

Information on the Processing and Protection of Personal Data

pursuant to Articles 13 and 14 General Data Protection Regulation (GDPR)

for (potential) Customers, Suppliers and Interested Parties

Version: April 2025

The protection of your personal data is a key priority for us. We process your data responsibly, transparently, and in accordance with the *General Data Protection Regulation (GDPR)*, the *Austrian Data Protection Act (DSG)* and, where applicable, the *Telecommunications Act (TKG)*.

This information explains how we process your personal data as our **direct customer or supplier**, but also how we, under certain circumstances, process data of our **"indirect" customers** (who purchase our products not directly from us but via our beverage partners, but may be co-serviced by our field sales team), as well as our marketing activities.

This information applies equally to individuals and companies interested in a business relationship with us (**potential customers and suppliers**) or who have registered for our marketing communications (**interested parties**).

For a quick overview, please read **Section A**. Detailed information can be found in **Section B**.

A. At a Glance

A.1. *Who is responsible for your data?*

Coca-Cola HBC Austria GmbH
Clemens-Holzmeister-Straße 6
1100 Vienna

A.2. *Who can you contact with questions about data protection?*

Contact Form: <https://at.coca-colahellenic.com/en/contact-us>

Group Data Protection Officer: Mr. Nassos Stylianos, DataProtectionOffice@cchellenic.com

A.3. *What types of data do we process about you?*

We mainly process data necessary for our business relationship and, if you consent or we have a legitimate interest, for marketing purposes. This typically includes:

- ▶ **Master Data:** Name of your company, contact person (name, function), address, contact details (phone, email), company registration number, VAT ID number.
- ▶ **Contract Data:** Details on orders, deliveries, services, terms and conditions, contract numbers, purchase volume.
- ▶ **Financial Data:** Bank details, invoice data, payment terms, reminder data, creditworthiness information (if required).
- ▶ **Sales Data** (Indirect Customers): Product-related sales quantities and volumes per location (without prices), purchased via our beverage partners.

- ▶ **Communication Data:** Correspondence (emails, notes), data from platform usage (e.g., supplier portal).
- ▶ **Marketing Data:** Newsletter subscriptions/cancellations of subscriptions, consent status, survey participation, feedback.
- ▶ *For details, see Section B.3.*

A.4. Why do we process your data (Purposes & Legal Bases)?

- ▶ To fulfil our **contracts** with you (*Art. 6(1)(b) GDPR*): e.g., processing orders, deliveries, payments.
- ▶ To fulfil **legal obligations** (*Art. 6(1)(c) GDPR*): e.g., retention of invoices according to tax law (*Sec. 132 BAO, Sec. 212 UGB*).
- ▶ Based on your **consent** (*Art. 6(1)(a) GDPR*): e.g., for sending newsletters, for personalized advertising, or for optional contact after surveys (in compliance with *Sec. 174 TKG* for electronic mail).
- ▶ Based on our **legitimate interests** (*Art. 6(1)(f) GDPR*): e.g., for efficient communication with contact persons, for checking creditworthiness to minimize risks, for conducting customer satisfaction surveys to improve our services, processing sales data of indirect customers (for market analysis, service improvement, strategy development), for optimizing internal processes, or for legal enforcement. We always ensure that our interests do not unduly affect your rights.
- ▶ *For details, see Section B.3.*

A.5. Who do we share your data with (Recipients)?

We only share your data when necessary and based on a legal ground. Recipients may include:

