

Privacy Policy

Art 13 and 14 GDPR for Customers and Suppliers

The protection of your personal data is of particular concern to us. With this data protection declaration, we inform you about how we process your personal data in the course of the processing of our business relationship. We attach great importance to the protection, accuracy and integrity of your personal data.

All data will be stored and used in compliance with the provisions of the National Data Protection Act (DSG), the European General Data Protection Regulation (GDPR) as well as all other legal provisions, each in the current version.

If you have any questions regarding the use of your data, please contact us at DataProtectionOffice@cchellenic.com.

I) Controller

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

Email: DataProtectionOffice@cchellenic.com

II) GENERAL INFORMATION ON DATA PROCESSING

Personal data are all data that contains information about personal or factual circumstances, such as name, address, e-mail address, telephone number, date of birth, age, gender, etc.

We collect, process and store your personal data as part of the processing of our business relationship. These are generally processed and stored to the extent that this is necessary for the fulfilment of the contractual or legal obligations under Art 6 (1) lit b and c GDPR. "Sensitive" data may also be affected, in particular with regard to criminally relevant behaviour under Art 10 GDPR, in particular for the assertion, exercise or defence of legal claims in the context of the contractual relationship or operation of our website. If the processing is necessary to safeguard our legitimate interests or a third party and this interest does not outweigh your interest in secrecy, we shall base the processing of your personal data on the basis of Art 6 sec. 1 lit f GDPR. We delete or store your personal data protected from access as soon as the purpose of the processing ceases, provided that we as the controller have not been obliged to store the data

beyond the period of performance of the purpose. Furthermore, we reserve the right to store your personal data for as long as concrete legal claims are made against us.

We reserve the right to amend this Privacy Policy at any time in compliance with the applicable data protection regulations.

III) PROCESSING ACTIVITIES

In the following we inform you in detail in particular about the scope and purpose of the processing of the data as well as about the transmission of your data to third parties.

1. Customer management and payment management

1.1. Scope of data processing

The processing of personal data of our suppliers and customers as well as their clerks is required for the organisation and thus handling of our payment management, including the recording of incoming and out-of-payments. Specifically, the following data is processed:

- *Business partner:*
 - (i) Name, first name, title, gender, address and contact details, company register data, VAT number, date of accounting, date of first and second reminder, data on tax liability and calculation, payment order data, payment method details, information on conditions, currency, customer number, invoice number, subject matter of delivery or service, customs clearance data, data on the insurance of the delivery or service, data on payment or performance, account and receipt data, credit card number and company, financing and payment terms, credit management data, account and receipt data, bank details, details of the invoice, including description of the performance or service, account number, order number, order number and invoice number,
 - (ii) details of authorisations, details of approvals, correspondence language, information on the business relationship, information on the supplier/customer group, if applicable number of the debt collection number, blocking number, dunning data or claim data, service-specific expenses and income, contact person(s) for the

processing of the delivery and service, third parties involved in the provision of services, indication of whether claim has been assigned, indication of status (active/closed), indication of further measures in the event of insolvency, indication of whether a business relationship is still maintained,

(iii) creditworthiness data

- *Clerk at the business partner*

name, first name, salutation, title, gender, assignment to company, assignment to department, function in the company, position, contact details, correspondence language, set activities, indication of the date and time of the activities, indication of approvals, information on authorizations, free text box for commenting;

1.2. Purpose of data processing

The purpose of the present processing is to manage and keep up-to-date the data of the customer and suppliers on an IT-based basis, as well as to enable the smooth and well-documented execution of business relationships and the systematic recording of all business transactions relating to outstanding receivables/payables. Furthermore, the aforementioned data is processed for the purpose of settling outstanding receivables/payables.

1.3. Legal basis for data processing

- We process the personal data of our business partners (point a) mentioned in (i) on the basis of the (pre-)contractual measures in accordance with Art. 6 (1) lit b GDPR in order to process the business relationship smoothly and thus to be able to fulfil our contractual obligations at all times. No criminally relevant data under Art 10 GDPR as well as personal data of a special category under Art 9 GDPR will be processed, unless this is necessary in the context of the assertion, exercise and/or defence of legal claims under Art 6 (1) lit b GDPR iVm Art 9 (2) lit f GDPR in the event of abusive conduct.

