

DIAGEO PRIVACY STATEMENT FOR BUSINESS PARTNERS

This Privacy Statement for Business Partners explains how Diageo collects and uses the personal information of our Business Partners (which include our customers) or their employees ('you'), who are conducting business with Diageo. Diageo will be the 'data controller' of any personal information processed in connection with this business relationship, for the purposes of data protection law. For the purposes of this Privacy Statement, 'Diageo' means the local Diageo entity contracting with the Business Partner, which are Mey İçki Sanayi ve Ticaret A.Ş. and Mey Alkollü İçkiler Sanayi ve Ticaret A.Ş. in this case.

If you use a Diageo website or interact with us as a consumer, please also read our online Privacy and Cookie Notice <https://policies.diageohorizon.com/>.

1. What personal information do we collect about you?

We may collect your name, telephone number and e-mail addresses, billing and payment information (such as credit card or bank account number), tax numbers and business licence information (if you are a sole trader), your mailing preferences, delivery instructions, reference information, customer service preferences, and vehicle and other visitor information collected when you visit our facilities (including, at some facilities, video surveillance of facility perimeters). We will also maintain records of our correspondence with you.

We may also collect personal information from you as part of our Business Partner identification verification process ('Know Your Customer' or 'Know Your Business Partner', as relevant), for example copies of your identification documents and details of your ownership of the business.

We may collect this information directly from you, or from your employer or, in the circumstances described below, from a credit reference agency.

2. Legal Bases for Processing

We process your personal information where it is necessary to enter into or perform a contract with you, to comply with our legal obligations (for example to fulfil our anti-money-laundering or anti-bribery requirements), or where it is in our legitimate business interests to do so (for example, where we have a commercial relationship with your employer).

Where, in the course of conducting any anti-money laundering or other legally mandated checks on you, we process information about your criminal convictions, political opinions, or other special category data, we do so on the basis that: (i) you have given your explicit consent, acknowledging that the processing is strictly necessary for Diageo in order to continue our commercial relationship with you in light of our legal and compliance commitments; and/or (ii) it is necessary for the purposes of the prevention of unlawful acts, including terrorist financing and money laundering.

3. How do we use this personal information?

We use your personal information in order to set up, manage and maintain our business relationship with you or your employer as a Diageo Business Partner. In particular:

- To process any orders you submit, make deliveries to you, and contact you in relation to any enquiries, orders, or matters relating to your account.
- To fulfil our anti-money laundering and anti-bribery requirements, both at the start of the business relationship and on an ongoing basis.
- To grow and develop our relationship with you as our Business Partner, we may send you postal, email or telephone marketing, including news, promotions and updates about Diageo and the products and services we offer.
- To carry out identity verification checks. In some countries, we may use a credit reference agency to assist with these checks and so we will share with the agency certain personal information, including your forename and surname, personal address and previous address, date of birth and gender, to enable them to confirm your identity.
- To confirm the financial health of your business, in circumstances where we are considering establishing or continuing a commercial relationship with you as an individual (i.e. a sole trader), extending a credit or evaluating your credit standing. As a result we reserve the right to gather and share relevant credit information with appropriate third parties.
- Where necessary to protect the interests of Diageo, our affiliates, employees or third parties (for example, in the event of a legal claim or other regulatory matter).

4. Disclosure of personal information

Your personal information may be shared with other affiliates in the Diageo group of companies, as necessary to operate our business. We may share your personal information outside the Diageo group in the following circumstances:

- to our service providers, retained to perform functions on our behalf or to provide services to Diageo, such as warehousing and delivery; marketing and advertising; data processing; software development;
- to our service providers, retained to perform functions on our behalf or to provide services to Diageo such as data processors that support our identification and verification process; information technology and office services; legal, accounting, audit and other professional service providers;
- to credit reference agencies who assist us with identity verification and credit reference checks, as described above;
- in response to a valid request, subpoena, warrant, order or demand from law enforcement, courts and government agencies, including those in foreign countries;
- otherwise with your consent or where permitted by applicable law.

5. Will we transfer your personal information abroad?

Please note that your personal information may be transferred to, and stored at, a destination outside the country in which you reside, including countries which have less strict, or no data protection laws, when compared to those in your country.

Whenever we transfer your information as described in the paragraph above, we will take steps which are reasonably necessary to ensure that adequate safeguards are in place to protect your personal information. In these cases, we rely on approved data transfer mechanisms (such as the EU “Standard Contractual Clauses” or the EU-US “Privacy Shield”) to ensure your information is

subject to adequate safeguards in the recipient country. If you are located in the EEA or the UK, you may contact us for a copy of the safeguards which we have put in place to protect your personal information and privacy rights in these circumstances.

6. How long will we retain your personal information for?

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law. This will generally be at least as long as we continue to have a business relationship with you. After this period it will be deleted or in some cases anonymised.

Please contact your Diageo business contact if the information we hold about you has changed and needs to be updated.

7. Your rights

You have certain rights in relation to your personal information. These rights include the right to object to the processing of your information for certain purposes (including marketing), the right to access your personal information, and the ability to erase or restrict your personal information. You may also unsubscribe from any of our marketing communications at any time.

If you wish to exercise any of these rights you may contact us using the contact details provided below. We will handle any request to exercise your rights in accordance with applicable law and any relevant legal exemptions.

You may also have the right to complain to a data protection authority if you think we have processed your personal information in a manner which is unlawful or breaches your rights. If you have such concerns we request that you initially contact us (using the contact details below) so that we can investigate, and hopefully resolve, your concerns.

8. Contact Us

If you have any privacy-related questions, concerns or complaints, please contact: Data Privacy Officer, Global Compliance Legal Team, Diageo plc, Lakeside Drive, London, NW10 7HQ, United Kingdom or email CustomerSARS@diageo.com or if you are a vendor, email VendorSARS@diageo.com.

This Privacy Statement was last revised: 07.02.2019