

EMPLOYEE PRIVACY POLICY

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Petra Maričová Financial Director	Paul Simon Barnett Managing Director	Stanislav Frank In-house lawyer	10.04. 2018 / 25.05.2018
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Employee Privacy Policy

Overview

This is an Asahi group-wide Employee Privacy Policy that applies to, and is issued by, Asahi Brands Europe a.s., with registered seat at Kopeckého sady 329/8, Vnitřní Město, 301 00 Plzeň, Czech Republic, ID No. 29115779 ('Asahi', 'our', 'us' or 'we'), a member of the Asahi group of companies, the ultimate holding company of which is Asahi Group Holdings, Ltd., headquartered at 23-1 Azumabashi, 1-chome, Sumida-ku, Tokyo, 130-8602 Japan. If an Asahi group company to which this Privacy Policy applies, is based in the European Union ("EU"), this Privacy Policy applies to all personal data that it processes in the context of the employment, prospective employment, internship or prospective internship of all employees, prospective employees, interns, prospective interns and internal contractors.

If an Asahi group company to which this Privacy Policy applies is based outside of the EU, this Privacy Policy applies only to the personal data that it processes that relates to the monitoring of the behaviour of employees in the EU.

The Asahi group companies that this Privacy Policy applies to are set out in Annex 1 of our Personal Data Protection and Handling Policy ([HERE]).

References to the EU also include the additional territories of the EEA (namely Iceland, Norway and Liechtenstein) from the date on which the General Data Protection Regulation 2016 ("GDPR") is incorporated into the EEA Agreement.

This Privacy Policy describes:

- what personal data we collect about our EU-based employees, potential employees, interns, prospective interns and internal contractors;
- how we use and otherwise process that information;
- the basis upon which we process it;
- with whom it is shared; and
- how it is stored.

This policy also describes other important topics relating to this information and its privacy.

This policy is issued in English and translated into Czech and the languages of countries in which we operate via our locally registered branches. In the event of discrepancy between the various language versions, the English version shall prevail.

Please read this Privacy Policy carefully to understand how we handle your personal data.

The Policy is comprised of the following Sections:

Section 1: Data collection

Section 2: Use of data

Section 3: Legal bases for use of your personal data

Section 4: Disclosure of personal data

Section 5: Retention of personal data

Section 6: Your rights

Section 7: Transfers of data

Section 8: Security

Section 9: Third party websites

Section 10: Changes to our Privacy Policy

Section 11: Further questions or making a complaint

1. Data collection

1.1 We may collect and use any of the following information about you and we refer to this as "**personal data**" throughout this policy (the scope and the categories of the processed data may vary in every individual case dependant on the situation and on the subject of the data):

(a) Your personal details:

(i) your full name (including first name, maiden name and surname);

- (ii) birth date;
 - (iii) home address;
 - (iv) proof of identification and address;
 - (v) birth number;
 - (vi) nationality;
 - (vii) home telephone number;
 - (viii) personal email address;
 - (ix) gender;
 - (x) marital status;
 - (xi) drivers licence and vehicle licence details;
 - (xii) details of character and physical description; and
 - (xiii) leisure activities and interests.
- (b) Your family/next of kin details:
- (i) emergency contact information;
 - (ii) spouse or civil partner name;
 - (iii) spouse or civil partner contact information;
 - (iv) spouse's or civil partner's birth number
 - (v) names of dependents and children; and
 - (vi) co-insured family members details and beneficiaries of your life insurance or other benefits.
- (c) Documentation required under immigration laws:
- (i) citizenship details;
 - (ii) national identification number;
 - (iii) other documents required to show your right to live in your current country and to work for your employer there; and
 - (iv) details required for residency, work permit and/or visa processes.
- (d) Compensation/employment information:
- (i) current/former titles and positions held with us (and information about that position, including how long in position, supervisor, location of position, employee identification number, promotions, training records, overall work history, languages spoken, disciplinary actions, grievances, retirement eligibility, transfers);
 - (ii) identification search results, including employment searches, directorship searches, bankruptcy searches, media searches and criminal record checks;
 - (iii) current and historic compensation with Asahi (base salary, bonus, pension contributions);
 - (iv) work contact information (phone number, postal address, mailing address, email address);
 - (v) performance reviews and information (including career forecasts and development plans);
 - (vi) work place accident information, drug and alcohol testing information, sickness and other absence information and medical or health information (relevant to your employment and/or provided by you to Asahi, that means , medical assessments from company doctor and occupational health reports);
 - (vii) work hours (overtime and shift work, hours worked and department standard hours);
 - (viii) previous employment references;
 - (ix) your photo (including for relevant access control systems);
 - (x) travel bookings and other expense claims, records and information; and