- ▶ **Within the Coca-Cola HBC Group:** e.g., service companies (like Coca-Cola Hellenic Business Service Organization EOOD, Bulgaria) to support internal processes or the parent company (Coca-Cola HBC AG, Switzerland - for aggregated survey data).
- ▶ **Service Providers** (potentially as Processors): e.g., IT providers (like SAP, Domino Design IT-Solutions, Customer Gauge, Asseco Business Solution S.A.), logistics companies, banks, factoring providers, debt collection agencies, credit reference agencies (KSV1870), marketing & event agencies (like AFT Plus, KESCH, Maxfive), printing houses, other service providers (Sirvis GmbH).
- ▶ **Beverage Partners** (Wholesalers, Cash & Carry): May receive reports and analyses based on sales data.
- ▶ **Authorities, Courts, and other Public Bodies:** If we are legally obliged to do so (e.g., tax office, Statistics Austria) or for legal enforcement.
- ▶ **Other Third Parties:** e.g., insurance companies (in case of insured events), auditors, legal advisors.
- ▶ **Third-Country Transfers:** In certain cases, data may be transferred to countries outside the EU/EEA. We ensure that appropriate safeguards (e.g., EU Standard Contractual Clauses, adequacy decision of the European Commission) are in place for this.
- ▶ *For details, see Section B.3.*

A.6. How long do we store your data?

We store your data only as long as necessary for the purpose for which it was collected:

- ▶ During the **term of our business relationship**.
- ▶ Beyond that, according to **statutory retention periods** (e.g., 7 years for accounting records).
- ▶ As long as necessary for the establishment, exercise, or defense of **legal claims** (usually 3 years after the end of the business relationship, longer in individual cases).
- ▶ Data from customer satisfaction surveys: Max. 18 months after participation.
- ▶ Data for marketing purposes (based on consent): Until you **withdraw** your **consent**.

- ▶ Sales data of indirect customers: For analysis periods (3 years), then deletion/anonymization.
- ▶ *For details, see Section B.3.*

A.7. *What are your rights regarding your data?*

You have the right to:

- ▶ **Access** your data processed by us.
- ▶ **Rectification** of inaccurate data.
- ▶ **Erasure** of your data (under certain conditions).
- ▶ **Restriction of processing** (under certain conditions).
- ▶ **Data portability** (receive your data in a machine-readable format, where technically feasible).
- ▶ **Object to the processing** of your data if it is based on our legitimate interest. You can object to direct marketing at any time.
- ▶ **Withdraw** previously given **consent** (if applicable) for the future.
- ▶ *For details, see Section B.4.*

A.8. *Where can you lodge a complaint?*

If you believe that we are not processing your data correctly, please contact us or our Data Protection Officer first. However, you also have the right to lodge a complaint with the Austrian Data Protection Authority:

Österreichische Datenschutzbehörde

Barichgasse 40-42, 1030 Vienna

For details, see Section B.5.

B. Detailed Information on Data Processing

B.1. Detailed Information on Data Processing

The **controller** responsible for processing your personal data is:

Coca-Cola HBC Austria GmbH

Clemens-Holzmeister-Straße 6

1100 Vienna

Austria

For questions about data protection or to exercise your rights, please use the contact form at <https://at.coca-colahellenic.com/en/contact-us> or contact our **Group Data Protection Officer**, Mr. Nassos Stylianos, at DataProtectionOffice@cchellenic.com.

B.2. Principles of Data Processing

Personal data means any information relating to an identified or identifiable natural person (e.g., name, email address of a contact person). We process your data according to the *GDPR* principles: lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, and integrity and confidentiality. For electronic communications, we also comply with the requirements of the *Telecommunications Act (TKG)*, particularly *Sec. 174 TKG* regarding consent for electronic advertising.

B.3. Processing Activities in Detail

We process your data in the context of various activities:

B.3.1. Customer & Supplier Management, Payment Management

Purposes:

Management of master data, handling the entire business relationship, managing payments, accounts receivable management, fulfilling accounting and tax obligations.

Processed Data Categories:

- ▶ **Master Data:** Company name, legal form, address, contact details (phone, email), contact person (name, function, contact details), company registration number, VAT ID/tax number, customer number, supplier number, bank details.
- ▶ **Contract & Financial Data:** Invoice data (number, date, amount, description of service), order data, delivery data, payment terms, conditions, reminder data, account balance lists, bank statements, potentially creditworthiness information (see *Section B.6.*).
- ▶ **Communication Data:** Correspondence, notes on the business relationship.

