

## GINEBRA SAN MIGUEL INC. PRIVACY STATEMENT

As of February 1, 2018

Ginebra San Miguel Inc. and its subsidiaries (“**GSMI**,” “**We**,” “**us**” or “**our**”) respect your privacy and will keep secure and confidential all personal and sensitive information that you may provide to GSMI, and/or those that GSMI may collect from you (“**Personal Data**”).

This privacy statement (“**Statement**”) provides for the Personal Data we obtain through this or any of our websites (“**Website**”, “**Websites**”), as well as from our appointed third-parties, in connection with transactions with our employees, affiliates, suppliers and other stakeholders.

Please read this Statement carefully to understand how We treat Personal Data, and the standards we observe in using, processing, keeping, securing, and disclosing said Personal Data.

We reserve the right to change the Statement, without prior notice to reflect change(s) in the law and/or our internal standards. When We do so, We will notify you by posting the updated Statement in this and our other Websites for your information and reference. Any changes to our Statement will become effective upon posting thereof in our Websites.

By accessing this Website and submitting your Personal Data, you expressly acknowledge that you have read, understood and hereby agree to all of the terms of this Statement and that you provide consent for us to:

- Process your Personal Data, as provided under applicable laws, regulations, and our policies, for our subsidiaries and for San Miguel Corporation (“**SMC**”) and its subsidiaries and affiliates, service providers, and other authorized third -parties’ legitimate purpose/s;
- Make your Personal Data available for our subsidiaries and affiliates, contractors, service providers, and other third parties as may be reasonably necessary for the conduct of our business.

### ***Personal Data We Collect and Process***

We collect Personal Data from you whenever you visit this or any of our Websites, or when you engage us in various transactions such as in applying for a position in any of our companies, completing a survey or questionnaire, participating in our events and other promotional activities, posting in any of our social media accounts, product inquiring or ordering, and voicing out your concerns.

The Personal Data that We collect will only be used for legitimate business interest as disclosed at the time your consent was obtained. We will not collect, process, utilize, disclose,

retain, or dispose Personal Data without your express consent, which may be either written or electronic.

We may ask you to provide Personal Data depending on the activity you are attempting to complete. These may include:

- Contact information: Name, Mailing address, Phone number, and Email address
- Resumé information: Employment and Educational history
- Identification information and Legal purchase age confirmation of your date of birth
- Interests, Preferences, and Consumption patterns
- Visual and audio recordings in our events

Any additional Personal Data that you may provide through your correspondences with Us in connection with any transaction shall also be considered and treated as Personal Data.

When you navigate through and interact with any of our Websites, depending on your settings, We may use automatic data collection technologies (e.g., cookies, web beacons, small data text files, or similar technologies) to obtain certain information about your equipment, browsing actions, and patterns, such as:

- Details of your visits to any of our Websites (e.g., traffic data, location data, logs, and other communication data, and the resources that you access and use on any of our Websites;
- Information about your computer/device and internet connection, as well as IP address, operating system, and browser type (collectively, “**Collected Data**”).

The Collected Data are mostly statistical data, but may include other Personal Data that We ask you to provide GSMI in connection with your engagement, activity or transaction with us or your concern or query.

You may choose not to provide any or all Personal Data that We are requesting. However, it is possible that you may not be able to complete the desired engagement, activity, or transaction with Us or that We may not be in a position to effectively address your concerns or query.

#### What We Do with Personal Data and Collected Data

Upon receiving your Personal Data, GSMI or its duly authorized third party forwards the same to the concerned GSMI department. GSMI may use your Personal Data to get in touch with you, in order to attend to, further inquire about, address, and confirm action on your

engagement, activity, or transaction with us. GSMI may separately contact you to ask you for further feedback, request your participation in surveys, and/or provide information on its products and services. GSMI may use your Personal Data to respond to your requests or questions, evaluate your job application, to improve our products and services, for security purposes, for marketing purposes (in the case of marketing-related emails or communications, we will provide you with a method to opt out of receiving further marketing materials or with a method to opt in if required by law). We use your Personal Data as otherwise permitted by law or as we may notify you.

For the Collected Data, We use them to help us monitor and protect the security of the Websites, improve our Websites and to deliver a better and more personalized service by enabling us, among others, to:

- Estimate our audience size and usage patterns;
- Store information about your preferences, allowing us to customize our Websites according to your individual interests;
- Speed up your searches;
- Recognize you when you return to our Websites.

