

PRIVACY STATEMENT

INTRODUCTION

We know that you care about your personal data and how it is used, and we want you to trust that SBFE uses your personal data carefully.

Please read this privacy notice carefully as it sets out how and why we collect, store, use and share personal data and your rights in relation to your personal data including details of how to contact us and supervisory authorities if you have a complaint.

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1. WHO WE ARE AND HOW TO CONTACT US

Orangina Schweppes Holdings BV (“OSH”) is the Controller of your personal data. OSH is part of Suntory Beverage & Food Europe (“SBFE”), which is the European regional division of Suntory Beverage & Food (“SBF”) Limited and part of the Suntory Group.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share personal data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit. When you click on the link to access any SBFE Affiliates websites, OSH may also share your personal data with that SBFE Affiliates, which is responsible for the SBFE business in the country your interactions with this website relate to. When this happens, the relevant SBFE Affiliate is the Controller of your personal data:

- (i) In **France** the legal entity controlling your personal data is:
 - Orangina Schweppes France SAS
40-52 boulevard du Parc, 92200 Neuilly sur Seine, France.
- (ii) In **Great Britain and the Republic of Ireland** this is:
 - Great Britain: Lucozade Ribena Suntory Limited
2 Longwalk Road, Stockley Park, Uxbridge UB11 1BA, United Kingdom.
 - Republic of Ireland: Lucozade Ribena Suntory Ireland Limited
7th Floor, Chase Building, Carmanhall Road, Sandyford, Dublin, D18 Y3X2, Ireland.
- (iii) In **Spain** the legal entity is:
 - Spain: Schweppes SA
Calle Mahonia 2, 28043, Madrid, Spain.
 - Portugal: Schweppes Portugal Unipessoal Limited for Portugal Quinta da Fonte, R. Malhães nº 5, Ed. Q56, Piso 2, Lisbon, Portugal.
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- (iv) In **EECM-Benelux** the legal entities are:
 - The Netherlands: Orangina Schweppes Holdings BV and Schweppes International Limited
H.J.E. Wenckebachweg 123, 1096 AM Amsterdam, The Netherlands.
 - Poland: Orangina Schweppes Polska Sp.z o.o.
Racing Avenue 6, 02-685 Warsaw, Poland.
 - Belgium: Schweppes Suntory Benelux NV/SA in Belgium
Rue du Cerf 127, 1332 Rixensart, Belgium.

Where we refer to SBFE in this privacy statement we are referring to OSH in the first instance (as administrator of the website on behalf of all SBFE Affiliates s) and the SBFE group entities in the instances your personal data is shared with them.

SBFE and its Affiliates s (also referred in this notice as “SBFE, “we” or “us”) take privacy very seriously and are committed to ensure that you are informed about the manner in which we collect, use and share your personal data.

2. DEFINITIONS

“**Affiliate**” means, with respect to a party, an entity that (directly or indirectly) controls, is controlled by or is under common control with, such party, where control refers to the power to direct or cause the

direction of the management policies of another entity, whether through ownership of voting securities, by contract or otherwise;

“Controller” means the entity which, alone or jointly with others, decides how and why to use your personal data;

“Data Protection Laws” means all applicable laws and regulations relating to the processing of personal data and privacy including, not limited to, the Data Protection Act 2018; the UK General Data Protection Regulation; the EU General Data Protection Regulation; the Privacy and Electronic Communications (EC Directive) Regulations 2003; and the Data Protection (Charges and Information) Regulations 2018;

“Personal Data” means any information about an identified or identifiable individual

“Processing” or **“Process”** means any operation or set of operations which is performed by or on behalf of Supplier as part of the Services upon Personal Data or other SBFE entity Data, whether or not by automatic means, such as collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction;

“Processor” means the entity which Processes Personal Data on behalf of the Controller.

3. SCOPE OF THIS PRIVACY STATEMENT

This privacy notice sets out the conditions under which SBFE will process your personal data:

- (1) When you visit this website (<https://suntorybeverageandfood-europe.com>),
- (2) When you interact with our social media platforms [LinkedIn, Facebook, Twitter, etc],
- (3) When you contact us on through our website, by email or by phone call,
- (4) When you apply for a job through the global careers site in our website,
- (5) When you visit us in any of our physical locations (offices, factories, warehouses, etc),
- (6) When you are our customer,
- (7) When you are a prospective customer,
- (8) When you provide goods or services to us and we need to process your personal data in order to enter into an agreement or contract with you and manage that agreement or contract (Supplier).