Legal Bases:

- ▶ **Performance of a contract** / steps prior to entering into a contract (*Art. 6(1)(b) GDPR*): For all data necessary to conduct the business relationship (delivery, service, payment).
- ▶ **Legal obligation** (*Art. 6(1)(c) GDPR*): Particularly for data relevant to accounting and tax (*Sec. 132 BAO, Sec. 212 UGB*).
- ▶ **Legitimate interest** (*Art. 6(1)(f) GDPR*):
 - Processing contact details of contact persons: Our interest in efficient and direct communication for contract execution outweighs the interests of the contact persons.
 - Obtaining credit reports (via KSV1870): Our interest in minimizing payment default risks, especially with new customers or high order volumes, prevails.
 - Internal evaluations (profitability, reporting): Our interest in managing and optimizing our business operations.
 - Establishment, exercise or defense of legal claims: Our interest in enforcing our rights or defending against claims.

Recipients / Categories of Recipients:

- ▶ **Internal:** Responsible departments (Sales, Procurement, Accounting, Logistics), group-internal service providers (e.g., Coca-Cola Hellenic Business Service Organization EOOD, Bulgaria for accounting support - processor according to Art. 28 GDPR).
- ▶ **External:** Banks (payment processing), tax advisors/auditors, IT service providers (hosting, software maintenance - as processors), postal/logistics service providers, factoring providers, debt collection agencies (in case of payment default), credit reference agencies (KSV1870), insurance companies (in case of damage), courts, authorities and other public bodies (tax office, Statistics Austria), lawyers (in case of legal disputes).

Third-Country Transfers:

Generally, **no transfer** to third countries takes place unless explicitly stated otherwise. If it does, it is exclusively based on appropriate safeguards (e.g., Standard Contractual Clauses, adequacy decision of the EU Commission).

Storage Period:

- ▶ **Master Data:** Duration of the business relationship + 3 years (limitation period for claims).
- ▶ **Contract/Financial Data:** At least 7 years according to *Sec. 132 BAO / Sec. 212 UGB*.
- ▶ **Creditworthiness Data:** Only as long as relevant for risk assessment.
- ▶ **Data for Legal Claims:** Until final clarification/expiry of limitation period.

Necessity of Provision:

The provision of master, contract, and financial data is necessary for concluding and performing the business relationship. Without this data, we cannot enter into or maintain a business relationship.

Automated Decision-Making/Profiling:

Does **not** take place.

B.3.2. Order Management

Purposes:

Acceptance, processing, and handling of goods orders, delivery requests, and returns; ensuring efficient goods delivery and customer service.

Processed Data Categories:

- ▶ **Master Data:** Customer number, delivery address, billing address, contact person for order/delivery.
- ▶ **Order Data:** Order date/time ordered products (type, quantity, volume), individual conditions/discounts, delivery dates/times, order number.
- ▶ **Logistics Data:** Delivery status, return information, potentially data on placed cooling equipment.

Legal Bases:

- ▶ **Performance of a contract (Art. 6(1)(b) GDPR):** For processing orders and deliveries.
- ▶ **Legitimate interest (Art. 6(1)(f) GDPR):**
 - Processing contact person data for operational handling: Our interest in smooth ordering and delivery.
 - Storing order data for customer service and analysis (e.g., optimizing delivery routes): Our interest in efficient processes and good customer service.

Recipients / Categories of Recipients:

- ▶ **Internal:** Sales, Logistics, Customer Service, IT, group-internal service providers (e.g., Coca-Cola Hellenic BSO as processor).
- ▶ **External:** Logistics partners (freight forwarders - as processors or separate controllers, depending on the contract), IT service providers (order platforms, ERP system - as processors), other service providers (Sirvis GmbH).

Third-Country Transfers:

No transfer of personal data is intended. If it occurs, it is exclusively based on appropriate safeguards (e.g., Standard Contractual Clauses, adequacy decision of the EU Commission).

Storage Period:

- ▶ **Order-related data:** At least 7 years (as part of accounting records).
- ▶ **Contact person data:** Duration of the business relationship or as long as the person is the contact person + potentially 3 years for follow-up.