- (xi) written, electronic and phone communications in the scope permitted by the law.
 - (e) Payroll data:
 - (i) bank details;
 - (ii) working time records;
 - (iii) current compensation; tax information; and
 - (iv) IDs related to payroll processing.
 - (f) System and application access data: information required to access company systems and applications (such as system ID).
 - (g) Talent management/resume/CV information: details contained in an application and resume/CV or otherwise provided to us, including previous employment background, professional qualifications, references, career development and skills analysis, training, departmental changes, performance and calibration details. We also collect psychometric testing and personality profiling data. However, we do not use this data to make any automated decisions about you.
 - (h) Management records: details of any shares of common stock or directorships that you may hold.
 - (i) CCTV (Closed-Circuit Television = camera monitoring system) footage, once or if CCTV system is installed in the company premises.
- 1.2 Source of personal data. We may receive some information about you directly from you. However, we may also receive some of this personal data from third parties, such as recruitment agencies, your former employer and public agencies, as well as group companies. We may also collect this personal data from publicly-available sources, such as LinkedIn.
- 1.3 Special categories of data: Some of the personal data that we collect about you or which you provide to us about you, your family and benefit beneficiaries may be special categories of data. "Special categories of data" are personal data that relate to any of the following: racial or ethnic origin; political opinions; religious, philosophical or similar beliefs; any trade union membership; physical or mental health; biometric data (potentially including photos where used for identification purposes); sexual life or orientation; criminal convictions or offences (actual or alleged). (For clarity, "special categories of data" were previously known as, and are still sometimes called "sensitive personal data".)

2. Use of data

Use of your personal data

2.1 We may collect, use and store your personal data for the following reasons:

- (a) to operate, support and centralise human resources administration and management (including but not limited to recruitment, payroll administration, employee administration, learning management, performance management and review, data storage, expense reporting and benefits management and termination of your employment);
- (b) to enable you to do your job;
- (c) candidate profiling and suitability assessment;
- (d) health and safety records and management;
- (e) occupational health;
- (f) security vetting, criminal records checks, credit checks and clearances (where applicable and allowed by law);
- (g) confirming information on resumes, CVs and covering letters, providing reference letters and performance reference checks;
- (h) staff management and promotions;
- (i) monitoring employee communication and internet usage for the purpose of ensuring that our rules are being complied with and for legitimate business purposes, in accordance with our IT Security and Acceptable Use Policy;
- (j) equal opportunities monitoring;
- (k) provision of staff information to customers, agencies and suppliers in the course of the provision of our services;

- (l) taxation and registrations for employees working outside the country where they are based;
- (m) CCTV monitoring and other security of company facilities;
- (n) ensuring adequate insurance coverage for our business;
- (o) compliance with any procedures, laws and regulations which apply to us;
- (p) establishing, exercising or defending our legal rights; and
- (q) otherwise, for the lawful operation of our business.

Use of your family and next of kin information

- 2.2 Separately, we may process personal data about your family and next of kin for the purposes of provision of benefits and tax discounts and so that we may contact them in an emergency. If you disclose information about your family in written, electronic or phone communications, we may also have access to this information on our systems.

Other uses

- 2.3 We will only process your or your family/next of kin's personal data for the specific purposes listed above or for any other purposes specifically permitted by law. If we wish to process your personal data for any other purpose, we will update this Privacy Policy in accordance with section 10.

3. Legal bases for use of your personal data

- 3.1 We need to have legal bases for using your personal data for the purposes set out in this Privacy Policy. We consider that our legal bases are as follows:

- (a) our use of your personal data is necessary for the performance of our obligations under our contract with you (for example, to pay you or to confer a benefit under the terms of an employment contract); or
- (b) our use of your personal data is necessary for complying with our legal obligations, particularly as your employer (or prospective employer) (for example, providing your personal data to HMRC); or
- (c) where neither (a) nor (b) apply, it is necessary for the purposes of our legitimate interests or the legitimate interests of a third party (for example, to ensure a safe working environment, to ensure the reliability of our employees or to maintain adequate personnel records).

