

Privacy Policy

Swire Coca-Cola Limited T/A Swire Coca-Cola HK

(May 2024)

Our Commitment to Protect Your Privacy

Swire Coca-Cola Limited T/A Swire Coca-Cola HK (“SCCHK”, “we”, “our” or “us”) highly values your personal information and privacy and is committed to preserving the confidentiality and security of all personal information. When you use our services, you entrust us with your personal information. This Privacy Policy sets out the standards and expectations on SCCHK’s commitment to safeguarding your personal information in terms of what information we gather about you, how we use and process that information and who we give that information to. It also defines your rights in relation to your personal information and who you can contact for more information or queries.

SCCHK pledges to meet and comply with the obligations and requirements under the Hong Kong SAR Personal Data (Privacy) Ordinance – Cap.486 (“Ordinance”). SCCHK committed itself to protect and keep in strictly confidential in related to any personal data it collected.

To ensure that you feel comfortable and confident about providing your personal information for us, please read this Privacy Policy carefully to understand how and why we collect and process your personal information.

We will notify you when there are any changes to our Privacy Policy, including by posting the revised policy on our website. The changes will be effective from the date of posting.

1. What this Privacy Policy covers and Who it applies to

We recognise the indispensability of your personal information and are committed to protecting your privacy and handling your personal information in an open, transparent and secure manner.

This Privacy Policy outlines how we will collect, handle, use, store, share and protect your personal information when you:

We may use your personal data for one or more of the following purposes:

- a) Offering, selling and distributing beverages and related products and services, including drinking water and other beverages, beverages dispensers and accessories, maintenance, repair, after-sales services, replacement and sanitation services, as well as delivery and online sales services;
- b) Processing and implementing your purchase orders; related payment instructions and refund;

- c) Opening, maintenance and administration of your service accounts and records;
- d) Calculating and collecting or paying any amounts owing by or to you;
- e) Communicating with you including handling your requests and enquiries;
- f) Facilitating us in providing and enhancing our products and services, including designing and providing products and services that may better meet your personal preferences and interests;
- g) Making disclosure according to the requirements of any law, regulations, court orders, codes of conduct or guidelines applicable to any member of the Group (Any subsidiaries, holding companies, associated companies, affiliates of, companies controlled by, or under common control with us (collectively, the “Group”));
- h) Marketing and promoting products, services and other subjects (please see further details in section 4.8 below); and
- i) Making a purchase for our products and services;
- j) Engaging with us in relation to employment or experience opportunities at SCCHK, including when you apply for a role with SCCHK or participate in any assessment programme relating to such a role;
- k) Visiting and/or using our website;
- l) Participating in our promotion events, activities, or register as our loyalty program member;
- m) For commercial negotiations with customers/business partners, fulfillment of contracts, financial settlements
- n) Purposes relating to any of the above.

This Privacy Policy covers our online and offline data collection activities, including Personal Information that we collect through various channels, such as websites, applications (apps), applets, e-commerce channels, third-party social networks, points of sale, and events. Please note that we may consolidate personal information collected from different sources (e.g., websites, offline events). Under specific circumstances, we will provide a separated privacy notices, with detailed rationales and purposes that this Privacy Policy does not cover.

2. What Personal Information we collect

There are 4 broad categories of personal information held by us. They comprise of personal information contained in the following:

A. Consumer Data including, but not limited to:-

- (a) Personal Information: full name, contact number, email address, delivery address;
- (b) Feedback after purchasing our products and services;
- (c) Personal interests and preferences.

B. Employee records

- (a) Your personal information including but not limited to full name, National ID / Passport Number, home address, date-of-birth, nationality, sexuality, phone number, and email address;
- (b) Other relevant data including but not limited to financial background, educational background, personal information of spouse and family members, and professional qualification.

C. Customer/Business Partner Data

- (a) Your personal information, which is limited to the primary contact person as the communication channel for business interactions or activities, or for the customer to register an account on our customer portal, including but not limited to full name, contact number, email address, and delivery address.
- (b) Information collected from you about others in situations where you decide to invite a third party to conduct business with SCCHK. We will collect your and third party's names, phone number and email addresses in order to make contact and follow up with the third party.
- (c) SCCHK may collect your identity card, bank card account number when it is used to process orders, provide customer/supplier services or make financial settlements.