Necessity of Provision:

Order data is **necessary** for contract performance.

Automated Decision-Making/Profiling:

Does **not** take place.

B.3.3. Purchasing and Procurement (Suppliers)

Purposes:

Organization and handling of tenders, supplier selection and registration, contract conclusion, management of the supplier relationship, ensuring compliance requirements.

Processed Data Categories:

- ▶ **Master Data:** Supplier name, address, contact details, contact person, company registration data, VAT ID number, bank details, supplier category.
- ▶ **Tender/Offer Data:** Data on participation in tenders (via platform or directly), offer contents (service, price, conditions), communication protocols, feedback meetings.
- ▶ **Compliance/Qualification Data:** Username/password for platform, log-in data, certifications (e.g., EcoVadis), non-disclosure agreements, performance evaluation data.

Legal Bases:

- ▶ Steps prior to entering into a contract / **Performance of a contract** (*Art. 6(1)(b) GDPR*): For data necessary for conducting the procurement process and the supply contract.
- ▶ **Legitimate interest** (*Art. 6(1)(f) GDPR*):
 - Use of an IT platform (e.g., SAP Ariba) for efficiency increase and transparency in the tendering process: Our interest in a standardized, traceable, and efficient procurement system.
 - Conducting supplier evaluations and compliance checks (e.g., via EcoVadis): Our interest in ensuring quality, ethical, and sustainability standards in our supply chain and compliance with internal guidelines.
 - Processing contact person data: Our interest in efficient communication.
- ▶ **Legal obligation** (*Art. 6(1)(c) GDPR*): Potentially for documentation obligations in the context of public contracts or specific compliance requirements.

Recipients / Categories of Recipients:

- ▶ **Internal:** Procurement, responsible departments, Compliance, IT, group-internal service providers (e.g., Coca-Cola Hellenic BSO, CCB Management Services GmbH, Coca-Cola HBC Sourcing B.V. - partly processors, partly joint responsibility depending on the process).
- ▶ **External:** IT service providers for procurement platforms (e.g., SAP Deutschland SE & Co. KG; SAP America, Inc. - see Third-Country Transfer), service providers for supplier evaluation (e.g., EcoVadis SAS, France - as processor), potentially authorities, auditors, legal advisors.

Third-Party Transfers:

USA: When using services of SAP America, Inc. (e.g., for the Ariba platform), personal data (e.g., login data, offer data of contact persons) is transferred to the USA. This transfer is based on EU Standard Contractual Clauses pursuant to *Art. 46(2)(c) GDPR*, supplemented by appropriate technical and organizational measures, which we have assessed as part of a transfer impact assessment to ensure an adequate level of protection.

Storage Period:

- ▶ **Offer/Tender Data:** According to internal guidelines and for traceability, often 5 years after conclusion of the process.
- ▶ **Contract-relevant Data:** At least 7 years (accounting).
- ▶ **Registration Data:** Duration of the supplier relationship + potentially 3 years.

Necessity of Provision:

Providing data for registration on platforms or participation in tenders is often a **prerequisite** for a business relationship in procurement.

Automated Decision-Making/Profiling:

Does **not** take place.

B.3.4. Sending Electronic Advertising (e.g., Newsletter)

Purposes:

Providing information about news, products, offers, and activities of CCHBCA via email.

Processed Data Categories:

Salutation, first name, last name, email address, date and status of consent (incl. withdrawal), dispatch times.

Legal Basis:

Consent (*Art. 6(1)(a) GDPR*) in conjunction with *Sec. 174 TKG*. Consent can be withdrawn at any time.

Recipients / Categories of Recipients:

- ▶ **Internal:** Marketing department.
- ▶ **External:** IT service provider for newsletter dispatch (e.g., Domino Design IT-Solutions Richard Platzer, Graz - as processor according to Art. 28 GDPR).

Third-Country Transfers:

Does **not** take place for this activity.

Storage Period:

Until you **withdraw** your **consent**. After withdrawal, the data for this purpose will be deleted immediately.

