

Privacy policy regarding our marketing activities

The protection of your personal data is of particular concern to us. With this privacy policy, we would like to inform you about how we use your personal data in the context of marketing activities. We attach great importance to the protection accuracy and integrity of your personal data.

All disclosed or transmitted data will be processed in compliance with the provisions of the national Data Protection Act, the General Data Protection Regulation (GDPR) and the Telecommunications Act, each as amended.

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

E-mail: DataProtectionOffice@cchellenic.com
(hereinafter "we", "CCHBCA")

II) Processing activities

I. Sending newsletters

In the context of sending newsletters, we process the following data.

a) Scope of data processing

Title, name, surname, e-mail address, consent details if applicable (yes); information on the status of declarations of consent and, if applicable, withdrawals; if applicable, date of

consent; if applicable, planned date of obtaining consent again, date and time of sending a newsletter.

b) Purpose of the data processing

The purpose of the IT-based data processing is to be able to organize our marketing activities smoothly and efficiently. The aim of sending the newsletter is to provide our customers and customers and interested parties with news from the CCHBCA company.

If you do not wish to provide your data or do not wish to provide it in the future, we will unfortunately not be able to send you a newsletter.

The notice that you can withdraw your consent at any time can be found to each of our mailings. After proving your consent, we process your email address for this purpose.

c) Legal basis of the data processing

The aforementioned data is processed exclusively for sending the newsletters, the processing takes place on the basis of your consent according to Art. (6)(1)(a) GDPR. When we process the data for this purpose, we will of course also comply with the requirements of telecommunications law, in particular §107 Telecommunications Act 2003.

If you no longer wish to receive our newsletter, you can withdraw your consent at any time and without providing justification. To do so, please send us an e-mail to DataProtectionOffice@cchellenic.com.

Upon withdrawal, we will delete your data from our system for newsletter distribution.

d) Recipient of the data

Within the scope of sending the newsletters, we use the following service providers due to efficient processing following service providers,

who may have access to your personal data in the course of their activities: Domino Design IT-Solutions Richard Platzer, Liebenauer Hauptstrasse 2-6, 8041 Graz.

The aforementioned service provider is contractually obligated to always protect your personal data, to take appropriate technical and organizational measures regarding the security of the data and under no circumstances to process your data for their own purposes or to forward it to third parties.

e) Storage period

If you provided us your consent to the processing of data for the purpose of sending newsletters, this processing is based on your consent. You can withdraw your consent at any time at DataProtectionOffice@cchellenic.com without providing justification. Any processing that has taken place up to the withdrawal remains lawful. After withdrawal we will delete your data immediately.

f) Further processing of data

The aforementioned data will not be processed for any other purpose and will not be sent to third parties under any circumstances.

g) Automated decision making

The aforementioned data will not be processed for automated decision-making and we do not carry out so-called "profiling".

II. **Data processing in the context of customer satisfaction surveys**

Within the scope of electronic customer satisfaction surveys, we process the following data.

a) Scope of data processing

Company name, customer number, first name and surname, title, if necessary also function of the contact person at the customer, telephone and e-mail address and other information required for addressing, company address, language of correspondence, information on CCHBCA products and services, information on the assignment or classification of the company for

example, retail customer, gastronomy customer, wholesale customer, direct customer or indirect customer, etc., volume information on CCHBCA products, if applicable, participation yes/no, date of participation, date and time of log-in, free text field.

b) Purpose of the data processing

The purpose of the processing in question is to conduct short satisfaction surveys with our direct and indirect customers at regular intervals (approx. 2x per year; max. 4 x per year) to improve and increase customer satisfaction. From the results we receive, an analysis is made of the relevant strengths and weaknesses in the handling of business relationships and the relationship with end customers. From this we derive action plans to improve or increase customer satisfaction (e.g., customer demand for more innovations, improvement of processes, increased frequency of field service visits, if necessary, etc.). If you wish and give us your consent, we will contact you after evaluating the survey results.

Your data may be transferred in aggregated form to the CCH Group, thereby also supporting us in the maintenance and international customer relations and can actively contribute to our product and service product and service portfolio.

c) Legal basis of the data processing

We base the processing on the legitimate interest according to Art.(6)(1)(f) GDPR, you may at any time, by providing justification, object the processing of your personal data pursuant to Art. 21 GDPR. Please address your objection to DataProtectionOffice@cchellenic.com.

a) Recipients of the data

In principle, your data will only be forwarded in aggregated form to Coca-Cola HBC AG, Turmstrasse 26, 6312 Steinhausen, Switzerland.

Furthermore, we involve Customer Gauge (Directness B.V.), Van Diemenstraat 182, Amsterdam 1013CP, The Netherlands as a processor. This processor may have access to your personal data and is contractually obligated in accordance with Art. 28 GDPR to always protect your personal data, to take appropriate technical and organizational measures regarding the security of the data and not to process your data for their own purposes or to forward it to third parties.

b) Storage period

We will delete your data within the framework of the customer satisfaction survey after a maximum of 18 months after participation in a survey.

c) Further processing of data

The data processed for this purpose will be used internally for the purposes of handling the business relationship, for example, for field service planning, our order processing, etc. For questions and to receive detailed information on the extent to which and on which legal basis we process your data for other purposes, please contact us at DataProtectionOffice@cchellenic.com.

d) Automated decision making

The aforementioned data is neither processed for automated decision making, nor we carry out so-called "profiling".

