

## PRIVACY POLICY

*Last updated: October 30, 2023*

We, Coca-Cola Beverages Vietnam Ltd take your privacy seriously. Our mission is to refresh the world, and we can't do that without your trust. This Privacy Policy explains what data we collect about you, why we collect the data, as well as how we collect and use the data so that we can deliver the best, most refreshing experience that we can.

### 1. PERSONAL DATA

#### 1.1 Personal Data We May Collect

"**Personal Data**" is any information associated with you or enabling the determination of your identity, such as:

- Family name, middle name and given name stated in the birth certificate, other name(s) such as username;
- Date of birth;
- Gender;
- Place of birth, place of birth registration, permanent residence, temporary residence, current residence, hometown, contact address;
- Nationality;
- Personal images;
- Telephone number;
- People's identity card number, personal identification number, passport number;
- Email address;
- Social media account ID;
- Information about family relationship (parents, children);
- Driving license number;
- Vehicle registration plate number;
- Personal tax code;
- Social insurance number;

- Health insurance card number;
- Marital status;
- Digital account information of individuals;
- Other information associated with a specific person or enabling the identification of a specific person.

Some of the Personal Data we may collect subject to case by case can be considered sensitive Personal Data, such as:

- Credit and debit card number;
- Religious opinions;
- Information about racial origin;
- Information about unique biological characteristics;
- Information about sexual orientation;
- Location data of an individual determined by location services;
- Health condition and private life stated in medical record, excluding information on blood type;
- Information about ethnic origin;
- Information about physical attributes;
- Data on crimes and criminal activities collected and stored by law enforcement agencies;
- Information on customers' accounts of credit institutions, foreign bank branches, payment intermediary service providers, other authorized organizations
- Other information regulated by the law regulations.

If you submit any Personal Data relating to other people to us or to our service providers, you represent that you have the authority to do so and to permit us to use such Personal Data in accordance with this Privacy Policy.

## **1.2 How We May Use and Process Personal Data**

To the extent permitted by applicable law, we may collect, use, disclose or otherwise process your Personal Data, using automated or non-automated means and where relevant to our relationship with you:

- to respond to your inquiries and fulfill your requests, such as to send you newsletters or to respond to your questions and comments.
- to send administrative information to you, for example, information regarding the Sites and changes to our terms, conditions, and policies. Because this information may be important to your use of the Sites, you may not opt-out of receiving these communications.
- to provide you with updates and announcements concerning our products, promotions, marketing activities and programs and to send you invitations to participate in special programs via the Sites.
- to re-contact you if we have not heard from you in a while.
- to send you advertising/promotional material from any of our affiliates, and from our promotional and strategic partners.
- to personalize your experience on the Sites by presenting products and offers tailored to you.
- to process rewards, and prizes, as applicable.
- to allow you to participate in polls, sweepstakes, instant win promotions, contests and other promotions and to administer these activities. Some of these activities have additional rules, which could contain additional information about how we use and disclose your Personal Data, so it is important that you read the additional rules carefully.
- to permit you to participate on message boards, chat, profile pages and blogs and other services to which you are able to post information and materials (including our official social media pages we control). Please note that any information you post or disclose through these services will become public information and may be available to visitors to the Sites and to the general public. We urge you to be very careful when deciding to disclose your Personal Data, or any other information, on the Sites. Please see the "Rights and Obligations" section below, to learn how you may request removal of your posts.
- to permit you to participate in social sharing, including live social media feeds.
- to assess your eligibility to participate in our events, programs, contests, and to facilitate the organization of the events, programs, contests.
- to perform the contract to which you are a party or in order to take steps prior to entering into such a contract.
- to protect our visitors, staff, premises and company assets from damage, disruption, vandalism and other violations.

- for our business purposes, such as analyzing and managing our businesses, market research, audits, developing new products, enhancing our Sites, improving our services and products, identifying usage trends, determining the effectiveness of our promotional campaigns, tailoring the Sites experience and content based on your past activities on the Sites, and gauging customer satisfaction and providing customer service (including troubleshooting in connection with customer issues).
- as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
- other processing purposes serving our business operation (if any).

