

SOWETO BREWING COMPANY (PROPRIETARY) LIMITED: PRIVACY POLICY

1. Introduction

Soweto Brewing Company Proprietary Limited., registration number 2017/023746/07, located at Inanda Greens Business Park, Building 1, 54 Wierda Road, Sandton, South Africa (“**we**”, “**us**”) is the responsible party for the processing of your personal information collected through this website (“**Website**”) or through engagements between you and us. We are a subsidiary of HEINEKEN South Africa (RF) (Proprietary) Limited, information about HEINEKEN South Africa can be found here: www.heinekensouthafrica.co.za. We respect your privacy and we are committed to keeping your personal information secure and managing it in accordance with our legal responsibilities under applicable data protection laws including the Protection of Personal Information Act, 2013 (“**POPIA**”).

Please read this Privacy Policy carefully as it contains important information to help you understand our practices regarding any personal information that you give to us or that we collect otherwise in the context of the Website and our different engagements with you.

2. Children's Privacy

You must not provide us with your personal information if you are below the legal age to consume and/or purchase alcohol in the jurisdiction in which you reside and (if different) in the jurisdiction in which you are accessing our website.

3. Information that we collect about you AND purposes of collection

- For certain services or activities on the Website, you will need to provide your personal information. In addition, we collect certain information when you visit our Website. If you do not provide the required information, we will not be able to be of any assistance. The information that we collect about you on the Website is:
 - **information when you contact us** - if you visit our Website and have a question or other remark or query, you can submit via our “Contact” form that is found on the Website. You will be required to provide your name, surname, email address, and information about your request. This information is required to respond to your questions or comments or other remarks. In addition, we collect this personal information as may be required by legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law.
 - **information about your visit to and use of our Website** - we collect certain information when you visit our Website, such as your IP address, which web pages you visit, device category, browser, and type of internet browser, clicks and views. We use this personal information as it is necessary in our legitimate interests to do so to be able to improve your experience on our Website, to track traffic flows and to make our websites easier for you to use and to better understand how our websites are used, for maintenance and analysis of our Website to solve performance issues and to improve the availability and user experience. In addition, we collect this personal information as may be

required by legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law

- For any engagement that we have with you, we collect certain personal information in order to be able to provide our products or services. If you fail to provide us with the information, we will not be able to be of any assistance and therefore will not be able to provide any products or services:
 - **Customer/consumer orders:** when you order products from us, we require your –
 - Business Name, address and contact details
 - Vat Number
 - Liquor license
 - Name and contact details of person ordering and person in charge of accounts
 - **Engagements via our social media groups:** if you engage with us on any of our social media groups such as Whatsapp, Facebook, Twitter or Instagram, we may collect your contact details in order to be of further assistance.
 - **Engagements via our website:** you may register to receive direct marketing messages from us.

4. Direct Marketing

Direct Marketing means to *approach a data subject (such as yourself) either in person or by mail or electronic communication for the direct or indirect purpose of promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; or requesting the data subject to make a donation of any kind for any reason.*

We may, from time to time, and subject to POPIA, other applicable laws and this Privacy Policy, send you Direct Marketing communications.

Under POPIA we are allowed to send you Direct Marketing by means of electronic communication if:

- a. you have given prior consent to such Direct Marketing; or
- b. if you are an existing consumer of Soweto Brewing Company and:
 - i. we have obtained your contact details in the context of a sale of our product(s) or service(s);
 - ii. for the purpose of Direct Marketing of our own similar products or services; and
 - iii. if we have given you reasonable opportunity to object, free of charge and in a manner free of unnecessary formality, to such use of your contact details at the time that your details were collected and on the occasion of each communication with you for the purpose of marketing if you have not initially refused such use.

You can opt out of receiving Direct Marketing communications from us at any time. Any Direct Marketing communications that we send to you will provide you with the information on how to opt out from receiving Direct Marketing communications from us. Any opt out requests (or withdrawal of consent from receiving direct marketing messages) must be done using the opt out details provided on the direct marketing communications.

5. Use of Cookies

We use “cookies” on our website. They enable us to improve your future visits to our site as well as provide you with a more user-friendly experience. You can read more about this on our “Cookie Policy” that can be found on our Website [here](#).