### **Website Visitor Under the Age of 18**

No one under the age of eighteen (18) (“**Minors**”) may provide any Personal Data in any of our Websites, participate in our surveys, events, and promotional activities, post in any of our social media accounts, or order our products. GSMI does not knowingly collect Personal Data from Minors. If you are a Minor, please do not use or provide any information on any of our websites about yourself.

### **Security of your Personal Data and the Collected Data**

We have implemented reasonable and appropriate technical, organizational, and physical measures designed to protect the confidentiality, integrity, and safety of your Personal Data and Collected Data and secure such information from destruction, unauthorized access, alteration, disclosure, fraudulent misuse and/or any other unlawful processing, as well as other natural and human dangers. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to our Websites; any transmission is at your own risk. However, upon receipt of your Personal Data, We will strictly implement security procedures and use security features to try to prevent unauthorized access.

Our Websites may have social media features or may have links to our accounts on social networks. Our media accounts are widely accessible, and your posts and comments may be visible to the public, depending on your privacy settings. We do not control nor operate such platforms and your accounts are governed by the privacy policies of the entities providing or

operating them. Accordingly, the manner in which your personal information is treated by the said entities is not our responsibility.

For the avoidance of doubt, We expressly disclaim any representation or warranty (express or implied) with respect to ensuring or guaranteeing the security of your Personal Data.

### **Accessing and Correcting Your Personal Data**

You are entitled to certain rights in relation to the Personal Data collected from you. Among others, you have the right to inquire about, access and rectify your Personal Data and object on legitimate grounds to its processing. You can exercise those rights by contacting our Data Protection Officer. You also have the right to lodge a complaint before the National Privacy Commission in case of violation of your privacy rights. However, please be advised that we cannot delete your Personal Data without restricting or removing our ability to effectively address your concerns. We may not accommodate a request to correct and/or delete Personal Data if We believe the same would violate any law or legal requirement or cause the Personal Data to be incorrect.

### ***Disclosure and Sharing of Personal Data and Collected Data***

We may disclose aggregated information about our users, and information that does not identify, or when combined with other information, does not directly and certainly identify any individual, without restriction.

We may disclose and share the Personal Data and Collected Data, subject to compliance with applicable laws and regulations, on a need to know basis, and in all cases only for legitimate business purposes, as follows:

- To our subsidiaries and SMC subsidiaries and affiliates;
- To contractors, service providers, and other third parties We engage to support our business, and who are bound by contractual obligations to keep Customer Information and Collected Data confidential, and use it only for the purposes for which We disclose to them;
- To government and law enforcement agencies and regulatory bodies;
- To comply with orders of courts, government agencies, regulatory bodies, stock exchanges and with applicable laws and regulations;
- If We believe disclosure is necessary or appropriate to protect the rights, property, or safety of GSMI, our subsidiaries and affiliates, officers, employees, customers, or other third parties;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of GSMI's assets,

whether as a going concern or in an unlikely event, as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by GSMI about our Website users is among the assets transferred; and

- To conduct investigations of breaches of GSMI's internal policies, laws, and regulations, enforce appropriate sanctions, and pursue legal actions, if necessary.
- To share information for other reasons we may describe to you from time to time.

### **Third-Party Use of Cookies and Other Tracking Technologies**

Some content or applications, including advertisements, on our Websites are served by third-parties, including servers, content providers, and application providers. These third parties may use cookies (alone or in conjunction with web beacons or other tracking technologies) to collect information about you when you use any of our Websites. The information they collect may be associated with your Personal Data, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about other targeted content, you should contact the responsible provider directly.

### ***Retention of Personal Data and Collected Data***

GSMI and/or its duly authorized third party shall retain the Personal Data and Collected Data for as long as necessary to fulfill the purpose for which it was collected, or as required by relevant laws. After which, We shall undertake measures to properly dispose of any and all copies of the Personal Data and Collected Data.

### ***Miscellaneous***

If any part of the Statement is determined to be invalid or unenforceable pursuant to applicable law, then the invalid or unenforceable provision will be deemed superseded by a valid, enforceable provision that most closely matches the intent of the original provision and the remainder of the Statement shall continue in force and effect.