

## **Privacy policy for the sending of newsletters and customer satisfaction surveys**

Dear Sir or Madam,

Thank you for your trust and consent to receive newsletters and links to customer satisfaction surveys.

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 the sending newsletters and in the case of electronic customer satisfaction surveys. 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](mailto:DataProtectionOffice@cchellenic.com)

### **I) Controller**

**Coca-Cola HBC Austria GmbH**

Clemens-Holzmeister-Strasse 6

1100 Vienna

E-mail: [DataProtectionOffice@cchellenic.com](mailto: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, free text field for comments.

##### **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 efficient. 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 in order to receive our newsletter, 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](mailto: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 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](mailto: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

The processing of the aforementioned data is based on the consent given in accordance with Art. (6) (1) (a) GDPR. You can withdraw this consent at any time without providing justification. For this purpose, please address your request to [DataProtectionOffice@cchellenic.com](mailto:DataProtectionOffice@cchellenic.com). If you do not provide us your consent, it will not have any impact on the purchase of our products and services.

Should we base the processing on the legitimate interest according to Art. (6) (1) (f) GDPR for example in the case of direct customers, 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](mailto:DataProtectionOffice@cchellenic.com).

d) 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 CustomerGauge (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 protection of 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 to process your data for its own purposes or to forward it to third parties.

e) 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.

f) 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 please contact [DataProtectionOffice@cchellenic.com](mailto:DataProtectionOffice@cchellenic.com)

g) Automated decision making

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

### **III) 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 your 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](mailto:DataProtectionOffice@cchellenic.com). The withdrawal of consent does not affect the lawfulness of the processing carried out based on the consent until the withdrawal.

g) 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 to inform yourself regularly about the content of the data protection declaration.

As of October 2021