- 3.2 Where we are relying on our legitimate interests or the legitimate interests of a third party, we have explained, in the relevant parts of this Privacy Policy, what those legitimate interests are.

- 3.3 Where we collect and process special categories of data (for example, information for drug and alcohol testing, any health assessment or criminal background checks) then we will only process such information:

- (a) where we reasonably need to do so in order to comply with our legal obligations as an employer or to exercise specific rights that we have as an employer; or
- (b) where you have given us your explicit consent.

- 3.4 If we have asked for your consent to collect and use certain types of personal data, you may withdraw your consent at any time, by contacting your local human resources representative.

4. Disclosure of personal data

Disclosure to Asahi group companies

- 4.1 Your business contact information will be made available to other Asahi employees, temporary staff and contractors, interns and prospective interns and with customers, agencies and suppliers in the course of providing our services. This information includes your name, position, workplace telephone numbers, work addresses and email addresses, employee department, employee job title, employee photo and miscellaneous position details.

- 4.2 Your personal data may be shared with any company that is a member of our group, which includes our ultimate parent company based in Japan, where we consider that it is in our legitimate interests to do so for internal administrative purposes, corporate strategy, auditing and monitoring and research and development.

- 4.3 We may also share your personal data with our group companies where they provide products and services to us, such as information technology systems, human resources services and employee monitoring.

4.4 Our group companies outside of the EU may also process your personal data that they receive from us (such as system and application access data and logs) for the purpose of monitoring your behaviour, either as an additional data controller or as a data processor.

4.5 Access to your personal data is limited to those employees who need to know the personal data, and may include your managers and their designees, as well as employees in the human resources, corporate services, legal, information technology, and finance departments.

Disclosure to third parties

4.6 We will share your personal data with the following categories of third parties:

- (a) other parties such as legal and regulatory authorities, accountants, auditors, lawyers and other outside professional advisors; and
- (b) companies that provide products and services to us, such as:
 - (i) payroll and benefits providers;
 - (ii) pension providers;
 - (iii) insurance companies, including those providing medical insurance and group income protection;
 - (iv) human resources services, such as pre-employment checks and for employee monitoring;
 - (v) recruitment agencies;
 - (vi) parties requesting an employment reference;
 - (vii) travel agencies and transport providers;
 - (viii) occupational health assessment providers and medical professionals undertaking drug and alcohol testing;
 - (ix) information technology systems suppliers and support, including email archiving, telecommunication suppliers, back-up and disaster recovery and cyber security services; psychometric testing providers and other outsourcing providers, such as off-site storage providers and cloud services providers.

4.7 We will also disclose your personal data to third parties:

- (a) where it is in our legitimate interests to do so to run, grow and develop our business:
 - (i) if we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets;
 - (ii) if Asahi or substantially all of its assets are acquired by a third party, in which case personal data held by Asahi will be one of the transferred assets;
- (b) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
- (c) to enforce our contract with you, to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- (d) to protect the rights, property or safety of Asahi, our employees, customers, suppliers or other persons.

4.8 Some of these companies (including our group companies) may use your data in countries which are outside of the EU. Please see section 7 below for more detail on this aspect.

Restrictions on use of personal data by recipients

4.9 Any third parties with whom we share your personal data are limited (by law and by contract) in their ability to use your personal data for the specific purposes identified by us. We will always ensure that any third parties with whom we share your personal data are subject to privacy and security obligations consistent with this Privacy Policy and applicable laws.

4.10 Save as expressly detailed above, we will never share, sell or rent any of your personal data to any third party without notifying you and/or obtaining your consent. Where you have given your consent for us to use your information in a particular way, but later change your mind, you should contact us and we will stop doing so.