Where required by laws, we will seek your consent for our processing of your Personal Data. However, please note that in certain circumstances and in accordance with laws, we can process your Personal Data without your consent, including but not limited to when the processing is necessary to perform a contractual or legal obligation.

### **How Personal Data May Be Disclosed**

To the extent permitted by applicable law, your Personal Data may be disclosed:

- to our affiliates for the purposes described in this Privacy Policy.
- to our third-party service providers who provide services such as website hosting, data analysis, payment processing, order fulfillment, infrastructure provision, IT services, event and promotion management, customer service, email delivery services, credit card processing, auditing services and other similar services to enable them to provide services.
- to our third-party strategic partners with whom we may enter into a special relationship. We will provide you with choices regarding this sharing prior to sharing your Personal Data with a particular strategic partner. Because these third parties will use your Personal Data in accordance with their own privacy practices, you should check their websites for information regarding their privacy practices.
- In connection with promotions, for example, to third parties that are sponsors of sweepstakes, instant win promotions, contests and other promotions, to provide lists of the names and countries of residence of winners and/or to announce the names of visitors on the Sites (e.g., on our blog)

or otherwise in accordance with the rules applicable to the applicable promotion. To the extent that the terms and conditions of the rules concerning the treatment of your Personal Data conflict with this Privacy Policy, the terms and conditions of the rules shall control.

- to identify you to anyone to whom you send messages through the Sites.
- by you, on message boards, chat, profile pages and blogs and other services to which you are able to post information and materials (including our official social media pages we control). Please note that any information you post or disclose through these services will become public information and may be available to visitors to the Sites and to the general public. We urge you to be very careful when deciding to disclose your Personal Data, or any other information, on the Sites.
- if you participate in social sharing (such as if you connect your social media account to your Site account or log-into your Site account from your social media account), to your friends associated with your social media account, to other users of the Sites and to your social media account provider, in connection with your social sharing activity. For example, if you register on the Sites using a social media account, we may post a generic registration message on your social media profile, and if you click a social media "like" button on a Site while logged in to your social media account, your actions will be transmitted to the applicable social media provider and may be available on your social media profile. By connecting your Site account and your social media account, you authorize us to share information with your social media account provider and you understand that the use of the information we share will be governed by the social media site's privacy policy. If you do not want your Personal Data shared with other users or with your social media account provider, please do not connect your social media account with your Site account and do not participate in social sharing on the Sites.
- by you, if you participate in a live social media feed (which you may do, for example, by referencing us in your social media post or "liking" us on a social media platform). If you do participate, your public username and profile photo may be displayed on the Sites along with your post.
- to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you

or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

- other processing purposes serving our business operation (if any).

## **2. SECURITY**

We use reasonable organizational, technical and administrative measures to protect Personal Data under our control. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the "Contacting Us" section below (note that physical mail notification will delay the time it takes for us to respond to the problem).

## **3. RETENTION PERIOD**

We will retain your Personal Data for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

## **4. CROSS-BORDER TRANSFER**

Your Personal Data may be transferred to countries outside of your country of residence, which may provide for different but comparable data protection rules than in your country.

## **5. RIGHTS AND OBLIGATIONS**

### **5.1 Rights**

As a data subject, you have rights in respect of Personal Data under applicable laws such as the right to know, to consent to the processing of Personal Data, to access and correct Personal Data, to object to the processing of Personal Data for advertising and marketing purposes, to self-protection and request competent agencies and organizations to protect your rights, and other rights in accordance with the laws.

### **5.2 Obligations**

As a data subject, you have the following obligations:

- Protect your Personal Data; request relevant organizations and individuals to protect your Personal Data.
- Respect and protect others' Personal Data.
- Fully and accurately provide your Personal Data when consenting to the processing of your Personal Data.
- Participate in the dissemination of Personal Data protection skills.

- Comply with regulations of the laws on protection of Personal Data and prevent violations against regulations on Personal Data protection.

## **6. CONTACTING US**

If you have any questions or complaints about this Privacy Policy or our Personal Data processing operations, you may email us at: [privacyccbvl@coca-cola.com.vn](mailto:privacyccbvl@coca-cola.com.vn)

Please note that email communications are not always secure, so please do not include credit card information or sensitive information in your email to us.