4. HOW AND WHY WE PROCESS YOUR PERSONAL DATA

We will only use your personal data where the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- (i) to comply with a *legal or regulatory obligation* for example to respond to data subject access request under Article 15 of the EU GDPR.
- (ii) where it is in our *legitimate interest* or that of a third party such as [insert relevant example]. We will always make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our/ a third party's legitimate interest.
- (iii) *Performance of a contract* to which you are a party or to take steps at your request before entering into such a contract; and

- (iv) *Consent*, you can withdraw your consent at any time by [insert details of how you can withdraw consent] [or by following the opt-out links on any marketing communications sent to you] or by contacting us at GDPR.info@suntory.com.

We will only use your personal data for the purposes for which we collected it, unless we consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to obtain an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at GDPR.info@suntory.com

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

The table below explains the ways in which we use your personal data and the legal basis which is used.

When we process your data	Purpose of processing	Type of personal data	Legal basis
When you interact with our social media platforms	We can use this content in our accounts and your public profile in social media, for marketing campaigns and to generally promote our products and services. We can also process your feedback received in social media in order to improve our products and services.	1. Personal identifiers: first name, family name, email address, phone number. 2. Any information that may be considered personal data and that you choose to share with us through our internet social media accounts.	Our legitimate interest to promote our company's social media platforms and to improve our services and products.
When you contact us on our different communication channels (web contact form, email or phone call)	To manage, track and respond your inquiries and questions, receive your comments and feedback, including general complaints, and/or fulfil your requests	1. Personal identifiers: first name, family name, email address, postal address, phone number, date of birth. 2. The reason for your contact and any additional information that may be considered personal data and that you choose to share with us through our web forms, phone call, postal mail, or on our internet social media accounts.	Our legitimate interest to respond to your communications, provide a good service and resolve general complaints
When you make a data protection request or complaint	To manage, process, track and respond to your data protection requests and/or complaints.	1. Country, category of data subject - employee, consumer, etc-, request type, full name, email, employee ID (if applicable). 2. Request details: any information you want to share with us related to your request and that could be relevant for us when processing your request.	To comply with our legal obligation under Article 15 of the EU GDPR and, in the UK, our legal obligation to investigate and respond to Data Protection complaints under Data Protection Act 2018

When we comply with our legal obligations	To comply when this is required by legal proceedings or public authorities, and we reasonably believe that disclosing your personal data is strictly necessary to comply with those obligations.	Any personal data held to comply with the nature of the legal obligation, to exercise or defence in legal claims, to monitor access to our offices, for quality, safety and health in our establishments, to comply with whistleblowing regulation, etc.	To comply with a legal obligation imposed by domestic law such as a court order requiring the disclosure of personal data
When we need to protect our interests	To lawfully enforce our terms and conditions, protect our operations or those of any of our Affiliate's, protect our rights, privacy, safety, or property, and/or that of our Affiliates s, and allow us to pursue available legal remedies or limit the damages that we may sustain.	All personal data held that may be relevant to a legal matter or business interest.	Our Legitimate interest to protect our business, interests and rights, for example where we make a claim to recover monies owed to us.

Personal data that we collect or generate about you:	Purpose	Type of personal data	Legal basis
When you visit our website - Use of cookies**	To enable our website to function properly and measure your engagement with the website and provide you with content adapted to your interests.	Please refer to our Cookie Policy (link) for full details	Please refer to our Cookie Policy for full details
When we manage our website	For the correct administration, changes or restructuration of this website, to diagnose server problems, to prevent any potential disruptions or cyberattacks on our systems and networks and to update our security solutions.	IP address, device type, software, etc	Our legitimate interest to ensure our website functions correctly to promote our business
When you visit our physical locations (offices, factories, warehouses, etc)	To ensure and preserve the rights and physical integrity of our employees; for product quality assurance; for the assessment of the effectiveness of business operations; for environment, health and safety compliance; and for the prevention and detection of crime.	CCTV images and sound	Our legitimate interests to promote safety and security of our premises and support quality assurance. Also our legal obligation to comply with health & safety regulatory requirements.

When we send you marketing communications	To promote our products, services and relevant offers to you.	Your identity, contact, communication and usage information,	Legitimate interests, to grow our business through marketing. Consent when you have specifically requested marketing information through our website form.
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****We will always ask for your consent before placing and using non-essential cookies to track your behaviour and collect information about you. You can use the 'Manage Cookies' (Section 8 of the Cookie Policy on this website to change your preferences or revoke consent for cookies at any time.**

For more information on how we use cookies, please see our [Cookies Policy](#).