Failure to provide the required data means that we are unable to enter into a business relationship with you.

- Due to our legitimate interest under Art 6 (1) lit f GDPR, we process the data referred to in (ii) and in point (b) ("business partner clerk") in a smooth and effective settlement of the business relationship and uncomplicated communication with the relevant clerks.

You can object at any time to the processing of your personal data in accordance with Art 21 GDPR, stating reasons. Please send your

revocation **to**
DataProtectionOffice@cchellenic.com.

- We receive the credit worth data in (iii) from KSV 1870 Forderungsmanagement GmbH Wagenseilgasse 7, 1120 Vienna and we process them in the event of an event on the basis of our legitimate interest in accordance with Art 6 (1) lit f GDPR. It is in our legitimate interest, in particular our new business partners, where necessary, to check for their creditworthiness and, if necessary, to take appropriate measures.

You can object at any time to the processing of your personal data in accordance with Art 21 GDPR, stating reasons. Please send your revocation **to**
DataProtectionOffice@cchellenic.com.

1.4. Recipients of the data

- (i) In order to process payment transactions and thus to fulfil contractual obligations under Art 6 (1) lit b GDPR, we transmit your data to the following recipients:
 - Banks for the settlement of payment collection companies for debt collection (therefore only abroad if the debt has to be collected abroad).
 - Debt financiers such as leasing or factoring companies and assignees, provided that the supply or service is thus externally financed.
 - Contract or business partners who are to participate in or are to participate in the delivery or service.
 - Group companies with suppliers as well as commercial customers and large customers.
 - Insurance on the occasion of the conclusion of an insurance contract for the delivery/performance or the occurrence of the insured event.
- (ii) In addition, as a company, we are subject to legal obligations to forward personal data. In accordance with Art 6 (1) lit c GDPR, we transmit your data to the following recipients:
 - Competent administrative authorities, in other countries Tax authorities;
 - Courts (including [federal] administrative courts in their own affairs) on the basis of legal obligations;

- Federal Institute "Statistics Austria" for the compilation of statutory (official) statistics;
 - Insurance on the occasion of the occurrence of an insured event and legal obligations;
 - Register of economic Property (WiEReG)
 - Tax consultants and auditors.
- (iii) For the purpose of verifying the creditworthiness of our business partners, we transfer your personal data to KSV1870 Forderungsmanagement GmbH due to our legitimate interest in accordance with Art 6 (1) lit f GDPR.
- (iv) Furthermore, we reserve the right to forward the data collected for this purpose to the competent authorities and courts as well as to our legal representation and insurance and to all other recipients required in individual cases if there are reasonable grounds for abusive behaviour. This is due to our legitimate interest in proper legal proceedings under Art 6 (1) lit f GDPR.
- (v) In order to be able to design the contract initiation and contract execution and thus our service always smoothly and effectively, we are adding Coca-Cola Hellenic Business Service Organization EOOD (BSO), 8 Racho Petkov Kazandzhivata str. 1715 Sofia, Bulgaria as a service provider. The latter may have access to your personal data and is contractually obliged under Art 28 GDPR to always uphold the protection of your personal data, to take appropriate technical and organisational measures with regard to the security of the data and in no way to process or forward your data to third parties for its own purposes.

In the course of this processing activity, no transfer of your personal data to third countries will take place.

1.5. Duration of storage

In principle, personal data will be stored until the end of the business relationship. However, we are obliged to keep tax-relevant data in accordance with Section 132 BAO and business letters in accordance with Section 212 UGB for a period of at least seven years. In addition, the data will be retained for as long as we have to make specific claims against us or if we need them to assert our legal interests. If we have reasonable grounds for suspecting abusive behaviour or if we need this data to enforce our claims or defend our interests, we forward the data to the relevant public authorities and store this data on a separate medium. After the legal proceedings have ended, this data is deleted. If you have any questions about the specific

retention period of your personal data, please contact us at DataProtectionOffice@cchellenic.com.

