

WEBSITE PRIVACY STATEMENT

PRIVACY STATEMENT

This document applies to <https://minus196.co.uk/>. Please read this privacy statement carefully as it sets out how and why we collect, store, use and share personal data generally, as well as your rights in relation to your personal data and details of how to contact us and supervisory authorities if you have a complaint.

- 1 [BACKGROUND](#)
- 2 [THE PRODUCTS AND SERVICES WE PROVIDE](#)
- 3 [THE TYPES OF PERSONAL DATA WE COLLECT](#)
- 4 [HOW WE USE YOUR INFORMATION](#)
- 5 [DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES](#)
- 6 [INTERNATIONAL TRANSFERS OF PERSONAL DATA](#)
- 7 [HOW WE SAFEGUARD YOUR INFORMATION](#)
- 8 [HOW LONG WE KEEP YOUR PERSONAL DATA](#)
- 9 [YOUR RIGHTS](#)
- 10 [QUESTIONS AND CONCERNS](#)

1. BACKGROUND

Suntory Beverage & Food Europe ("SBFE") is the European regional division of Suntory Beverage & Food Limited and part of the Suntory Group. This website is operated by Lucozade Ribena Suntory Limited ("LRS"), which is part of SBFE and a subsidiary of Suntory Beverage & Food Limited. LRS is the data controller of personal data collected through the website. LRS may share your personal data with the Suntory Beverage & Food Limited subsidiary within SBFE that is responsible for the SBFE business in the country your interactions with this website relate to, when this happens they will become a data controller of your personal data. In 'FRANCE' the legal entity that will control your personal data is Orangina Schweppes France SAS; in 'GB&I' this is Lucozade Ribena Suntory Limited in Great Britain and Lucozade Ribena Suntory Ireland Limited in Ireland; in 'SPAIN' the legal entity is Schweppes SA for Spain and Schweppes Portugal Unipessoal Limited for Portugal; and in 'EECM-BENELUX', the legal entity is Schweppes International Limited for the Netherlands, Orangina Schweppes Polska Sp.z o.o. in Poland, and Schweppes Suntory Benelux NV/SA. In Belgium. Where we refer to SBFE in this privacy statement we are referring to LRS in the first instance and the SBFE group entities in the instances your personal data is shared with them.

In this privacy statement the term "Personal Data" means any data which relates to a living individual who can be identified from that data or from that data and other information which is in the possession of, or is likely to come into the possession of SBFE (or its representatives or service providers). In addition to factual information, it includes any expression of opinion about an individual and any indication of the intentions of SBFE or any other person in respect of an individual.

2. THE PRODUCTS AND SERVICES WE PROVIDE

- (i) This Privacy Policy concerns the following categories of information that we collect about you when providing the following products and services:
 1. Information we receive through our websites.
 2. Information we receive through our activities.
 3. Information we receive through the manufacture and the sale of our products.

3. THE TYPES OF PERSONAL DATA WE COLLECT

- (i) Many of the activities of SBFE require us to obtain Personal Data about you in order to perform the services or obligations we have been engaged to provide. In relation to each of the activities, we will collect and process the following Personal Data about you:

1. Information that you provide to us

This includes information about you that you provide to us. The kind of Personal Data we might ask for, may include (by way of a non-exhaustive list):

- Basic Personal Data (such as first name; family name; position in the SBFE; SBFE email address; business phone number; business address; city; postcode; country).
- Any information that you choose to share on our Internet forums which may be considered Personal Data.

2. Information that we collect or generate about you

This includes (by way of non-exhaustive list):

- A file with your contact history to be used for enquiry purposes so that we may ensure that you are satisfied with the services which we have provided to you.
- Activity data relating to the use of protected documents, such as altering a document's permissions and information regarding the individual that performed the activity.

3. Cookies

- We use cookies to enable our websites to function properly (essential cookies). Additionally, we would like to use cookies to collect technical information about the services you use and how you use them (non-essential cookies).
- We will always ask for your consent before using non-essential cookies and you can use the Manage Cookies section on the website to change your preferences or revoke consent at any time.
- For more information on how we use cookies, please see our Cookies Policy.

4. Anonymized data

In addition to the categories of Personal Data described above, we will also process further anonymized information and data that is not processed by reference to a specific individual.

5. Children

We take children's privacy protection seriously. We operate this website in compliance with all applicable laws in the countries in which we operate business.

SBFE is not responsible for cases in which minor persons have sent all personal data through this website.