Job applicants

When you click in the Global Career link in our website to apply for a job, you will be redirected to the Suntory Holdings Limited website, and therefore your interactions will be governed by the terms displayed in the referred site. When you apply to a job position in any SBFE Affiliates, you will be provided with the SBFE Privacy Notice relevant for the processing of your personal data in that country or territory.

We may use your personal data to form a view on what we think you may want or need, or what may be of interest. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested marketing communications by completing and submitting the contact form in our website or have engaged in negotiations with us for/purchased products from us and you have not opted out of receiving marketing communications. You can ask us to stop sending you marketing communications at any time by clicking the unsubscribe link in the email received or by exercising your right to object in our contact [web form \[link\]](#).

Children's personal data

We take children's privacy seriously therefore we do not knowingly process children's personal data.

In accordance with best practice and international standards, we do not directly market our products or services to children aged under 16, and we do not show images of children under 16 in marketing communications.

If you become aware that a child under the age of 16, or such other age as may be required by local law, has provided us with personal information without parental consent or in a manner not permitted by applicable law, please contact our Data Protection Officer at GDPR.info@suntory.com

Once we become aware of this, we will take steps to delete the child's personal information as required by applicable law.

In any case, whenever we process your Personal Data, we make sure that this is carried out in compliance with applicable laws and regulations.

We ensure that the Personal Data is only accessed by SBFE employees that have a need to do so for the purposes described in this Privacy Policy and according to our SBFE Access Control Policy.

5. HOW WE SHARE YOUR PERSONAL DATA WITH THIRD PARTIES

SBFE only shares your personal data in the cases and for the purposes listed and described below:

- (i) As a global business, we may share your Personal Data **within the Suntory Group, its subsidiaries and Affiliates** when this is required to achieve any of the purposes described above. When we do this, we ensure that the processing of your data by the Affiliates will be carried out under the conditions described in this Privacy Statement.
- (ii) We may also share your Personal Data with **third parties service providers outside of the group** to operate and maintain our services (see table in Section 4). These third-parties service providers act as our processors for the following purposes. Rest assured that when engaging these third parties, appropriate contractual agreements (Data Processing Agreements) compliant with the GDPR requirements are put in place between us and the third-party provider:
 - 1) With our business partners (for example, this could include our partners from whom you or your company or your organisation purchased our Products. Personal Data will only be transferred to a business partner who is contractually obliged to comply with SBFE data protection standards and the applicable data protection legislation);
 - 2) With third party agents and contractors for the purposes of providing services to us (for example, the SBFE's accountants, professional advisors, IT and communications providers and debt collectors). These third parties will be subject to SBFE data protection standards, internal policies and procedures when processing your personal data, they will only use your Personal Data as described in this Privacy Policy and as expressly instructed by SBFE

For a full list of the third parties currently acting as Processors please click here: [\(Link to external document\)](#)

- (iii) **If we are legally required to disclose your personal data**, for example, to comply with any legal obligation (including, without limitation, in order to comply with tax reporting requirements and disclosures to regulators), or to establish, exercise or defend legal rights;
- (iv) **If we sell our business or assets**, your personal data will be used by us or shared with Suntory Group for internal reasons, primarily for business and operational purposes. As we continue to develop our business, we may sell or purchase assets, subsidiaries or business units. In such transactions, your personal data generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, you consent otherwise).
- (v) **If we are acquired by a third party**, your personal data will be disclosed to such entity as part of the due diligence process and will be transferred to such entity as one of the transferred assets. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such personal data will be considered an asset of ours and as such it is possible they will be sold or transferred to third parties.

5.1 International data transfers

SBFE is part of the Suntory Group, a global company with operations, customers, and partners spread all around the world.

To achieve the purposes described in this privacy notice, we may transfer some of your Personal Data to third parties across international borders. As a result, your Personal Data may be transferred to locations outside of your country.

If your data is transferred to a country or territory located outside the EEA or the UK and therefore not protected by GDPR, we will ensure that your personal data is transferred and processed with the same level of protection as it is the case when processed in the UK and the EEA. This will be done in one of the following ways:

- 1- The country that we send the data to is approved by the European Commission or UK Secretary of State as offering an *adequate level of protection* for Personal Data;
- 2- The recipient of your data in the foreign country might have signed up to a contract which included “standard contractual clauses” (SSCs), approved by the European Commission or UK Secretary of State, obliging them to protect your Personal Data with certain minimum standards;
- 3- By confirming that the recipient of your personal data is located in the United States of America and that it is self-certified under the US Department of Commerce’s ‘EU-U.S. Data Privacy Framework (DPF),’ program for international transfers to entities located in the United States <https://www.dataprivacyframework.gov/list>.
- 4- In other circumstances, EU member state law may permit us to otherwise transfer your Personal Data outside the EEA or UK in certain specific situations.

