

CUSTOMERS AND BUSINESS PARTNERS PRIVACY POLICY

1. Introduction

Mey İçki Sanayi ve Ticaret A.Ş. and Mey Alkollü İçkiler Sanayi ve Ticaret A.Ş. (together hereinafter referred to as “**we**” or “**us**” or “**Mey**”) collects and processes the personal data of customers, sales points, distributors, agencies (together hereinafter referred to as “**Business Partners**”) which establish or aims to establish a commercial relationship with Mey and the shareholders, employees, managers, representatives of such Business Partners. This Privacy Policy aims to inform you about the way we process and protect your personal data under the EU General Data Protection Regulation (“**GDPR**”) and other related laws.

2. Legal Purchase Age

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

We do not intend to collect personal information from any individuals under the legal purchase age, or to market alcoholic beverages to anyone under the legal purchase age.

If we receive notice or believe that someone under the legal purchase age has provided us with personal information, we will make every reasonable effort to remove such personal information from our records.

3. Personal Data We Collect

We collect and process your personal data such as:

- Name, surname, phone number, email;
- Finance information such as billing and payment information (credit card or bank account number); if you conduct your business as a sole proprietorship, tax number, business license number,
- Purchase order, request, complaint, and suggestion information;
- Your commercial electronic message or mailing preferences, delivery order, customer service preferences;
- Point information, prize preference information;
- If you visited our company facilities; CCTV records, vehicle information, and visitor information.

If you are involved in the Know Your Customer and Know Your Business Partner processes, we also collect and process your following personal data:

- Company name, title, city, country, region, passport number, copies of your identification documents (if necessary);
- Measures to promote ethical business practice;

- If you are a director, senior manager, or shareholder; being the director, senior manager, or shareholder information, number of shares you own, nationality, roles, ownership interests in other organizations;
- If you conduct your business as a sole proprietorship, trading name, former legal names, main office, place of incorporation, registration number, activity reports, details of your contract with us, bank account details, intermediary information and details, facilitation payment information, risk score, unusual remuneration information;
- Whether there is an investigation or prosecution about corruption, bribery, graft, fraud, competition/anti-trust, money laundering or improper payment and the details;
- Whether you are in a sanction list, watchlist or blacklist, whether you are a politically exposed person or a government official, whether you participated in illegal activities as an adverse media; and if you fall into any of these categories, full name, photo, gender, date of birth, country of resident, country of citizenship, address, occupation details, risk category details.

4. Collection Method of Your Personal Data

We collect your personal data in a number of ways, including:

- Directly from you via e-mail, telephone, mobile application, website, SMS, printed form and/or other physical and electronic environment.
- When you enter a competition or take advantage of a promotion or attend any of our promotional events.
- When you register on a website or app or fill in an online questionnaire.
- From publicly available sources of information.
- From our own records of how you use our services.

Information we automatically collect/generate: When you browse or use our websites or apps (as well as certain third-party websites with whom we have partnered) we (and our partners) use cookies and similar technologies to collect information automatically from one or more of your devices associated with you. In addition, we receive IP addresses from all users because this information is automatically reported by your browser each time you view a web page. For most users accessing the internet, the IP address will be different every time you log on. IP addresses are generally recorded in files called “log files”.

Information we obtain from third parties: In addition to the information we collect as described above, we may also partner with and use the services of various third parties to collect personal data about you from other sources, we will only obtain such information where we have your consent and/or another legal ground to do so. This information may include:

- Data from other organisations who have obtained your permission to share information about you with us;
- Data we receive when someone refers you for our products and services (please see below for more);

- Data we may require from other organisations to fulfil our legal obligations; and/or
- Where your information is publicly available.

Here are a few places third party data may come from:

- Public information sources.
- Third party social media platforms.
- Other third-party websites, business partners.
- Credit reference agency.
- Group companies.

5. Use of Your Personal Data

We process your personal data for the following purposes:

- Establishing a commercial relationship with our Business Partners, and managing and maintaining this relationship;
- Enabling you to place your order, processing your order, delivering your order, contacting you for any issue about your order or account;
- Providing you prizes and similar promotions and delivering these prizes to you to carry out the processes of brand loyalty and marketing activities;
- Contacting you about our products and services, announcements, promotions, and news to grow and develop our relationship with the Business Partners;
- Providing you with advantages and creating customer loyalty programs;
- Protecting the rights of Mey, group companies, and third persons, in the event of any legal dispute, investigation, lawsuit or claim;
- Taking commercial and physical security measures (e.g. keeping visitor records in our company facilities.);
- Complying with our requirements for fighting against corruption, money laundering, terrorist financing, and tax crimes throughout the commercial relationship;
- Carrying out the Know Your Customer and Know Your Business Partner processes, preventing corruption and money laundering;
- Confirming 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;
- Carrying out the identity verification checks;
- 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).