1.6. Further processing of data

The data processed for this purpose will be processed internally for the purposes of the processing of the business relationship, for example for the calculation of conditions and profitability, for the implementation of our quality and complaint management, the planning and implementation of our logistics, the vending, the planning of marketing measures and further corporate communication, the planning of our external service sets as well as for the purposes of accounting.

For questions and to receive detailed information, to what extent and on what legal basis we process your data for this purpose, please contact DataProtectionOffice@cchellenic.com.

1.7. Automated decision-making

The data processed in the course of this processing activity is neither processed for automated decision-making nor does we carry out the so-called "profiling".

2. **Ordermanagement**

2.1. Scope of data processing

In order to ensure the smooth handling of goods orders and delivery requirements as well as returns and to be able to effectively carry out the support of customers, we process the following data:

- *Customer*
Name, first name, title, gender, address and contact details, company register data, VAT number, ATU number, contact details, bank details, customer number, correspondence language, billing address, delivery address, date and time of order, order details (type, brand, container, volume, number and quantities, packaging type), details of individual discounts and conditions, if applicable date of delivery, if applicable date of the invoice, if applicable invoice number, if applicable due date of the invoice, if applicable amount of the invoice, if applicable information on opening or delivery times, if applicable, indication of placed and still to be placed cooling units, free text field for comments.
- *Clerk at the customer*
name, first name, salutation, title, gender, assignment to company, assignment to department, function in the company, position,

contact details, correspondence language, set activities, indication of the date and time of the activities, indication of approvals, information on authorizations, free text box for commenting.

2.2. Purpose of data processing

The purpose of the present processing is to be able to efficiently organise the acceptance of orders, any complaints, the delivery and return of goods, and to ensure smooth and efficient customer care. Furthermore, the processing serves the purpose of being able to react in good time to any changes, such as a change in the delivery date. Furthermore, it is necessary for this purpose to have correct and current customer master data and to update this in the event of any changes.

2.3 Legal basis for data processing

- We process the personal data of our customers on the basis of the (pre-)contractual measures in accordance with Art 6 (1) lit b GDPR in order to handle the acceptance and processing of the order smoothly and thus to be able to fulfil our contractual obligations at all times. Furthermore, we process data that is not absolutely necessary to fulfil our contractual obligations in our interests under Art 6 (1) lit f GDPR, in order to enable a rapid order processing and thus to act to your satisfaction. In addition, no criminally relevant data under Art 10 GDPR as well as personal data of a special category under Art 9 GDPR are processed, unless this is necessary in the context of the assertion, exercise and/or defence of legal claims under Art 6 (1) lit b GDPR iVm Art 9 abs 2 lit f GDPR in the event of abusive conduct.

Failure to provide the required data means that we are unable to enter into a business relationship with you.

- We process the personal data of the clerks at the customer's on the basis of our legitimate interest pursuant to Art 6 (1) lit f GDPR in a smooth and effective processing of the order acceptance and handling as well as complication-free communication with the responsible clerks.

You can object at any time to the processing of your personal data in accordance with Art 21 GDPR, stating reasons. Please send your revocation to DataProtectionOffice@cchellenic.com.

2.4. Recipients of the data

- (i) In order to be able to organise the contract initiation and execution of the contract and thus our service in a smooth and effective manner, we

are using Coca-Cola HBC BSO, 8 Racho Petkov Kazandzhuyata Str. 1766, Sofia, Bulgaria as a service provider.

- (ii) Furthermore, we transmit your data to our logistics partners for smooth delivery of goods. If you have any questions, please contact us at DataProtectionOffice@cchellenic.com.

Our service providers may have access to your personal data and are contractually obliged in accordance with Article 28 GDPR to always protect your personal data, to implement appropriate technical and organisational measures with regard to the security of the data and under no circumstances to process your data for their own purposes or to forward it to third parties.

In the course of this processing activity, no transfer of your personal data to third countries will take place.