You can obtain more details of the protection given to your Personal Data when it is transferred outside the EEA and the United Kingdom (including a copy of the standard data protection clauses which we have entered into with the recipients of your Personal Data) by contacting us at GDPR.info@suntory.com.

6. HOW WE SECURE YOUR PERSONAL DATA

SBFE takes all necessary technical and organisational measures to protect the confidentiality, security, and ensure the availability of your Personal Data collected via our digital media. These efforts include but are not necessarily limited to:

- (i) **Technical measures:** We have controls in place to maintain the security of our information and information systems. Files containing personal data are protected with different safeguards according to the sensitivity of the relevant information. Appropriate controls (such as restricted access) are placed on our computer systems. Physical access to areas where Personal Data is gathered, processed or stored is also limited to authorised employees.
- (ii) **Organizational measures:** As a condition of employment, our employees are required to follow internal policies and procedures, and all applicable data protection laws and regulations. Access to sensitive Personal Data is limited to those employees who need it to perform their roles. Unauthorised use or disclosure of confidential SBFE entity information by one of our employees is prohibited and may result in disciplinary measures.
When you contact one of our employees about your file, you may be asked for some Personal Data. This type of safeguard is designed to ensure that only you, or someone authorised by you, has access to your file.
- (iii) **Contractual measures:** All data processors we engage with are subject to an exhaustive selection process and bind to SBFE data protection contractual clauses to ensure the processing of your

personal data remains within our standards of GDPR compliance. Data processors on behalf of SBFE are also contractually obliged to ensure that any sub-processors engaged in the processing will perform its duties within the same required data protection standards.

7. HOW LONG WE KEEP YOUR PERSONAL DATA

By rule, we will keep your data accurate and up to date for as long as we need it for the purposes described in this Privacy Statement. If the processing of your personal data is no longer necessary for any purpose, it will be either irreversibly anonymized (and the anonymized data may be retained), or securely erased.

Exception to this rule is when it is necessary to comply with our legal and regulatory obligations, resolve disputes and enforce our agreements imposing that SBFE must keep your personal data for a longer period after the purpose of the processing was accomplished.

Data type	Retention period
Customers	As a general rule we will keep your personal data for 5 years from the date of the customer contact. We may however be required to keep your personal data for longer in case of a legal claim.
Suppliers	We will retain your personal data in our systems for as long as our contractual relationship lasts. We may however keep your personal data for longer for tax, legal or regulatory purposes.
All website visitors	Please see our cookie notice for details of how long personal data is retained when you visit our website.
Office and all sites visitors (CCTV)	We keep the CCTV footage for 30 days, unless there is a an internal or police investigation taking place and the footage must be retained until the investigation is closed.
Consumers	Consumer inquiries data is retained for 5 years from the inquiry date and deleted or anonymized afterwards. We may however be required to keep your personal data for longer in case of a legal claim.

8. YOUR RIGHTS REGARDING THE PROCESSING OF YOUR PERSONAL DATA AND HOW YOU CAN EXERCISE THEM

In all cases described in Section 4 in which we collect, use or store your Personal Data, you have the following rights, and, in most cases, you can exercise them free of charge.

These rights include:

1- Right of access: the right to request the confirmation whether your Personal Data is being processed by any SBFE Affiliates or not, and to access that personal data;

2- Right to withdraw consent: when the processing of your personal data is legally based on your consent, you have the right to withdraw your consent at any time, without prejudice to the to the validity of the processing

prior to the withdrawal. Please note, however, that we may still be entitled to process your Personal Data if we have another lawful basis for doing so. For example, we may retain Personal Data if we need to comply with a legal obligation. You always have the option not to share any of your Personal Data with us. If you choose this option, you may be limited in the activities and features we can provide you.

3- Right to rectification: the right to request the rectification of your Personal Data if it is inaccurate, outdated or incomplete.

4- Right to erasure: the right to request that we erase your Personal Data if: (i) your Personal Data is no longer necessary for the purpose of the data processing, (ii) you have withdrawn your consent on the data processing based exclusively on such consent, (iii) you objected to the data processing, (iv) the Personal Data processing is unlawful, (v) the Personal Data must be erased to comply with a legal obligation applicable to SBFE.

