

General Privacy Notice

For Our Contacts

In brief. Privacy is very important to us and it should be important to you, too. This is why we, at Coca-Cola, would like to ask you to read this Privacy Notice and learn about what we are doing with your data, what rights you have and how you can exercise them. We do our best to update this privacy notice every time there is a change in our processing to ensure that you always receive the most current information about how we treat your personal data.

1. Who we are, and what is this Privacy Notice about?

- a. We, Coca-Cola Company entities established in the European Economic Area (listed in the annex of this privacy notice, the "**Privacy Notice**") and S.A. Coca-Cola Services N.V. ("**CCS**") (collectively referred to as "**we**", "**our**" and "**us**" in this Privacy Notice, are committed to respecting your privacy.

This Privacy Notice tells how and why we are using your personal data, what we are doing to protect it and what you can do to manage your data and exercise your rights. This Privacy Notice is applicable to you who, for example as a consumer, a social media influencer, a journalist, a public official, or a stakeholder, you play a relevant role on issues which are important to us. Here you will find information about what data we process when interacting with you, for example at events and business meetings, when we correspond with you, or when you contact our Consumer Interaction Center about Coca-Cola products. It also tells you about what we do with your data if, for example, you are a relevant stakeholder in the community and we want to learn more about you to decide whether to engage with you in a meaningful way. This Privacy Notice is also applicable to you if, from the information that you make publicly available on social media (for example, you name, surname and pseudonym, number of followers/fans, demography of followers/fans -i.e. sex, age, location and interests, level of engagement and presence on social media platforms, social media accounts' URLs, contents published on social media), we profile you as a social media influencer and, based on this profile, we decide whether to offer you access to exclusive contents and products, invite you to events and meetings, propose sending you commercial communications, and/or offer you to enter into a commercial partnership.

- b. Coca-Cola entities established in the European Economic Area and listed in the annex of this Privacy Notice, are the independent controllers responsible for the processing of your personal data by our own respective employees described in this Privacy Notice. By exception, the processing of consumers' personal data for the purposes of answering their questions and queries, enforcing our terms and conditions, and defending/asserting our rights in the event of a litigation are under the responsibility of CCS, which qualifies as controller for these processing.

2. What personal data do we collect about you?

a. We may process the following personal data:

- **General information about yourself** (e.g. surname, first name, phone number, date of birth, country of location, spoken language)
- **Data pertaining to your professional life** (e.g. job title, professional phone number, postal address and email address, academic curriculum, link to your publicly accessible social media profile, business card, photos, videos and audio manifestly made public by you);
- **Data pertaining to your publicly available social media activities** (e.g. name, surname and pseudonym, positions and mentions about certain topics, number of followers/fans, demography of followers/fans -i.e. sex, age, location and interests, level of engagement and presence on social media platforms, social media accounts' URLs, contents published on social media);
- **Data pertaining to your participation to events and meetings organized by the Coca-Cola Group** (e.g. your contact details, registration as a guest, meal preferences, ID);
- **Information you provide to us when contacting the Coca-Cola Consumer Interaction Center** (e.g. your product experience) and your voice when **recorded for training and quality-assurance purposes**;
- **Information pertaining to your opt-out**;
- **Billing information** (e.g. billing address and account, payment information);
- **Information provided by third parties and data manifestly made public by you**;
- **Comments, questions and concerns** you express when contacting us.

b. We generally do not collect sensitive data, except for information that you have made manifestly public or information for which you have provided your explicit consent. For example, we may ask you to disclose to us information related to your health or medical condition when necessary to analyse and address incidents with our products or packaging. Furthermore, we will process such information if you communicate it to our agents during a call or you are voluntarily expressing your consent through a communication and / or any other means.

3. How do we collect your personal data?

- a. **Directly:** we collect personal data that you directly provide us, via a business card, orally, by post and/or by email, when you contact our Consumer Interaction Center regarding a product or commercial promotion.
- b. **Indirectly:** we may collect your personal data indirectly, i.e. from (i) individuals about whom we collect personal data who share with us your personal data, so that we may interact with you for the purposes described in this Privacy Notice, (ii) The Coca-Cola Company ("**TCCC**"), TCCC's subsidiaries, TCCC's affiliates, and entities engaged in the production and distribution of products and services under the Coca-Cola brands (the "**Coca-Cola Group**"), (iii) from publicly available sources or when you make your data manifestly public.

4. How do we use your personal data?

We use your personal data for the following purposes and relying on the following legal bases:

- a. Processing of data based on legitimate interest

In order to develop, maintain and improve our business relationship with you and strategically engage with you, it is in our legitimate interests, and yours, to process your personal data that is relevant to our interactions and communications with you. These may include, for example, inviting you to events and meetings; organizing scientific, cultural, educational, environmental, and/or leisure and health-related initiatives; sending you newsletters, proposals to complete surveys, promotional contents and targeted information regarding the image, product or brands of the Coca-Cola Group that may interest you. To this end, we tailor our communications with you to what we believe is of interest to you and we may add to our database the information we collect about you according, including but not limited to, your professional sector of activity, your connection to us and with our employees, our meetings with you, how we have known you, your workplace and your related professional contact information, your communications made manifestly public on social media and your position on topics that are important to us. We do not use your personal data in a way that may be detrimental to you and that may adversely impact you.