5. Retention of personal data

- 5.1 Asahi collects and maintains personal data on current, former and prospective employees, interns, prospective interns and internal contractors for legitimate corporate business purposes, such as processing payroll, collecting CVs/resumes to fill vacant positions, and maintaining accurate benefits records.
- 5.2 We keep your personal data for no longer than necessary for the purposes for which the personal data is used or otherwise processed. The length of time we retain personal data depends on the purposes for which we collect and use it and / or as required to comply with applicable laws. For example, in the CZ, wage sheets or accounting records of data required for pension insurance purposes must be kept for thirty years.
- 5.3 We currently store personal data for as long as required or permitted by law or for as long as we reasonably consider necessary to establish, exercise or defend our legal rights, including.
- Further information on the length of time during which we retain your personal data can be found in our Data Retention and Information Handling Policy.

6. Your rights

- 6.1 You have certain rights in relation to your personal data. If you would like further information in relation to these or would like to exercise any one of them, please contact your local human resources representative. You have the right to request that we:
- (a) provide access to any personal data which we hold about you;
 - (b) update any of your personal data which is out of date or incorrect;
 - (c) delete any personal data which we hold about you;
 - (d) restrict the way that we process your personal data;
 - (e) do not provide your personal data to a third party provider of services;
 - (f) provide you with a copy of any personal data which we hold about you; or
 - (g) consider any valid objections which you have to our use of your personal data.
- 6.2 We will consider all such requests and provide our response within a reasonable period (and in any event any time period required by law). Please note, however, that certain personal data may be exempt from such requests in certain circumstances.
- 6.3 If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.
- 6.4 If you have any questions or concerns about our use of your personal data, please contact your local HR representative.

7. Transfers of data

- 7.1 The personal data may be processed by staff operating outside the EEA working for us, other members of our group or third party data processors for the purposes mentioned in section 2 nad. Further details on to whom your personal data may be disclosed are set out in section 4 nad.
- 7.2 If we provide any personal data about you to any such non-EEA members of our group or third party data processors, we will take appropriate measures to ensure that the recipient protects your personal data adequately in accordance with this Privacy Policy. These measures include, but are not limited to:
- (a) in the case of US based service providers, entering into European Commission approved standard contractual arrangements with them, or ensuring they have signed up to the EU-US Privacy Shield (see further <https://www.privacyshield.gov/welcome>); or
 - (b) in the case of service providers based in other countries outside the EEA (including Japan), entering into European Commission approved standard contractual arrangements with them.
- 7.3 Further details on the steps we take to protect your personal data in these cases is available from us on request by contacting your local HR representative at any time.

8. Security

- 8.1 Asahi is committed to protecting personal data from loss, misuse, disclosure, alteration, unavailability, unauthorised access and destruction and takes all reasonable precautions to safeguard the confidentiality of personal data, including through use of appropriate organisational and technical measures. Organisational measures include physical access controls to our premises, staff training and locking

physical files in filing cabinets. Technical measures include use of encryption, passwords for access to our systems and use of anti-virus software.

- 8.2 In the course of provision of your personal data to us, your personal data may be transferred over the internet. Although we make every effort to protect the personal data which you provide to us, the transmission of information between you and us over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal data transmitted to us over the internet and that any such transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access to it.
- 8.3 Where we have given you (or where you have chosen) a password which enables you to access our systems or any portal or account, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

9. **Third party websites**

You may, from time to time, during your employment or internship, access links to or other websites operated by third parties (e.g. training providers, industry news sources and bulletins). Please note that this Privacy Policy only applies to the personal data that we (or third parties on our behalf or our group companies) collect from or about you and we cannot be responsible for personal data collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal data to these websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third party websites or third party terms and conditions or policies.

10. **Changes to our Privacy Policy**

This Privacy Policy does not form part of any employee's contract of employment or contract with an intern or internal contractor and we may amend it from time to time. Any changes we make to our Privacy Policy in the future will be duly communicated to all employees and published as usual. Please check back frequently to see any updates or changes to our Privacy Policy.

11. **Further questions or making a complaint**

- 11.1 If you have any queries or complaints about our collection, use or storage of your personal data, or if you wish to exercise any of your rights in relation to your personal data, please contact your local human resources representative. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal data.
- 11.2 You may also make a complaint to your local data protection authority in the EU country where we are based or where we monitor your behaviour. If you are unsure which data protection authority to contact, please contact your local human resources representative who will advise you. Alternatively, you may seek a remedy through local courts if you believe your rights have been breached.

The practices described in this Privacy Policy statement are current personal data protection policies, as of 25 May 2018.