: <https://ico.org.uk/global/contact-us/>.

#### **6. Security Measures**

We adopt technical and organizational measures to protect your data as comprehensively as possible. In addition to the commitment of our employees to secrecy and a careful selection and monitoring of our service providers, we also secure our operating environment adequately.

#### **7. Contact details of the Data Protection Officer**

If you have any questions, comments or complaints, please contact our data privacy officer FIRST PRIVACY GmbH at web: [www.first-privacy.com](http://www.first-privacy.com) or email: [abi-team@first-privacy.com](mailto:abi-team@first-privacy.com).