Notwithstanding the above, you have the right of opting out from receiving such communications and we will in this case process your personal data in order to interrupt the communications you wish to no longer receive. Furthermore, if you wish to be removed from our database, you can contact us at privacy@coca-cola.com and we will timely process your request.

We process personal data by gaining insights and information from social media listening tools, to handle, adequately and in a timely manner, customers' inquiries, comments, complaints and suggestions regarding Coca-Cola's products and services, made on social media channels. For example, we use social media listening tools also to monitor and analyse mentions from social media users about Coca-Cola products and services and corporate activities and issues, with the purpose of evaluating the general sentiment and engagement and identifying themes in conversations occurring within our community.

We may process your personal data for purposes of handling consumer requests, defending/asserting our rights and enforcing our terms and conditions, our contracts.

Finally, we may process your personal data to perform any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock, in line with our interest to conduct our corporate strategy.

When we rely on our legitimate interests for a given purpose, we do so because we believe our legitimate interests are not overridden by your interests or fundamental rights and freedoms.

b. Processing of data based on our legal obligations

We may process your personal data to comply with legal requirements.

c. Processing of data based on your consent

We may process, example, use your (i) contents published on social media and related to Coca-Cola brands and (ii) photographs to promote our brands and products (by publishing them), if you provide us your consent to do so.

d. Processing of data based on performance of contract

We may process your personal data to perform our contract with you if, for example, we have entered into a commercial partnership agreement with you to promote Coca-Cola brands and products.

5. **Marketing**

We collect and use personal data about individuals who access our brands' websites, apps and platforms, for marketing-related purposes and other purposes. You may access the privacy notices explaining this in detail on our relevant websites, apps and platforms.

6. **Cookies and similar technologies**

Our brands' websites, apps and platforms use cookies and similar technologies, for various reasons. You may access our cookie policy which explains this in detail on our relevant websites, apps and platforms.

7. **To whom are your personal data disclosed?**

We may disclose your personal, to the extent permitted or required under applicable laws and regulations, to the following categories of recipients:

- a. **Service providers, professional advisors and consultants** that perform services for us in the context of the purposes described in this Privacy Notice, which may include data hosting, mailing and emailing services, events' organisation, and payments processing
- b. **Entities of the Coca-Cola Group**, including company that bottle and distribute our products ("Bottlers") with which we may share your personal data to carry out the purposes described in this Privacy Notice.

- c. **Law enforcement, regulators and other parties for legal reasons**, i.e. to (a) comply with our legal obligations, (b) respond to requests from public and government authorities, (c) enforce our agreements, (d) exercise or protect our rights, privacy, safety and that of our affiliates, you, or others.

8. What are your rights with regard to the processing of your personal data?

You have the following rights in relation to our processing, which apply when certain conditions are met: **right of access, right of rectification, right to object, right to erasure, right to restriction, right to data portability**. Finally, you have a **right to lodge a complaint** with the relevant supervisory authority (in particular in the European Union Member State of your habitual residence, or place of the alleged infringement).

9. How can you contact us?

To exercise your rights, or to obtain further information about our privacy practices, you can:

- send us an email to the following address: privacy@coca-cola.com;
- call us on: please refer to the contact details of the relevant entity in the annex;
- write us to the following postal address: please refer to the contact details of the relevant entity in the annex;
- send an email to our **Data Protection Officer** (DPO) at the following address: DPO-Europe@coca-cola.com.

10. Storing and transferring your personal data

- a. **Data retention**: we do not keep your personal data for any longer than is necessary to fulfil the purpose for which we collected it, or to comply with any legal requirements, or to assert or defend against legal claims.
- b. **International transfers of personal data**. To achieve the purposes described in this Privacy Notice, we may transfer your personal data to countries that may not ensure an adequate level of data protection, such as the United States of America. In that case, our data transfers are subject to the following appropriate safeguards in accordance with the General Data Protection Regulation ("GDPR"), to guarantee that your personal data are adequately protected:
 - Standard data protection clauses adopted by the EU Commission under article 46 paragraph 2 of the GDPR (click [here](#) to access the EU Commission's decision on standard contractual clauses for transfers to processors established in third countries); and
 - EU-U.S. Privacy Shield for transfers to entities located in the United States (click [here](#) to access to the EU Commission's decision pertaining to the EU-U.S. Privacy Shield).

To obtain any relevant information regarding any transfers of your personal data to countries that do not ensure an adequate level of data protection (including the relevant transfer mechanisms), please contact us using the contact information provided in section 9.

