

**PRIVACY STATEMENT FOR THE
2020 REGULAR ANNUAL STOCKHOLDERS' MEETING
OF GINEBRA SAN MIGUEL INC. (2020 RASM)**

Ginebra San Miguel Inc. (“GSMI”, “we”, “us” or “our”) respects your privacy and will keep secure and confidential all personal information and sensitive personal information (collectively, “**Personal Data**”) that you may provide to GSMI and/or those that GSMI may collect from you, pursuant to Republic Act No. 10173 or the Data Privacy Act of 2012, the implementing rules, regulations and issuances by the National Privacy Commission (collectively, “**Privacy Laws**”), and the relevant policies of GSMI.

What Personal Data Is and What Personal Data We Collect from You: In connection with your participation in the 2020 RASM, we need to process your Personal Data and that of individuals other than yourself (collectively, “**you**,” “**your**”) including, but not limited to, name, postal address, contact numbers, email address, government-issued ID with photo, and signature.

GSMI collects the Personal Data through the accomplished ballot, proxy and questions forms, as well as other documents relevant to the 2020 RASM, which you provided to us.

Why We Collect Your Personal Data: We will use the Personal Data for the purposes of verifying your identification as a stockholder, communicating with you about your participation in the 2020 RASM, counting your attendance, and determining quorum (where applicable) and voting results, processing your question or comment in connection with or during the 2020 RASM, as well updating your records as a stockholder.

To Whom We Disclose Your Personal Data: Your Personal Data may be disclosed to our stock transfer agent, SMC Stock Transfer Service Corporation (“SMC-STSC”), our parent companies, subsidiaries, affiliates, contractors and service providers, and government and regulatory agencies (including a stock exchange), subject to compliance with applicable laws and regulations, on a need to know basis, and in all cases only for the purposes stated in this Privacy Statement (“Statement”) and/or for other legitimate business purposes.

How We Secure Your Personal Data: We have implemented technical, organizational, and physical measures designed to protect the confidentiality, integrity, and availability of your Personal Data and to secure such Personal Data from unauthorized destruction, access, alteration, disclosure, fraudulent use and/or any other unlawful processing, and other natural and human dangers.

We shall retain your Personal Data for, and dispose it after, a period of five (5) years or such longer period as may be required for reasonable cause or under applicable laws, rules and regulations or our policies on records and retention.

What Your Rights are as a Data Subject: You are afforded certain rights in relation to your Personal Data under the Privacy Laws. You have the right to (i) be informed of these specific rights, (ii) object to the processing of your Personal Data, (iii) access, update, correct, erase or block your Personal Data, (iv) withdraw your consent and/or edit your consent preferences at any time and (v) lodge a complaint before the GSMI Data Protection Officer or the National Privacy Commission in case of violation of your rights as a data subject.

Should you need to access or update your Personal Data, you may do so by sending an email to us at dpo@ginebra.sanmiguel.com.ph and SMC-STSC at smc_stsc@sanmiguel.com.ph. Please be advised, however, that we cannot delete Personal Data which shall restrict or remove our ability to effectively handle or execute transactions related to your shareholdings with GSMI. Also, we may not be able to accommodate a request to correct and/or delete Personal Data if we believe the same will violate any law or legal requirement or cause the Personal Data to be incorrect. In all requests relating to your Personal Data, we will verify your identification to protect your Personal Data.

Consent of Participants to the Meeting: By indicating your personal information in the relevant forms and documents that you submitted to us, you authorize GSMI, SMC-STSC, our parent companies, subsidiaries, affiliates, contractors and service providers, and government and regulatory agencies (including a stock exchange), to collect and process your Personal Data pursuant to this Statement.

Should you have any questions and/or concerns regarding this Statement, GSMI's use of your Personal Data, or your rights in relation to your Personal Data under the Privacy Laws, please do not hesitate to contact the Office of the Data Privacy Officer at dpo@ginebra.sanmiguel.com.ph.