III. **Data processing in the context of marketing activities**

a) Scope of processing

If you have given us your consent for this, we will also process your data for our advertising activities in order to be able to adapt our marketing strategy to your needs. The following data will be processed for this purpose: Name, surname, telephone number, email address and your usual purchase

volume. We also receive this data from our business partners, among others, who obtain separate consent from you for the transfer of data to us.

b) Purpose of data processing

We process the above-mentioned data in order to be able to adapt our offers, our products and services to you according to your needs. In order to be able to offer you our best offers, it is necessary in particular to process your purchase volume details. You can revoke your consent for this at any time. We will no longer process your data for this purpose but ask for your understanding that in this case we will no longer be able to send you advertising tailored to your needs.

c) Legal basis of the data processing

We process personal data based on your consent pursuant to Art (6)(1)(a) GDPR. You can revoke this consent at any time without giving reasons. To do so, please send your revocation to DataProtectionOffice@cchellenic.com. In case you do not give your consent, this will not have any effect on the purchase of our products and services, but we ask for your understanding that in this case we will not be able to send you advertising and offers tailored to your needs.

d) Recipients of the data

Your data will not be passed on to third parties and will not be processed for any other purpose. In some cases, service providers support us, particularly operationally, with certain aspects of the provision of services or promotions, and in purposes of marketing analytics. We regularly work together with the following service providers:

- AFT Plus Promotion Sales GmbH, Engelsberggasse 5/3, 1030 Vienna
- KESCH Event & Promotions Sales, GmbH, Brehmstraße 12/4, 1110 Vienna
- Maxfive GmbH, Industrial Centre Lower Austria South, Street 3, Object 16, 2355 Wiener Neudorf
- Dominio Design - IT-Solutions, Liebenauer Hauptstrasse 2-6, 8041 Graz-Liebenau
- Sven Fuchs, Rathausgasse 10, 2630 Ternitz

In addition, specialized service providers may

support us in the context of individual marketing campaigns, in the context of services in these marketing campaigns.

These specialized service providers are used by us exclusively on the basis of a specific order and for the duration of this order. These service providers vary depending on the nature of the specific marketing action and the specialization of the respective service providers. Due to the uniqueness and irregularity of the engagement of these service providers, no specific naming is possible.

These service providers may have access to your personal data and are contractually obliged in accordance with Art. 28 of the GDPR to always protect your personal data, to implement suitable technical and organizational 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.

e) Storage period

Your data will be stored and processed until you withdraw your consent.

f) Further processing of the data

The data processed for this purpose will not be further processed for any other purpose.

g) Automated decision-making

The aforementioned data is neither processed for automated decision-making nor do we carry out so-called "profiling"

IV. Your rights as a data subject

As a data subject of our data processing, you are generally entitled to the following rights available to you:

a) Right of access

You have the right at any time and informally to request information about which data concerning you processed by us as the person responsible - together with further purposes and recipients, information about the origin of the data and information about the origin of the data and information about automated decision-making including the logic involved. Furthermore, you

have the right to request information as to whether the personal data concerning you is transferred to a third country or to an international organization, including the right to be informed about the appropriate safeguards for this appropriate guarantee pursuant to Art. 46 GDPR.

b) Right to rectification and right to restriction of processing.

You may request the rectification or completion of inaccurate or incomplete data request. You also have the right to request a restriction of the processing of data that it may only be used 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 important public interest, if, for example, the accuracy of the data is not guaranteed.

c) Right to data portability

You may request that a copy of your data will be sent to you - or, if technically feasible, to a third party - insofar as it has been made available to CCHBC, in a structured common and machine-readable format.

d) Right to deletion

You can request the deletion of your data under certain circumstances, for example if they are not processed in accordance with data protection regulations.

e) Right to object

You have the right to object at any time, by providing justification, to the processing of your personal data. We will no longer process the personal data relating to you in this case, unless we can demonstrate compelling legitimate reasons for the processing which override your interests, or the processing serves the assertion, exercise or defence of legal claims.

f) Right to withdraw your declaration of consent

You have the right to withdraw your declaration of consent under data protection law at any time and without giving any reasons by sending an e-mail to DataProtectionOffice@cchellenic.com. The withdrawal of consent does not affect the lawfulness of the processing carried out based on the

consent until the withdrawal.

a) Supervisory authority

If you believe that the processing of your data violates your right to secrecy or that your data protection rights have been violated in any other way, you can complain to the competent supervisory authority. In Austria, the competent authority is the Austrian Data Protection Authority, Barichgasse 40-42, 1030 Vienna.

This is without prejudice to the possibility of filing a complaint with the regional court pursuant to Section 29 (2) Data protection Act and any other legal remedies.

V. Adjustment of the privacy policy

We reserve the right to adapt this data protection declaration at any time in compliance with the applicable data protection regulations. You are requested to inform yourself regularly about the content of the data protection declaration.

(May 2024)