Necessity of Provision:

Voluntary. Without consent, we cannot send you electronic advertising. This has no impact on the other business relationship.

Automated Decision-Making/Profiling:

Does **not** take place.

B.3.5. Conducting Customer Satisfaction Surveys

Purposes:

Measuring and analyzing customer satisfaction to improve our products, services, and processes; deriving action plans. Potentially contacting you to discuss feedback (only with separate consent).

Processed Data Categories:

Company name, customer number, name/function/contact details of the contact person, correspondence language, classification (Retail, HoReCa etc.), information on used products/volume, participation metadata (date, time), responses (incl. free text).

Legal Bases:

- ▶ **Legitimate interest** (*Art. 6(1)(f) GDPR*): Our interest in improving our services and customer relationship by obtaining feedback. We assume this is also in the interest of our customers and does not unduly affect their rights. You can object to this processing at any time.
- ▶ **Consent** (*Art. 6(1)(a) GDPR*): For any direct contact by us to discuss your feedback after the survey.

Recipients / Categories of Recipients:

- ▶ **Internal:** Responsible departments (e.g., Sales, Marketing, Quality Management) for analysis and action planning.
- ▶ **External:**

- Service provider for the technical execution of the survey (e.g., Customer Gauge / Directness B.V., Netherlands - as processor according to Art. 28 GDPR).
- Coca-Cola HBC AG, Switzerland (Parent Company): Transfer of mainly aggregated analysis results for group-wide improvement.

Third-Country Transfers:

No transfer of personal data is intended. If it occurs, it is exclusively based on appropriate safeguards (e.g., Standard Contractual Clauses, adequacy decision of the EU Commission).

Storage Period:

Maximum **18 months** after participation in the survey.

Necessity of Provision:

Voluntary. Non-participation has no negative consequences.

Automated Decision-Making/Profiling:

Does **not** take place.

B.3.6. Other Marketing Activities (Personalized Advertising/Offers)

Purposes:

Sending advertising information and offers tailored to your needs and purchasing behavior via post or telephone (if contact details are available and no objection has been made) or via email (only with consent); adapting the marketing strategy.

Processed Data Categories:

First name, last name, telephone number, email address, postal address, usual purchase volume/order history.

Legal Bases:

- ▶ **Consent** (Art. 6(1)(a) GDPR): Especially for personalized offers via email or if personalization goes beyond standard analyses. Consent can be withdrawn at any time.
- ▶ **Legitimate interest** (Art. 6(1)(f) GDPR): Potentially for postal advertising or basic analysis of purchasing behavior to optimize offers, as long as no objection has been raised.

Recipients / Categories of Recipients:

- ▶ **Internal:** Marketing, Sales.
- ▶ **External:** Service providers for operational support in marketing campaigns or analyses (e.g., AFT Plus Promotion Sales GmbH, KESCH Event & Promotions Sales GmbH, Maxfive GmbH, Domino Design IT-Solutions, Sven Fuchs; as well as potentially other specialized service providers for individual campaigns - potentially as processors according to Art. 28 GDPR).

Third-Country Transfers:

Generally does **not** take place for this activity, unless a commissioned service provider uses sub-processors in third countries.

Storage Period:

- ▶ When processing based on consent: Until **withdrawal of consent**.
- ▶ When processing based on legitimate interest: **As long as the interest exists** and no objection has been raised, respecting general storage periods.

Necessity of Provision:

Voluntary. Not giving consent or objecting only prevents the sending of personalized advertising but has no effect on receiving products/services.

Automated Decision-Making/Profiling:

Apart from personalization based on purchase volume for broad segmentation purposes, no profiling takes place.

No automated decisions with legal or similarly significant effects occur.

B.3.7. Processing of Indirect Customer Data (within the scope of Data Sharing with Beverage Partners)

Who is affected (Data Subjects)?

Customers who purchase our products not directly from us but via our beverage partners (e.g., wholesalers, Cash & Carry markets), but may be co-served by our field sales team ("**indirect customers**").