2.5. Duration of storage

In principle, personal data, in particular those of the clerks, are stored until the end of the business relationship or 3 years after the end of the business relationship, if there is a legitimate interest in the retention, such as contact details for the facilitated correspondence for post-processing. However, we are obliged to keep tax-relevant data in accordance with Section 132 BAO and business letters in accordance with Section 212 UGB for a period of at least seven years. Furthermore, the data will be stored as long as specific claims are asserted against us or we need them to enforce our claims. If you have any questions about the specific retention period of your personal data, please contact us at DataProtectionOffice@cchellenic.com.

2.6. Further processing of data

The personal data collected or generated for this purpose of processing will be further processed in our contract management system as well as for the purpose of our efficient customer management and payment management.

2.7. Automated decision-making

The aforementioned data is not processed for automated decision-making, nor do we carry out the so-called "profiling".

3. **Procurement**

3.1. Scope of data processing

As part of our compliance management, we process the following data of our business partners, in

particular our suppliers, as part of our procurement business:

Name, first name, salutation, title, gender, address and contact details, company register data, VAT number, ATU number, other identifiers, contact details, contact persons, banking data, supplier group, supplier category, purchasing group, industry, correspondence language, date of registration as supplier, username and password for platform, date and time of log-in activities, time stamp of activities, if applicable, information on the participation procedure, if applicable information on the content of the invitation to tender (type, scope, content, service date, condition, deadline for the submission of tenders), if applicable, information on the content of the offer (type, scope, content, offer, date of performance, conditions, Signature), if applicable information on the approval procedure, if applicable information on the release, if applicable product/service number, if applicable product/performance category, if applicable product/performance quantity, if applicable product/service quantity, if applicable product/service price, if applicable, other costs in connection with the delivery, also information on feedback interview (date, content, participants, result), annual order volume over EUR 20,000 (yes/no), annual order volume over EUR 100,000 (yes/no), non-disclosure agreement (yes/no), Ecovadis certification (yes/no), information on cost efficiency, for commentary text box.

3.2. Purpose of data processing

The purpose of the present processing is to organise and process tenders and contracts as quickly and efficiently as possible. For this purpose, a platform of the controller is used on which the business partners or their administrators can register and submit their offers or via which communication can be handled in the event of any queries. The processing activity is part of the compliance management of the controller and serves in particular to make the tendering process, acceptance of the offer and conclusion/signing of the contract transparent for all participants and thus to comply with the due diligence obligations of a buyer.

3.3. Legal basis for data processing

We process the personal data on the basis of our legitimate interests pursuant to Art 6 (1) f GDPR in order to organise and process tenders and contracts as quickly and efficiently as possible. Furthermore, it is in our legitimate interest to comply with the internal compliance guidelines and to design the tendering process and in particular the acceptance of the

contract, i.e. our purchasing and procurement management as transparently and comprehensibly as possible for all participants. This serves our due diligence obligations as a contracting party, which partly also acts on behalf of the public. If you do not want us to process your data as part of our purchasing and procurement process, this may mean that we cannot grant you access to our platform and thus to the tender process.

You can object at any time to the processing of your personal data in accordance with Art 21 GDPR, stating reasons. Please send your revocation to DataProtectionOffice@cchellenic.com.

3.4. Recipients of the data

- (i) In order to be able to use our platform and thus the tender process smoothly and effectively, we engage SAP Deutschland SE & Co. KG, Hasso-Plattner-Ring 7, 69190 Walldorf and SAP America, Inc, 3999 West Chester Pike, Newtown Square, PA 19073, USA as a service provider. This service provider may have access to your personal data and is contractually obliged in accordance with Article 28 GDPR to always protect your personal data, to implement suitable technical and organisational measures with regard to data security and under no circumstances to process your data for its own purposes or to pass it on to third parties.
- (ii) Furthermore, we are using EcoVadis SAS, 43 / 47 Avenue de la Grande Armée, 75116 Paris, France as processor to carry out or obtain the appropriate certifications. According to Art 28 GDPR, this service provider is also obliged to always uphold the protection of your personal data, to take appropriate technical and organisational measures with regard to the security of the data and in no way to work your data for its own purposes or to forward it to third parties.
- (iii) In addition, we are using the Coca-Cola HBC BSO 8 Racho Petkov Kazandzhivata Str. 1766 Sofia, Bulgaria as a service provider to support our ordering processes. The latter may have access to your personal data and is contractually obliged under Art 28 GDPR to always uphold the protection of your personal data, to take appropriate technical and organisational measures with regard to the security of the data and in no way to work your data for its own purposes or to pass it on to third parties.
- (iv) In addition, we transfer the data to the following recipients within the scope of our legitimate interests pursuant to Art 6 (1) (f) GDPR for the purpose of processing business relationships with