6. Disclosure of Personal Information

We share your personal information with the following:

- As we are a subsidiary of HEINEKEN South Africa, we share your information with HEINEKEN South Africa, if we require support services from the group such as information technology support/maintenance, legal support and to perform certain functions which we are not able to perform, without their support;
- our agents, advisers, business partners, service providers and suppliers (our creative, brand, digital, marketing and media agencies) for the proper running of our Website and handling of requests and comments as stipulated in paragraph 3 above;
- our legal advisors who advise on applicable laws and legal requirements;
- a third party who would require information about our relationship with you, in the event of a transfer or a sale to such third party or establishment of a relationship with a third party, such as a merger, consolidation, change in control, sale of shares, sale of assets, sale of business;
- our employees who require your personal information to do their jobs. Our employees are contractually bound to keep all confidential information confidential and to protect personal information; and
- government and law enforcement agencies, where the law requires that we disclose your personal information to such government and law enforcement agencies.

7. Security of your Personal Information

We take all reasonable and appropriate technical and organizational measures to protect your personal information. This includes saving all personal information in secure servers. Where we share your personal information with third parties (as listed in paragraph 6 above), we enter into agreements with such parties whereby we require such third parties to use reasonable and appropriate measures to protect the confidentiality and security of your personal information.

8. Transfer of your personal information to other countries

Your personal information may be transferred to another country. For example, we may host (or store) your personal information in a data centre outside South Africa, if we are able to remotely access your personal information from abroad or when we share with our related entities as part of our reporting procedures or one of our IT suppliers provides off-premise maintenance and support services from outside South Africa. Countries to which we transfer personal information may have different privacy standards than the ones in South Africa. We will always comply with the requirements under the applicable data protection laws in South Africa such as the POPIA for the international transfer of personal information. If we transfer your personal information to a country that does not offer an adequate level of protection we will ensure that we have put in place adequate safeguards to protect your personal information or otherwise ensure that we can transfer your information in a way that complies with data protection law.

9. Retention of your personal information

We will keep your personal information for as long as is necessary to fulfil the purposes that is described in this policy, and provided such retention is authorised by law. Generally, printed orders and delivery notes are kept for a period of 5 years for statistical purposes and for tax return purposes.

For direct marketing purposes, we will delete or de-identify your personal information when you opt out of receiving any direct marketing messages. However, we will keep your contact number to ensure that we do not send you any further direct marketing messages in the future.

10. Your Rights

You have a number of rights in relation to your personal information and these are:

- the right to access your personal information (i.e. obtain an overview of your personal information that we process). Further details on how you can request access to your personal information are found on our PAIA Manual that is found on this Website;
- the right to have your personal information corrected, updated rectified or erased or to restrict the processing of your personal information;
- where we rely on your consent for the processing of your personal information, you may withdraw your consent at any time and you can object to some of the ways we use your personal information. You can request us using the details under “**Contact**” below at any time;
- the right to object to the processing of your personal information at any time, on reasonable grounds relating to your particular situation, unless the processing is required by law;
- the right to object to the processing of your personal information, at any time, if the processing is for purposes of direct marketing other than direct marketing by means of unsolicited electronic communications and you have not given your consent for that processing;
- the right not to have your personal information processed for purposes of direct marketing by means of unsolicited electronic communications from third parties unknown to you;
- the right to lodge a complaint with the Information Regulator of South Africa via email at infoereg@justice.gov.za. Further details about the Information Regulator can be found at <https://www.justice.gov.za/infoereg/>.

If you would like to exercise any of these rights, please contact us using the details under “Contact” below. To make sure that we do not provide information about you to someone else, we may ask for your identification before we can process your request.

11. Changes to this Privacy Policy

We will keep this Privacy Policy under review and make updates from time to time. Any changes to this Privacy Policy will be posted on our website page and to the extent reasonably possible, will be communicated to you. Such changes shall be effective immediately upon the posting of the modified Privacy Policy. We advise you to regularly read this Privacy Policy for possible changes.

12. Contact

If you have a complaint about how your personal information is processed by us or about our privacy and information protection practices in general, you can contact our Information Officer at legalsa@heineken.com.

Last updated: 18 June 2021