**Privacy Policy**

[version 1.0 updated on 17/12/2021]

This privacy policy ("Privacy Policy") forms an electronic contract within the provisions of the (Indian) Information Technology Act, 2000 ("IT Act") and the rules made thereunder and the amended provisions pertaining to electronic documents/records in various statutes as amended by the IT Act, from time to time. This Privacy Policy does not require any physical, electronic or digital signature and this Privacy Policy shall be a legally binding document between you and AB InBev India Pvt Ltd. To ensure that you feel safe and happy, the following information gives you a comprehensive guide as to what we do with your personal data and more specifically how we collect, use and pass on your personal data.

This Privacy Policy describes how your personal data is secured and how you can contact us about our privacy practices, including:

**1.** Data collection: What information do we collect?

**2.** For which purposes do we use your information and on which legal bases?

**3.** How do we share your information?

**4.** What are your rights?

**5.** Who can you contact in case you have questions or requests? The data protection contact point

**6.** International Transfers

**7.** Security

**8.** Children’s Privacy

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Please read this Privacy Policy before using or submitting any personal data.

**By providing consent, you confirm that you have read and that you understand the way we collect, process, use and disclose your personal data as described herein.**

Our records of your acceptance of this Privacy Policy, the date thereof, and of all future amendments to this Policy, shall be regarded as conclusive and written evidence of your consent.

# Data collection: What information do we collect?

Depending on the purpose of the processing, we need to process the following categories of personal data about you:

* your **personal details** (for example, your name, gender, age) which you are asked to provide,
* your **contact details** (for example, your e-mail address, phone number), e.g. if you register for our newsletter or if we need to communicate with you in relation to Services you have requested;
* **commercial** information (for example, if you have subscribed to our newsletter, participated to a competition, loyalty program or survey);

Remember that, when we ask you to fill in your personal data to give you access to any Service, we will mark certain fields as compulsory, since this information is necessary to be able to give you access to the Services in question. Please take into account that, if you decide not to make such data available to us, you may be unable to complete your user registration or may not be able to enjoy those Services.

# For which purposes do we use your information and on which legal bases?

Depending on the Services that you wish to use, we will process your personal data for the following purposes, as justified on the following legal bases:

|  |  |
| --- | --- |
| **PURPOSE** | **LEGAL BASIS** |
| **To manage your registration** on the [App/Website] and grant you access to the Services available to registered users. | Your personal data will be processed because the processing is necessary for the entering, or taking steps to **enter into a contract** with you at your request. |
| **To provide, manage, and improve our products and Services.** We may use your information to provide, manage, and improve our operations, features and services, including to:   * deliver the Services; * personalize content; * understand how you use and interact with the Services; * contact you for updates or informative notices related to our products and services (e.g., via quality surveys); * to answer your questions about our products and services. | Your personal data will be processed because the processing is necessary:   * for the performance of the service **contract** entered with you; * to comply with a **legal obligation** to which we are subject (for example, to respond to your request to exercise your rights); or * for the purposes of our **legitimate interests** consisting in answering the requests or queries raised by you and in providing a higher quality service. |
| **For** **analytic and statistic purposes**, i.e., to understand the manner in which you interact with our store and thus be capable of introducing improvements in your experience. | Your personal data will be processed because the processing is necessary for the purposes of our **legitimate interests** consisting in improving the user experience. |
| **To protect the rights of the services and others.** We may use your information as necessary in connection with corporate transactions or to protect, enforce, or defend the legal rights, privacy, safety, or property of the Services, our employees or agents, or other users and to comply with applicable law. | Your personal data will be processed because the processing is necessary:   * to comply with a **legal obligation** to which we are subject (for example, to guarantee the security of the personal data we process); or * for the purposes of our **legitimate interests** consisting in safeguarding our rights and our property and those of our employees, agents or users or in performing corporate transactions. |
| **For marketing purposes**, including profiling related to such direct marketing:   * if you subscribe to our newsletter, to manage your subscription and, as you elected, send you (personalized) information on our products or services through various means (such as e-mail or SMS); * to perform promotional actions (for example, for the organization of competitions or loyalty programs), in which case your personal data will be processed as described in the available terms and conditions of this specific promotional action. | Your personal data will be processed:   * based on your **consent** (for example when you accept receiving personalized information or when accepting the terms and conditions to participate in a promotional action), it being noted that you have the right to withdraw your consent at any time; or * because the processing is necessary for the purposes of our **legitimate interests** to inform our existing customers about similar products or services we provided, it being noted that you have the right to object at any time to such further processing. |

We will only process your personal data for specified, explicit and legitimate purposes and we will not process your personal data further in a way that is incompatible with those purposes. Where required under applicable law, we will also collect your express consent to any of the above-mentioned activities. You have the right to withdraw any given consent at any time.