Please note that there may be circumstances where you ask us to erase your Personal Data, but we are legally obliged or entitled to retain it, in which case we will notify you of this and the reasons why.

5- Right to object: this enables you to object to the processing of your personal data where we are relying on legitimate interest(s) and you object to processing on this ground as you feel the processing impacts your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. You also have the absolute right to object where we are processing your personal data for direct marketing purposes.

6- Right to restrict: the right to temporarily restrict the processing of your personal data carried out by SBFE and any of its Affiliates s: (i) in the event the accuracy of your Personal Data is contested to allow SBFE to check such accuracy, (ii) if you wish to restrict your Personal Data rather than deleting it despite the fact that the processing is unlawful, (iii) if you wish SBFE to keep your Personal Data because you need it for your defence in the context of legal claims (iv) if you have objected to the processing but SBFE conducts verification to check whether it has legitimate grounds for such processing which may override your own rights.

8- Right to data portability: in some circumstances, the right to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to Personal Data which you have provided directly to SBFE.

9- Right to complain: please see the “Questions and Concerns” section below”

You can ask us to stop sending you marketing communications at any time by clicking the unsubscribe link in the email received or by exercising your right to object in our contact web form [link].

You can exercise any of your above rights by completing this [web form](#).

As soon as you submit this form our Data Protection Team will contact you and start working on your request. You will be able to access your request and the related conversation exchange in the Privacy Portal for the duration of your request and up to 30 days after its closure,

When logging into the Privacy Portal you can select to be remembered by the system for 60 days so that you don't have to log in every time you access the Portal.

Before we can process your request, we may need information from you to help us confirm your identity. This is a security measure to ensure that rights are being exercised by the correct person and to ensure that personal data is not disclosed to, erased by or altered by any person who has no right to do so.

9. QUESTIONS AND CONCERNS

There may be times when we don't get it right, and, if so, we want you to let us know. We take complaints very seriously and aim to learn from them to improve our standards of service and data protection controls.

You can contact us to make a complaint using our [web form](#).

We will acknowledge your complaint within 30 days of receiving it.

We may ask for information to check your identity and if someone is making a complaint on your behalf we will also need to check that the person making the complaint is allowed to do so. If we are unable to identify you / verify the authority of the person making the complaint, we may not be able deal with it.

We will consider your complaint without undue delay and keep you/your authorised representative updated at appropriate intervals on the progress of our investigation.

We may need to ask you for further information or documents. If so, we will ask you to provide the information within a specific period of time so that we can respond to your complaint within a reasonable time frame.

We are usually able to answer privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive, you can contact your relevant Data Protection Authority in your country.

If you are resident of the EU, you can also contact the **Autoriteit Persoonsgegevens in the Netherlands**, which is our lead supervisory authority for all our business in the EU.

Contact details of the Supervisory Authorities relevant to SBFE:

- (i) Belgium Autorité de la protection des données / Gegevensbeschermingsautoriteit (APD-GBA): www.autoriteprotectiondonnees.be / www.gegevensbeschermingsautoriteit.be
- (ii) Ireland Data Protection Commission: www.dataprotection.ie
- (iii) France Commission Nationale de l'Informatique et des Libertés (CNIL): www.cnil.fr
- (iv) Netherlands Autoriteit Persoonsgegevens: www.autoriteitpersoonsgegevens.nl
- (v) Poland Urząd Ochrony Danych Osobowych (Personal Data Protection Office): www.uodo.gov.pl
- (vi) Portugal Comissão Nacional de Proteção de Dados (CNPd): www.cnpd.pt
- (vii) Spain Agencia Española de Protección de Datos (AEPD): www.aepd.es
- (viii) United Kingdom Information Commissioner's Office (ICO): www.ico.org.uk
- (ix) Luxembourg CNPD: <https://cnpd.public.lu/en.html>

10. PRIVACY STATEMENT UPDATES

If you have any further questions or concerns about this Privacy Statement, please contact our Data Protection Officer using the following email address: GDPR.Info@suntory.com

We will update this Privacy Statement when necessary to reflect customer feedback, system updates, and changes in our products and services. When we post changes to this statement, we will revise the “last updated” date at the top of this document. If the changes are significant, we will provide a more detailed notice (including, for certain services, email notification of Privacy Statement changes). We will also keep prior versions of this notice in an archive for your review.

This Privacy Statement was last updated on **01 August 2026**.