D. Sensitive Personal Information

Under specific scenarios, we may also collect “sensitive”, or “special categories” of personal information that are fit for purpose, such as the following:

- (a) Unique Personal Identifier
 - a. Identification Number (HKID),
 - b. Passport Number, and
 - c. Driver's License Number
- (b) Medical and/or Healthcare data
- (c) Personal information revealing the following:
 - a. Financial Data,
 - i. Financial records
 - ii. Credit/Debit card and,
 - iii. Any other form of payment methods and their details
 - b. Trade union membership
- (d) Biometrics features and data,
- (e) Precise Geolocation data,
- (f) Criminal Records

The above-mentioned definition are broad categories that can be found in multiple jurisdiction, under the specific circumstances, we will provide more detail under the

specific privacy notice on the types of sensitive personal information, purpose and subsequent handling requirements that would be expected from us. An explicit consent would also be required if you wish to provide us with the sensitive personal information. If the provision of such sensitive personal information is mandatory for the purpose of collection, we will clearly indicate to you that the provision of this information is mandatory, and the consequences if you choose not to provide the relevant information.

3. How we will collect and use your Personal Information

We will primarily collect personal information directly from you, however, in some cases we may also collect your personal information indirectly from the following sources:

- (a) Recruitment agencies;
- (b) Background check providers;
- (c) Third party service providers that assist us to operate and run our business;
- (d) Publicly available sources such as business and employment-oriented social network services (such as LinkedIn) and jobs boards (such as JobsDB);
- (e) Insurance agencies.
- (f) SCCHK's Affiliates, Subsidiaries, or Business Partners such as Coca-Cola Company Limited.

Such collection from external sources will be notified and stated in the specific privacy notice prior to the engagement and collection from such sources.

We will collect and process your personal information primarily in the following scenarios:

- (g) Placing an order for any of our products or services;
- (h) Handling complaint or refund request;
- (i) Registering as a member online or mobile apps;
- (j) Completing any customer survey or provide feedback for us;
- (k) Submitting employment-related application online or via email and mobile apps;
- (l) Browsing or using our website via your browsers with cookies enabled;
- (m) Participating in our promotion events or activities

4. Purposes of collecting your Personal Information

SCCHK may use your personal information for the following purposes:

A. For personal information collected from the consumer

- (a) To register our loyalty membership, promotion activities such as the lucky draw and other mobile apps, etc;

- (b) To provide our products and services for you, to contact you in relation to logistic arrangements of delivering the products and services to you, and to send you service-related communications;
- (c) To tailor and personalise our products and services to you, to better match your preferences and interests, and to provide or facilitate any special assistance you may have asked for;
- (d) To record and facilitate your payment for purchasing our products and services;
- (e) To carry out your instructions, to respond to your enquiries, and to provide customer services and assistance;
- (f) To notify you about our new products, special offers and other special promotions with your explicit consent;
- (g) To perform investigation, research or statistical analysis in order to improve our products and services, and benefit our customer;
- (h) To ensure safety and security of our consumers, and to undertake any necessary activities during emergency events; or
- (i) To comply with any legal, governmental or regulatory requirements in relevant jurisdiction including but not limited to verifying and processing payment, screening against fraud, screening against abusive purchasing, money laundering and other criminal or unlawful activities.

B. For personal information collected from customer/business partners

- (a) To conduct business activities, to contact you in relation to communicating about the products, services and relevant requests, and maintain the business relationships;
- (b) To process payment instructions;
- (c) To conduct customer surveys; or
- (d) To access customer portal and provide corresponding services.

C. For personal information collected from employees

- (a) To undertake recruitment activities, such as processing your employment application and checking for any existing or potential conflicts of interest or any other restrictions which may otherwise restrict or prevent employment with any entity of SCCHK;
- (b) To undertake matters relating to or in connection with your employment including but not limited to the purposes of payroll, benefit, administration, transfer and other career-related matters such as transfer of employment and secondment, promotion and career development activities;
- (c) To conduct reference check with previous employers; or
- (d) Any other purposes directly or indirectly relating to the compliance by SCCHK or any of the employment or statutory obligations.

D. For personal information collected via our websites and mobile apps/mini programs

- (a) To manage and improve any services provided via our websites and mobile apps/mini programs;

- (b) To manage and improve our websites and mobile apps including drawing up statistics on the usage of our websites and mobile apps/mini programs;
- (c) To tailor the content of our websites and mobile apps/mini programs to provide you with a more personalized experience and draw your attention to information about products and services that may be of interest to you;
- (d) To manage and respond to any request you submit through our websites and mobile apps/mini programs; or
- (e) To help us learn more about you, the products and services that you receive, and other products and services that you might be interested in receiving.

We will notify you when there are any changes to our purpose of collecting your personal information, we might need to re-obtain your consent if there is any alteration beyond the processing purpose as mentioned above.

5. Who we share your Personal information with

To facilitate the purposes mentioned in 4. Purposes of collecting your Personal Information, we may transfer, disclose, grant access to or share your Personal Information under specific scenarios, with third-parties for the following purposes (whether within or outside the country in which you are located):

- (a) Third-party service providers engaged by us to assist with providing you with our products and services;
- (b) Third-party service providers engaged by SCCHK to assist processing your Personal information such as payroll providers, background check providers or recruiters;
- (c) Includes, but is not limited to, SCCHK's direct and indirect subsidiaries, holding companies, and affiliates or related companies as shown in the links below; Other business partners such as website, mobile app and loyalty programme operators;
- (d) Marketing partners who provide marketing services or conduct marketing or social interaction activities including campaigns, contests, sweepstakes, market research, customer surveys and data analytics;
- (e) Credit reference agencies, credit, debit and/or charge card companies and/or banks; or
- (f) Law enforcement agencies, government and regulatory bodies, and other organisations.