Purposes:

We process this data to pursue our legitimate interests:

- ▶ **Market Analysis & Strategy:** Conducting trend analyses, optimizing inventory management, creating forecasts and demand predictions, supporting the listing of new or optimizing existing products, defining sales strategies, increasing revenue, measuring the success of sales activities.
- ▶ **Cooperation with Beverage Partners:** Segmentation and evaluation of beverage partners, verifying compliance with contractual or legal requirements by partners (e.g., age limits), analyzing and increasing distribution levels, developing joint market strategies with partners, creating reports and analyses for beverage partners.
- ▶ **Improving the Indirect Customer Experience:** Enhancing customer loyalty and customer service (e.g., acting as a contact point for complaints to ensure equal treatment with direct customers), preparing customer meetings (by our sales staff), increasing customer satisfaction, conducting customer analyses and segmentations for customer-oriented marketing and product information, carrying out targeted advertising measures, supporting with transfer orders.

Processed Data Categories:

- ▶ **Master Data of the Indirect Customer:** Company name, customer identification number assigned by the partner, business address (incl. postal code).
- ▶ **Sales Data per Product & Indirect Customer:** Sales channel used ("Channel"), item number, description, group, packaging type, unit, sales quantity (pieces/liters) per location, monthly/annual sales volume, comparative volume to the previous year's month. Important: These datasets do not contain price information.

Legal Basis:

Legitimate interest (Art. 6(1)(f) GDPR). Our interests lie in optimizing our products, logistics, and sales strategies through a better understanding of the end market, supporting our partners, ensuring consistent customer service also for indirect customers, and complying with legal requirements. We have conducted a balancing test and concluded that these interests do not disproportionately affect the rights and freedoms of indirect customers, because a) the data is primarily used for internal analysis and service purposes, b) it is business data, c) no sensitive data or price information is included, and d) transparency and the right to object are ensured.

You can object to this processing at any time pursuant to *Art. 21 GDPR* (see *Section B.4.*).

Source of Data (Art. 14 GDPR):

The data is provided to us not directly by the indirect customer, but by the respective beverage partner (Wholesaler, Cash & Carry) from whom the indirect customer purchases the goods. The beverage partners, in turn, ensure the data protection-compliant collection and transfer of the data to us.

Information Obligation pursuant to Art. 14 GDPR:

As we obtain this data not directly from you as an indirect customer but via our partners, we fulfill our information obligation under Art. 14 GDPR through this public privacy information. Providing individual notification to each indirect customer would constitute a disproportionate effort given the large number of data subjects and the nature of data collection via beverage partners (within the meaning of Art. 14(5)(b) GDPR). However, we take appropriate measures to protect your rights and freedoms as well as your legitimate interests by making all information required under Art. 14 GDPR transparently available in this statement (particularly in this section and Section B.6.).

Recipients / Categories of Recipients:

- ▶ **Internal:** Responsible departments (especially Sales, Marketing), group-internal service providers (e.g., Coca-Cola Hellenic Business Service Organization EOOD, Sofia, Bulgaria for data processing and analysis - processor according to Art. 28 GDPR).
- ▶ **External:** IT service providers for data processing and analysis tools (e.g., Asseco Business Solution S.A., Lublin, Poland - as processor according to Art. 28 GDPR). Beverage partners may receive aggregated or pseudonymized reports.

Third-Country Transfers:

No transfer of personal data is intended for this specific processing activity. If it occurs otherwise, it is exclusively based on appropriate safeguards (e.g., Standard Contractual Clauses, adequacy decision of the EU Commission).

Storage Period:

Detailed sales data is stored for trend analysis and strategic planning purposes for a period of **3 years** and then deleted or irreversibly anonymized. Master data is stored as long as necessary for the stated service and analysis purposes or as long as an active relationship with the indirect customer exists.

Necessity of Provision:

Processing this data is important for us to achieve the purposes mentioned above, especially service parity and market analysis. Indirect customers are under **no obligation** to provide this data to us.

Automated Decision-Making/Profiling:

Customer segmentations based on sales data may be carried out, e.g., to target marketing measures more effectively or adapt sales strategies. **No automated decisions** are made that produce legal effects concerning the indirect customer or similarly significantly affect them.