Annex: List of Coca-Cola entities established in the EEA acting as independent controllers

Country	Coca-Cola entity	Contact details
United Kingdom	Beverage Services Ltd	1A, Wimpole Street, London, WIG OEA, United Kingdom
	Coca-Cola Holdings (United Kingdom) Limited	1A, Wimpole Street, London, WIG OEA, United Kingdom
	Coca-Cola Holdings Africa Limited	1A, Wimpole Street, London, WIG OEA, United Kingdom
	Coca-Cola International Sales Limited	1A, Wimpole Street, London, WIG OEA, United Kingdom
	Waters & Robson Holdings Ltd	1A, Wimpole Street, London, WIG OEA, United Kingdom
	Waters & Robson Ltd	1A, Wimpole Street, London, WIG OEA, United Kingdom
Ireland	European Refreshments (also called <i>Coca-Cola Ireland</i>)	Southgate, Dublin Road, Drogheda, Co Meath, Ireland Ground Floor, 2 Ballsbridge Park, Ballsbridge, Dublin 4, Ireland

Belgium	SA Coca-Cola Services NV	Bergensesteenweg 1424. Brussel, 1070, Belgium
	Minute Maid Juices sprl / bvba	Bergensesteenweg 1424. Brussel, 1070, Belgium
Netherlands	Coca-Cola Nederland BV	Watermanweg 20, 3067 GG Rotterdam, Netherlands
	Coca-Cola Holdings (Nederland) BV	Watermanweg 20, 3067 GG Rotterdam, Netherlands
Sweden	Coca-Cola AB	Dryckesvagen 2C, 13650 Haninge, Sweden
Norway	COCA-COLA NORGE AS	Robsrudskogen 5, PO BOX 460, Lorenskog N-1471, Norway
Iceland	Coca-Cola Icelandic Services RHF	Registered office via Attorneys at Hofdabakki, 9 Hofdabakki, 6th floor, 110 Reykjavik Iceland
France	Coca-Cola Services France	9 Chemin de Bretagne, 92130 Issy les Moulineaux, France
	Coca-Cola Midi S.A.S.	99 Avenue de Berlin BP 701 Parc d'Activités du plateau de Signes 83030, Toulon Cedex 9, France
	Varoise de Concentrés S.A.S.	99 Avenue de Berlin BP 701 Parc d'Activités du plateau de Signes 83030, Toulon Cedex 9, France
Germany	Coca-Cola GmbH	Stralauer Allee 4, 10245 Berlin, Germany
Denmark	Coca-Cola Nordic Services Aps	Philip Heymans Alle 17, DK2900 Hellerup, Denmark
Finland	Coca-Cola Finland Oy	C/O Sinebrychoff, Sinebrychoffinaukio 1/ Korkeavarasto (building), 04250 Kerava, Finland
Spain	Compañía de Servicios de Bebidas Refrescantes, S.L..	Calle Ribera del Loira 20-22, 28042 Madrid, Spain
Spain	Fundación Coca-Cola	Calle Ribera del Loira 20-22, 28042 Madrid, Spain
Spain	Refrescos Envasados, S.A.	Calle Ribera del Loira 20-22, 28042 Madrid, Spain
Austria	Coca-Cola GesmbH (Austria)	Am Europlatz 2, 1120 Vienna, Austria

Bulgaria	Coca-Cola Enterprises Bulgaria	1505 bul. Stinyakovo, Sofia, Bulgaria
Croatia	Coca-Cola Adria doo	Milana Sachsa 1, 10000, Zagreb, Croatia
Czech Republic	Coca-Cola Ceska Republika s.r.o.	198 21 Praha 9, Kyje, Ceskobrodska 1329, Czech Republic
Estonia	Coca-Cola Baltic Beverage	Mustamäe tee 16, 10617 Tallinn, Estonia
Greece	Coca-Cola Hellas S.A.	26 Kifissias Ave. & 2 Paradeissou St., 15125 Maroussi, Athens, Greece
Hungary	Coca-Cola Hungary Services Ltd.	2330 Dunaharaszti, Nemedi ut 104, Hungary
Italy	Coca-Cola Italia s.r.l.	Viale Tommaso Edison 110 – 20099 Sesto San Giovanni (MI) Italy
Latvia	Coca-Cola Baltic Beverage	Mustamäe tee 16, 10617 Tallinn, Estonia
Lithuania	Coca-Cola Baltic Beverage	Mustamäe tee 16, 10617 Tallinn, Estonia
Poland	Coca-Cola Poland Services Sp. z o.o.	Al. Armii Ludowej 26,00-609 Warszawa
Romania	Coca-Cola Romania SRL	1A Sos Buc-Ploiesti, Floor 2 Sector 1 Bucharest, 010616 Romania
Slovakia	Coca-Cola Slovakia s.r.o.	Tuhovska 1, 83006 Bratislava, Slovak Republic