Details of such external sharing of personal information would be specified in the individual Privacy Notice(s) or Personal Information Collection Statement(s) prior to your collection. Depending on your region, explicit consent may be required for such processing or sharing to take place.

We may also share aggregated data, provided that your identity will be sanitized and unable to be reidentified, with third parties for the specified purposes, and to better understand your needs to improve our products and services.

As SCCHK cannot control the privacy practices and data protection policies of third parties that are not subject to this Privacy Policy. SCCHK will conduct due diligence such as inclusion of contractual terms in the respective agreements, conduct periodic assessment(s) and audit(s) with such third-parties. When we share your personal information with the respective third-parties, you are also encouraged to read the Privacy Policy of such third-parties.

In the following cases, the collection, use, processing, sharing, transfer and public disclosure of your personal information do not require your prior authorized consent:

- a) Related to national security, national defense security;
- b) Related to public security, public health, public interest;
- c) Related to crime investigation, prosecution, trial and judgment execution;
- d) Out of the maintenance of your or other individuals' lives, property and other important legitimate rights and interests, but it is difficult to get my consent;
- e) Personal information that you have disclosed to the public on your own, or that has been legally disclosed;
- f) Personal information collected from legitimate publicly disclosed information, such as legitimate news reports, government information disclosure and other channels;
- g) Entrusted by us to handle your personal information;
- h) Necessary to maintain the safe and stable operation of the products or services provided, such as the discovery and disposal of product or service malfunctions;
- i) Necessary for legitimate news reporting;
- j) Necessary for an academic research organization to conduct statistical or academic research in the public interest, and to provide the results of academic research or descriptions to the public, and to de-identify the personal information contained in the results; or
- k) In other cases where your authorized consent is not required under applicable law.

We will never use, share, or sell your personal information for purposes other than those stated above (or those stated in our Personal Information Collection Statement at the time of collection) without your consent.

6. Use of Personal information in Personalized Recommendations

We will not use your personal information for marketing and promotional purposes unless we have obtained your explicit and prescribed consent, including but not limited to:

- For sending or showing you updates on latest news, offers and promotions in connection with our products and services
- For sending or showing you joint marketing offers about our products and services; or

- For tailoring and tracking your interactions with advertisements and links from third-party websites to our websites.

You may unsubscribe or opt-out of receiving such direct marketing communications from us by contacting us as set out in 12. Your rights and contacting us.

6.1. Use of Personal Data in Direct Marketing

We are allowed to use your personal data in direct marketing only if we obtained your consent or you do not object. In connection with direct marketing, we intended:

6.1.1. To use your name, contact details including but not limited to telephone number, delivery and email address, customer profiling information, products and services portfolio information and transaction pattern and behaviour collected, compiled, generated or held by us from time to time; and

6.1.2. To market and promote the following classes of products, services and subjects which may be offered by us or any of the Group members or our joint promotion partners:

(a) Beverages and related products and services, including drinking water and other beverages, beverages dispensers and accessories, maintenance, repair, after-sales, replacement and sanitation services, and delivery and online sales services; and

(b) Products and services offered by our Group members or joint promotion partners may include pantry items and related services.

If you are our eShop member and do NOT want your personal data be used for direct marketing, please tick (✓) the box in Member Profile to exercise your opt-out right. You may also write to our At-Work and Home Department at the address below to opt out from direct marketing at any time. Please quote your outlet number which is printed on our invoices.

17-19 Yuen Shun Circuit, Siu Lek Yuen, Shatin N.T. Hong Kong

Swire Coca-Cola HK,

Attention: At-Work and Home Department

7. Use of Cookies on SCCHK websites

SCCHK website will use cookies which, among other things, help us to improve your experience of our websites and to ensure that they perform as you expect them to. For detailed information on how we use cookies and the purposes for which we use them, please see our Cookies Policy.

8. Transmission, storage and security of your Personal Information

We use a range of physical, technical and managerial safeguards to protect your personal information in accordance with the requirements of information protection legislation and ensure that we keep your personal information secure, accurate and up to date. These measures include:

- Education and training to relevant staff to ascertain that they are aware of corporate privacy obligations when handling and processing personal information;
- Administrative and technical controls to restrict access to personal information on a need-to-know and need-to-have basis;
- Technological security measures, including but not limited to firewalls, encryption, data anonymization and anti-virus software; and
- Physical security measures, such as staff security badges to access our premises

Since no system or platform is impenetrable, and no information provided over the Internet is completely secure, therefore we could not guarantee the security of any information you transmit to us or receive from us over the Internet. However, SCCHK will take due care in updating our latest practices to ensure that the most appropriate forms of protection have been instilled.