# How do we share your information?

For the purposes for which we collect your personal data and subject to the appropriate legal basis described under Section 2 above, we may disclose your personal data to the following categories of recipients:

a) Authorised staff members who access your personal data on a need-to-know basis;

b) Affiliates and subsidiary companies, primarily for business and operational purposes;

c) Business partners: trusted companies that may use your personal data to provide you with the Service(s) you requested and/or that may provide you with marketing materials (provided that you have consented to receiving such marketing materials).

d) Service providers: companies that provide Services to us, for the purposes of providing our Services.

e) Other parties when required by law: We may share your personal data with other third parties:

- to comply with the law, regulatory requests, court orders, subpoena, or legal processes;

- to verify or enforce compliance with policies and agreements; and

- to protect the rights, property or safety of Krishna Enterprises, its customers, visitors to this store and/or the public;

f) Other parties in connection with corporate transactions such as a merger, acquisition, sale of assets, joint venture, or any other transaction that results in a change in control or ownership of Krishna Enterprises, in whole or in part;

g) Other parties with your consent or upon your instruction: We may share your personal data with third parties when you consent to or request such sharing; and

Please be aware that service providers who may offer products and/or services to you through their services or via their own channels may separately collect personal data from you. In such case, we are not responsible for the collection of this data. These third parties are solely responsible for the control of such personal data and the processing of your data will be subject to their Privacy Policy.

The above recipients of your personal data may be located within or outside the EEA, including in countries not recognized by the European Commission as offering an adequate level of protection of personal data.

# What are your rights?

Under the conditions set forth under applicable data protection laws, you have the right to access and rectify your personal data, as well as the right to object at any time to the processing of your personal data for direct marketing purposes, including profiling related to such direct marketing, and, in certain cases, to object to the processing based on grounds relating to your particular situation. In addition, you have the right to request the restriction of the processing and the erasure of your personal data (right to be forgotten) as well as the right to data portability. When the processing of personal data is based on you consent, you have the right to withdraw your consent at any time.

You can exercise these rights by sending a written request to our data protection contact (see Section 5 “WHO CAN YOU CONTACT IN CASE YOU HAVE QUESTIONS OR REQUESTS?”).

If you require further information in relation to your privacy rights or would like to exercise any of these rights, please also contact our data protection officer (see Section 5 “WHO CAN YOU CONTACT IN CASE YOU HAVE QUESTIONS OR REQUESTS?”).

# Who can you contact in case you have questions or requests? The data protection contact point

Krishna Enterprises has in place a data protection contact point available for you to submit your questions or requests relating to the processing of your personal data: digital@in.ab-inbev.com

When you exercise these rights, we may collect your name, e-mail address and your request details. Please be aware that we only require your e-mail address and request in order to process your request. Other details are optional for you to share with us. Your personal details will be saved only so that we can respond to your request, and will subsequently be deleted, unless there are legal requirements stipulating the retention of these data.

Please contact our data protection contact point or our data protection officer indicated above if you wish to exercise your rights as data subject in the terms described in Section 4.

# International Transfers

The information is hosted by servers located in India]. In connection with any transfer of your personal data to outside the European Economic Area (= member states of the European Union + Iceland, Norway, and Liechtenstein, “EEA”) in countries that are not recognized by the European Commission as offering an adequate level of data protection (no 'adequacy decision'), we implement appropriate safeguards to ensure an adequate level of protection of your personal data. These safeguards can for instance consist in agreeing with recipients on standard data protection clauses in the form of entering into template model clauses such as the Standard Contractual Clauses for the transfer of personal data to third parties adopted by the European Commission guaranteeing such adequate level of protection.

# Security

We ensure that appropriate technical and organisational security measures are taken against unlawful or unauthorised access or use of your personal data, as well as against accidental loss or damage to the integrity of your personal data.

We update and test our security technology on an ongoing basis. We restrict access to your personal data to those employees who need to know that information to provide benefits or Services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

Your personal data will only be processed by a third party data processor if that data processor agrees to comply with those technical and organisational data security measures.

Maintaining data security means guaranteeing the confidentiality, integrity and availability of your personal data:

(a) Confidentiality: we will protect your personal data from disclosure to third parties.

(b) Integrity: we will protect your personal data from being modified by unauthorised third parties.

(c) Availability: we will ensure that authorized parties are able to access your personal data when needed.

# Children’s Privacy

Our Services are not intended for individuals under the legal drinking age. If we learn that an individual under the legal drinking age has provided us with personal information, we will delete it.

# Changes to this Privacy Policy

Except to the extent limited by applicable law, we may decide at any time − at its discretion − to change, modify, and/or add all or parts of this Privacy Policy in the future. Any change to this Privacy Policy will be notified to you by e-mail (where appropriate or required by law and to the extent that we have your e-mail address). We will indicate at the top of this Privacy Policy the date on which the Policy was last modified.

Where required by law, we may also ask you to expressly confirm your consent to the modified Privacy Policy.