6. Legal Basis for Processing

We collect and process your personal data on the following bases which are stated in Article 6(1) of the GDPR:

- Processing is necessary for the performance of our contract. For example, we will rely on this legal basis when we process your data for the purpose of establishing a commercial relationship with you as our business partner.
- Processing is necessary for compliance with a legal obligation to which we are subject. For example, we will rely on this legal basis when we process your data for the purpose of fighting corruption, money laundering, terrorist financing and tax crimes.
- Processing is necessary for the purposes of our legitimate interests pursued by the controller or by a third party, provided always that such interests are not overridden by your interests or fundamental rights and freedoms which require protection of personal data. For example, we will rely on this legal basis when we process your data for the purpose of taking physical security measures for our company facilities.

We collect and process your special categories of personal data on the following bases which are stated in Article 9(2) of the GDPR:

- You have explicitly given us your consent to process your personal data.

7. Disclosure of Your Personal Data

We will transfer your personal data as necessary to the Diageo group companies in order to carry out our commercial activities, fight corruption, money laundering, terrorist financing and tax crimes.

We may transfer your personal data to group companies of Mey for the purposes mentioned under the Section 5 “Use of Your Personal Data” as well as to any third parties to whom the relevant Mey entity subcontracts all or part of this processing. This may for instance include our team members, suppliers, business partners, hosting providers and any other relevant roles. Please note that we will never sell your data to a third party.

We may transfer your personal information to third parties in the following circumstances:

- to our service providers, retained to perform functions on our behalf or to provide services to Mey, 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 Mey 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.

In the event of transfer of data to a country outside of the European Economic Area, we ensure the application of an adequate level of protection of such data by means approved by applicable data protection legislation.

We may also, pursuant to a valid legal process (such as a search warrant, subpoena, or court order), allow access to information in our possession, in order to comply with such process and to protect our rights and property. We reserve the right to disclose any data or information obtained from or about you, to third parties in connection with a merger, acquisition, bankruptcy or sale of all or substantially all of our assets, to the extent that this is necessary for the process.

8. Business Partners' Disclosure of the Personal Data Belongs to Third Persons

The Legal Person Business Partners are required to:

- inform the managers, shareholders, employees, representatives, and other third persons about transfer of their personal data to Mey,
- introduce this Privacy Policy to the relevant data subjects,
- obtain explicit consents of such data subjects to disclose their personal data with Mey,
- take the necessary measures and fulfil the obligations set forth in the law.

9. Accuracy of Personal Data

The Business Partners accept and acknowledge that the information and documents forwarded to Mey are correct, accurate and complete. Otherwise, the Business Partners will be responsible for any loss or damages arising from such failure.

We may contact the Business Partners to confirm the accuracy of the information and documents.

10. Your Rights

If you are from the European Economic Area or in certain countries, you are also entitled (with some exceptions and restrictions) to:

- **Access:** You have the right to request information about how we process your personal data and to obtain a copy of that personal data.
- **Rectification:** You have the right to request the rectification of inaccurate personal data about you and for any incomplete personal information about you to be completed.
- **Objection:** You have the right to object to the processing of your personal information, which is based on our legitimate interests (as described above).
- **Deletion:** You can delete your account by using the corresponding functionality directly on the service.
- **Automated decision-making:** You have the right to object a decision made about you that is based solely on automated processing if that decision produces legal or similarly significant effects concerning you.

- **Restriction:** You have the right to ask us to restrict our processing of your personal data, so that we no longer process that personal data until the restriction is lifted.
- **Portability:** You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and to have that personal data transmitted to another organization in certain circumstances.
- **Complaint:** You have a right to lodge a complaint with the authorized data protection authority if you have concerns about how we process your personal data.

You may, at any time, exercise any of the above rights, by contacting us via kvkk@diageo.com, together with a proof of your identity,

In some cases, we may not be able to give you access to your personal data that we hold, if making such a disclosure would breach our legal obligations to our other customers or if prevented by any applicable law or regulation.

11. Right to Withdraw Consent

If you have provided your consent to the collection, processing and transfer of your personal data, you have the right to fully or partly withdraw your consent. To withdraw your consent please contact us via kvkk@diageo.com.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there are compelling legitimate grounds for further processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

12. Security of Your Personal Data

We take appropriate and reasonable technical and organizational measures to protect your personal data from loss, misuse, unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the personal data.

13. Retention Of Your Personal Data

We will only retain your personal data for as long as necessary to fulfill our collection purposes, including for the purposes of satisfying any legal, accounting, or reporting requirements, and where required for our company to provide services, until the end of the relevant retention period.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Upon expiry of the applicable retention period, we will securely delete, destroy or anonymize your personal data in accordance with applicable laws and regulations.

14. Changes to our Privacy Policy

We reserve the right to update and change this Policy from time to time in order to reflect any changes in the legal requirements or the way we process your personal data. Any changes we may make to our Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail or push notification. Please check back frequently to see any updates or changes to our Policy.

15. Contact Us

If you have any questions in relation to this Privacy Policy, please get in touch with us at kvkk@diageo.com.