B.4. Your Rights as a Data Subject

Regarding your personal data processed by us, you have the following **rights**:

Right of Access (Art. 15 GDPR):

You can request information at any time about what data we store about you, for what purposes, to whom we disclose it, how long we store it, and where it originates from.

Right to Rectification (Art. 16 GDPR):

If your data is inaccurate or incomplete, you can request its correction or completion.

Right to Erasure ('Right to be Forgotten') (Art. 17 GDPR):

You can request the deletion of your data if the purpose of processing no longer exists, you withdraw consent (if applicable), you have objected (see below), the processing was unlawful, or there is a legal obligation to delete. However, statutory retention obligations take precedence.

Right to Restriction of Processing (Art. 18 GDPR):

Under certain circumstances (e.g., if you contest the accuracy of the data while we verify it), you can request that we restrict the processing of your data (e.g., only for the establishment, exercise or defense of legal claims).

Right to Data Portability (Art. 20 GDPR):

You have the right to receive data that you have provided to us and which we process automatically based on your consent or for the performance of a contract, in a structured, commonly used and machine-readable format, or to have it transmitted to another controller where technically feasible.

Right to Object (Art. 21 GDPR):

If we process your data to protect our legitimate interests (Art. 6(1)(f) GDPR), you can object at any time on grounds relating to your particular situation. We will then no longer process the data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, or the processing serves the establishment, exercise or defense of legal claims. We will comply with an objection to processing for direct marketing purposes at any time and without requiring justification.

Right to Withdraw Consent (Art. 7(3) GDPR):

If we process data based on your consent, you can withdraw this consent at any time informally (e.g., via email to DataProtectionOffice@cchellenic.com) with future effect. The lawfulness of the processing carried out before the withdrawal remains unaffected.

To exercise your rights, please use the contact form at <https://at.coca-colahellenic.com/en/contact-us> or contact the address mentioned in *Section B.1*.

B.5. Right to Lodge a Complaint with a Supervisory Authority

If you believe that the processing of your data violates data protection law or that your data protection rights have been infringed in any other way, you have the right to lodge a complaint with the competent supervisory authority. In Austria, this is the:

Österreichische Datenschutzbehörde

Barichgasse 40-42
1030 Vienna

Phone: +43 1 52 152-0

Email: dsb@dsb.gv.at

Website: www.dsb.gv.at

Without prejudice to any other administrative or judicial remedy.

B.6. Source of Data (if not collected directly from you - Art. 14 GDPR)

We generally collect your data directly from you (or your company) within the scope of the business relationship. In individual cases, we may obtain data from other sources:

Credit Reports:

To check creditworthiness, we may obtain information from credit reference agencies such as KSV1870 Forderungsmanagement GmbH (Wagenseilgasse 7, 1120 Vienna). This is done based on our **legitimate interest**

(Art. 6(1)(f) GDPR) to minimize financial risks. Typically, name, address, and information on payment behavior or insolvency status are processed.

Publicly Accessible Sources:

e.g., Company Register, Trade Register to verify master data (Basis: **Legitimate interest**, Art. 6(1)(f) GDPR).

Business Partners (for Marketing)

For marketing purposes (see *Section B.3.6.*), we may also receive contact details from business partners, provided you have given the respective business partner separate consent for the transfer of your data to us for this purpose (Basis: **Consent**, Art. 6(1)(a) GDPR).

Beverage Partners (Wholesalers, Cash & Carry - for Indirect Customer Sales Data):

Within the scope of data sharing with our beverage partners, we receive sales data of indirect customers from them: As described in *Section B.3.7.* (Basis: **Legitimate interest** for our processing after transfer by the partner).

B.7. Updates to this Privacy Information

We reserve the right to adapt this privacy information if necessary, e.g., due to changes in the legal situation or our processing procedures. The current version can always be found on our website or requested via the email address mentioned in *Section B.1.* This version is valid from the date stated above or from its publication on our website.