9. Usage of your Personal Information for Statistical Analysis

We may also use your personal information to analyse our customers' and consumers' preferences to establish market trends and derive insights. This may involve combining personal information that we hold about your purchased records with information that we have collected about your web usage. Similar to 5. *Who we share your Personal Information with*, the aggregated data that are used for statistical analysis are not personally identifiable. In the unfortunate event of a personal information security incident, we will, in accordance with the requirements of local laws and regulations, promptly inform you of: the basic situation and possible impact of the security incident, the disposal measures we have taken or will take, the suggestions you can independently take to prevent and minimize the risk, and the remedial measures for you. We will promptly inform you of the situation related to the incident by email, letter, phone call, push notification, etc. When it is difficult to inform the subject of personal information one by one, we will take a reasonable and effective way to make a public announcement. At the same time, we will also take the initiative to report the handling of personal information security incidents in accordance with the requirements of local regulatory authorities.

10. Retention of your Personal Information

Your personal information will be retained for as long as the purpose(s) for which it was collected and any other permitted associated purpose(s). Our retention periods are based on the the minimum time necessary to achieve the purpose of the authorized use, beyond the above-mentioned period of storage of personal information, your

information will be irreversibly anonymized or securely disposed of once the purpose of collection has been fulfilled, unless it is necessary to extend the retention period with your consent or otherwise in accordance with applicable laws and regulations.

11. How your Personal Information is transferred globally

In principle, personal information collected will be processed, accessed or stored in the country in which you are located or country/region where SCCHK or its affiliates, subsidiaries, service providers or business partners operates or functions at. As we provide our products and services through resources and servers throughout the world, this means that we may export your personal information outside of your country with legitimate reasons. These jurisdictions may have different data protection laws. In such circumstances, SCCHK will take measures to ensure that data is processed as required by this Privacy Policy and applicable laws. We will ensure that all transfers of your personal information will be protected with appropriate security measures.

12. Your rights and contacting us

You control the personal information shared with us, and have the right to exercise any of your entitled Data Subject Rights based on the respective jurisdiction or statutory requirements within the specific region. As such Data Subject Rights differ from different jurisdiction, please refer to the Appendix for more details.

If you wish to exercise any of your Data Subject Rights, please contact us at:

By fax (852-2686-6957 or 852-2686-6903)

In person or by mail (Swire Coca-Cola HK, 17-19 Yuen Shun Circuit, Siu Lek Yuen, Shatin, New Territories, Hong Kong. Attention/Contact: At-Work and Home Department)

Or

Swire Coca-Cola Data Privacy Protection Office

By email (dppo@hk.swirecocacola.com)

SCCHK may request additional personal information from you when responding to such request to ensure the authenticity and validity of such request. We will make every endeavour to ensure that the compliance and response of such request are done within the period set under the statutory requirements within the specific region.

A reasonable amount of fee may also be charged for the processing of any data subject request. You are also entitled to the right for raising complaint(s) about our data processing activities to regulatory bodies in your jurisdiction.

13. Changes to this Privacy Policy

This Privacy Policy does not extend to third-party websites that may be linked from our website, or from any other broadcast affiliated with us.

We may amend this Privacy Policy from time to time. For material changes, we will also provide a more prominent notice (we will indicate the specific changes to the Privacy Policy by means including, but not limited to, email, text message, or a special notice on the page you are viewing).

Material changes within the meaning of this Privacy Policy include, but are not limited to:

- A material change in our service model. Major changes in our service model, such as the purpose of processing personal information, the type of personal information processed, and the way personal information is used;
- Significant changes in our ownership structure, organizational structure, etc.. Such as changes in ownership due to business restructuring, bankruptcy and mergers and acquisitions, etc;
- Changes in the main targets of sharing, transferring or publicly disclosing personal information;
- Significant changes in your rights to participate in the handling of personal information and how you exercise them;
- Changes in the department responsible for handling personal information security, contact information and complaint channels;

SCCHK Privacy Policy – Appendix

This Appendix applies if you are based in the Hong Kong SAR during your interactions with us. We will process your personal information in compliance with applicable laws and regulations. The contents of the Appendix are subject to change in accordance with the applicable laws and regulations.

1.0 Your Data Subject Rights

Please note that your exercise of these rights is subject to limitations and we may reject your request.

- **Access and correction:** You may access the information we maintain about you. You may request access to correct any errors in your personal information.
- **Withdraw:** You may request to withdraw any previously provided consent. We may require you to furnish specific information that would assist us with complying to such request.