

**PRIVACY STATEMENT FOR THE  
REGULAR STOCKHOLDERS' MEETING  
OF GINEBRA SAN MIGUEL INC. ON  
MAY 27, 2021**

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 Regular Stockholders’ Meeting, we need to process your Personal Data and that of individuals other than yourself (collectively, “**you**,” “**your**”) including, but not limited to, name, address, contact numbers, email address, government-issued ID with photo, and signature. Your voice or image may also be captured and recorded during the proceedings of the Regular Stockholders’ Meeting.

GSMI collects the Personal Data through the accomplished ballot, proxy, and questions forms, as well as other documents relevant to the Regular Stockholders’ Meeting, which you provided to us, and through the audio and video recording during the Regular Stockholders’ Meeting.

**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 Regular Stockholders’ Meeting, registering, counting your attendance and determining quorum (where applicable) and voting results, processing your question or comment in connection with or during the Regular Stockholders’ Meeting, as well as updating your records as a stockholder.

Your Personal Data is also processed to allow us to comply with our legal obligations and regulatory requirements, or where we have legitimate interest to process the Personal Data so that we can communicate effectively with our stockholders.

**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). Your Personal Data may also be disclosed to the public when there is a legal or regulatory requirement to do so, such as uploading the Minutes of the Regular Stockholders’ Meeting to our website.

We ensure that all disclosures of Personal Data will be 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](mailto:dpo@ginebra.sanmiguel.com.ph) and SMC-STSC at [smc\\_stsc@sanmiguel.com.ph](mailto: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.

**Changes to this Statement.** From time to time, we may change or update our relevant policies to comply with Privacy Laws and other legal, government or regulatory requirements, adapt to new technologies and protocols, align with accepted industry practices or for other legitimate purposes.

**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](mailto:dpo@ginebra.sanmiguel.com.ph).*