joint suppliers and, if necessary, for audit purposes:

CCB Management Services GmbH ("CCBMS"), Am Euro Platz 2, 1120 Vienna;
Coca-Cola HBC Sourcing B.V., Radarweg 60, 1043 Amsterdam, The Netherlands

In the course of this processing activity, no transfer of your personal data to third countries will take place.

3.5. Duration of storage

In accordance with our internal compliance guidelines, which always oblige us as a buyer to take care and transparency for all participants, we keep your data protected from access for a period of five years after the acceptance of the offer/rejection of the offer. In addition, the data will be retained for as long as concrete claims are made against us or that we need them to enforce our claims. If you have any questions about the specific retention period of your personal data, please do DataProtectionOffice@cchellenic.com.

3.6. Further processing of data

The personal data collected or generated for this purpose of processing will be further processed in our contract management system as well as for the purpose of our efficient customer management and payment management as well as in our Compliance Due Diligence Tool.

3.7. Automated decision-making

The aforementioned data is not processed for automated decision-making, nor do we carry out the so-called "profiling".

IV) RIGHTS OF DATA SUBJECTS

As a data subject being affected by our data processing activities you may exercise the following rights:

a) Right of access

You have the right to request information at any time and without informal form as to which data about you are processed by us as responsible – together with further information such as their processing purposes and recipients, information about the origin of the data and information about automated decision-making and the logic involved. You also have the right to request information as to whether the personal data concerning you will be transferred to a third country or to an international organisation, including the right to be informed of the appropriate safeguards under Article 46 GDPR.

b) Right to rectification and right to restrict processing

You may request the correction or completion of incorrect or incomplete data. You also have the right to request a restriction on the processing of data, that it may only be processed with your consent or for the assertion, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of an important public interest, for example, if the accuracy of the data is disputed.

c) Right to data portability

You may request that a copy of the data, if made available to us, be sent to you - or to the extent technically feasible, to a third party that can be determined - in a structured, common and machine-readable format.

d) Right to erasure

You may request the deletion of your data under certain circumstances, for example if this is not processed in accordance with the data protection provisions.

e) Right to object

You have the right to object to the processing of personal data at any time, stating reasons. In this case, we will no longer process the personal data concerning you, unless we can give and substantiate compelling legitimate grounds for processing that outweigh your interests, or the processing serves to assert, exercise or defend legal claims.

f) Right to withdraw your declaration of consent

If we process your data on the basis of a prior consent, you have the right to revoke this data protection declaration at any time and without giving reasons by e-mail to DataProtectionOffice@cchellenic.com. The revocation of consent does not affect the legality of the processing carried out on the basis of the consent until the revocation. We will delete your data immediately, unless any legal provisions require retention.

V) Supervisory authority

If you believe that the processing of your data violates your right to confidentiality or your data protection claims have otherwise been violated in any way, you may contact the supervisory authority to be affected. In Austria, the

Austrian Data Protection Authority

Barichgasse 40-42, 1030 Vienna.

This is without prejudice to the possibility of filing an action with the regional court pursuant to section 29(2) of the Austrian Data Protection Act (DSG) and any other legal remedies.

VI) ADAPTATION OF THE PRIVACY POLICY

We reserve the right to amend this Privacy Policy at any time in compliance with the applicable data protection regulations. Data subjects are requested to check regularly on the content of the privacy policy.

As of: February 2022