4. HOW WE USE YOUR INFORMATION

- (i) Your Personal Data may be stored and processed by us in the following ways and for the following purposes:

1. for ongoing review and improvement of the information provided on our websites to ensure they are user friendly and to prevent any potential disruptions or cyber-attacks;

2. to set up customers for our business;
 3. for statistical monitoring and analysis of current attacks on devices and systems and for the on-going adaptation of the solutions provided to secure devices and systems against current attacks;
 4. to understand feedback on our Products or Services and to help provide more information on the use of those Products and Services quickly and easily;
 5. to communicate with you in order to provide you with services or information about our business, SBFE and our Products;
 6. to understand your needs and interests;
 7. in order to comply with and in order to assess compliance with applicable laws, rules and regulations, and internal policies and procedures; or
 8. for the administration and maintenance of databases storing Personal Data.
- (ii) However when we use Personal Data we make sure that the usage complies with applicable law and regulations and the law and regulations allow us and require us to use Personal Data for a variety of reasons. These include:
1. we need to do so in order to perform our contractual obligations with customers;
 2. we have obtained your consent;
 3. we have legal and regulatory obligations that we have to discharge;
 4. we may need to do so in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
 5. the use of your Personal Data as described is necessary for our legitimate business interests, such as:
 - allowing us to effectively and efficiently manage and administer the operation of our business;
 - maintaining compliance with internal policies and procedures;
 - monitoring the use of our copyrighted materials;
 - enabling quick and easy access to information about SBFE, our business and our Products;
 - offering optimal, up-to-date security solutions for mobile devices and IT systems; and
 - obtaining further knowledge of current threats to network security in order to update our security solutions.
- (iii) We will take steps to ensure that the Personal Data is accessed only by employees of our SBFE that have a need to do so for the purposes described in this Privacy Policy.

5. DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES

- (i) We may share your Personal Data within the Suntory group of companies for the purposes described above.
- (ii) We may also share your Personal Data outside of the Suntory group for the following purposes:
 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 appropriate data protection obligations and the relevant privacy and confidentiality 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 appropriate data protection obligations and they will only use your Personal Data as described in this Privacy Policy;
 3. to the extent required by law and regulations, for example if we are under a duty to disclose your Personal Data in order 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 its legal rights;
4. if we sell our business or assets, in which case we may need to disclose your Personal Data to the prospective buyer for due diligence purposes; and
 5. if we are acquired by a third party, in which case the Personal Data held by us about you will be disclosed to the third party buyer.

6. INTERNATIONAL TRANSFERS OF PERSONAL DATA

- (i) SBFE is a global business. Our customers and our operations are spread around the world. As a result we collect and transfer Personal Data on a global basis. That means that we may transfer your Personal Data to locations outside of your country.
- (ii) Where we transfer your Personal Data to another country outside the EEA or the UK, we will ensure that it is protected and transferred in a manner consistent with legal requirements. This may be done in one of the following ways:
 1. the country that we send the data to might be approved by the European Commission or UK Secretary of State as offering an adequate level of protection for Personal Data;
 2. the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission or UK Secretary of State, obliging them to protect your Personal Data; or
 3. in other circumstances the law may permit us to otherwise transfer your Personal Data outside the EEA or UK.
- (iii) You can obtain more details of the protection given to your Personal Data when it is transferred outside Europe (including a copy of the standard data protection clauses which we have entered into with recipients of your Personal Data) by contacting us as described in paragraph 10 below.

7. HOW WE SAFEGUARD YOUR INFORMATION

- (i) We have controls in place to maintain the security of our information and information systems. Client files are protected with 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 limited to authorised employees.
- (ii) As a condition of employment, our employees are required to follow all applicable laws and regulations, including in relation to data protection law. 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.
- (iii) 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.

8. HOW LONG WE KEEP YOUR PERSONAL DATA

- (i) How long we will hold your Personal Data for will vary and will be determined by the following criteria:
 1. the purpose for which we are using it, for instance the duration of your contract with us – we will need to keep the data for as long as is necessary for that purpose; and
 2. legal obligations – laws or regulations may set a minimum period for which we have to keep your Personal Data.

9. YOUR RIGHTS

- (i) In all the above cases in which we collect, use or store your Personal Data, you may have the following rights and, in most cases, you can exercise them free of charge.

These rights include:

1. the right to obtain information regarding the processing of your Personal Data and access to the Personal Data which we hold about you;
2. the right to withdraw your consent to the processing of your Personal Data at any time where we are relying on your consent to process your Personal Data. Please note, however, that we may still be entitled to process your Personal Data if we have another legitimate reason for doing so. For example, we may need to retain Personal Data to comply with a legal obligation;
3. 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;
4. the right to request that we rectify your Personal Data if it is inaccurate or incomplete;
5. the right to request that we erase your Personal Data in certain circumstances. Please note that there may be circumstances where you ask us to erase your Personal Data but we are legally entitled to retain it;
6. the right to object to, or request that we restrict, our processing of your Personal Data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your Personal Data but we are legally entitled to refuse that request; and
7. the right to lodge a complaint with the relevant data protection regulator if you think that any of your rights have been infringed by us.

- (ii) You can exercise your rights by contacting us using the details listed in paragraph 10 below.

10. QUESTIONS AND CONCERNS

If you have any questions or concerns about us handling of your Personal Data, or about this Privacy Statement, please contact our Data Protection Officer using the following contact information:

Email Address: GDPR.Info@suntory.com

We are usually able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive you can also contact the **UK Information Commissioner** ([Information Commissioner's Office \(ICO\)](#)) in relation to handling of your personal data by Lucozade Ribena Suntory Limited.

If your concern relates to the handling of your personal data by one of SBFE's businesses in the EU, you can contact your relevant EU data protection regulatory authority in your country, or the **Autoriteit Persoonsgegevens in the Netherlands** ([Home | Autoriteit Persoonsgegevens](#)), which is our lead supervisory authority for all our business in the EU.