

PHOENIX BEVERAGES LIMITED

GENERAL PRIVACY NOTICE

1. Introduction

- 1.1 In this General Privacy Notice, 'PBL' refers to Phoenix Beverages Limited and all the words and expressions used in this Privacy Notice shall be interpreted and construed in line with the definitions used in PBL's General Data Protection Policy.
- 1.2 This General Privacy Notice should be read and interpreted in conjunction with and subject to PBL's General Data Protection Policy that governs all the personal data processing activities of PBL.
- 1.3 This General Privacy Notice is relevant to all persons ('data subjects') whose personal data is collected by PBL in line with the requirements of the European General Data Protection Regulation 2016 ('GDPR') and the Mauritius Data Protection Act 2017 ('DPA').
- 1.4 Users of PBL's website as well as PBL's customers and potential customers are likely to be data subjects in as much as PBL may collect their personal information whether by automated or non-automated means.

2. Responsibilities

- 2.1 PBL is responsible for ensuring that this General Privacy Notice is made available to data subjects prior to PBL collecting/processing their personal data. This General Privacy Notice is therefore readily available for inspection on our website. For further information, you may contact our Data Protection Officer as set out in paragraph 3.1.6 below.
- 2.2 All Employees of PBL who interact with data subjects are responsible for ensuring that:
 - 2.2.1 this General Privacy Notice is drawn to the data subject's attention prior to processing the latter's personal data; and
 - 2.2.2 they obtain the consent of the data subjects prior to the processing of their data wherever consent is required under either the GDPR or the DPA.

3. Privacy Statement

3.1 Who is PBL and what does PBL do?

3.1.1 PBL is a public company duly registered and validly existing under the laws of Mauritius and is listed on the Stock Exchange of Mauritius.

3.1.2 PBL has its registered office situated at Pont Fer, Phoenix and its administrative headquarters situated at 4th Floor IBL house, Port Louis. PBL's other contact details are as follows:

Telephone Number(s): 601 2000

Email address: rnarayya@phoenixbev.mu

3.1.3 As a leading beverage company, PBL operates 3 (three) production plants in Mauritius, sells and distributes a wide range of alcoholic and non-alcoholic beverages, produces and sells international brands and is the authorized bottler of the Coca-Cola Company.

3.1.4 Although established, based and domiciled in Mauritius, PBL has expanded its business activities beyond the jurisdiction of Mauritius including but not limited to parts of the European Union.

3.1.5 In the light of paragraph 3.1.4 above, PBL is likely to process personal data both under the GDPR and the DPA.

3.1.6 The Management of PBL has appointed a Data Protection Officer in Mauritius whose identity and contact details are as follows:

Name: Mrs Preethvi Sewraj-Gooljar

Postal address: Phoenix House, Pont Fer, Phoenix

Email address: pgooljar@phoenixbev.mu

Telephone No.: 6012000; 6012294

Mobile No.: 5422 0350

3.1.7 The personal data PBL is likely to collect from you and process is:

(a) If you are a user of PBL's website is fully explained in our Website User Privacy Policy.

(b) If you are a customer or potential customer of PBL:

- National ID or passport of owner
- Certificate of incorporation for a company
- Business Registration Certificate
- Company Business address
- Personal Home address for rented or leased business
- Trade licence from Municipality or District council
- Alcohol permit delivered by the MRA

3.1.8 The personal data PBL collects will be used for the following purposes and legal basis:

- (a) If you are a user of PBL's website, the purposes and legal basis are fully explained in our Website User Privacy Policy.
- (b) If you are a customer or a potential customer of PBL:
 - (i) For the preparation of offers of goods and/or services as per your request/s;
 - (ii) For the preparation of quotes for the provision of goods and/or services as per your request/s;
 - (iii) For the preparation of contracts for the provision of goods and/or services as per your request/s; and/or
 - (iv) For the preparation of credit facility agreements for the provision of goods and/or services as per your request/s.

3.1.9 Also, PBL's premises may be equipped with CCTV systems. Such measures are not intended to be intrusive as PBL's aim is merely to provide additional security to users of its premises. Furthermore, such measures are necessary for the prevention and detection of unlawful acts and doings thereby protecting the vital interests of individuals and the legitimate interests of PBL.

3.1.10 In any event, PBL is committed to ensuring that the information it collects and use is appropriate for the purpose for which it was collected, and does not constitute an invasion of your privacy.

3.1.11 In terms of being contacted for marketing purposes PBL will contact you for additional consent.

3.1.12 PBL's aim is not to be intrusive, and PBL undertakes not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure.

3.2 Consent

3.2.1 By using PBL's website (as a user of PBL's website) you are giving PBL permission to process your personal data specifically for the purposes identified above and as more fully explained in our Website User Privacy Policy.

3.2.2 By placing an order for goods and/or services with PBL (as a customer) or by requesting PBL to provide you a quote (or any further information) in respect of PBL's goods and/or services (as a potential customer), you are giving PBL

permission to process your personal data specifically for the purposes identified above.

- 3.2.3 Subject to paragraph 3.2.7 below, further explicit and written consent will be requested from you for PBL to process any of your sensitive or special categories data.
- 3.2.4 Sensitive or special categories of personal data is information about racial origin, ethnic origin, political opinion, religious belief, philosophical belief, trade union membership, genetic data, biometric data, health data, criminal record, data concerning sex life and/or sexual orientation.
- 3.2.5 Where asking you for sensitive or special categories of personal data PBL will always tell you why and how the information will be used.
- 3.2.6 When you have been requested to and do submit written explicit consent, you may withdraw consent at any time by informing PBL and/or PBL's Data Protection Officer in writing of your wish to withdraw your consent without having to assign any reason for your decision.
- 3.2.7 PBL may exceptionally process sensitive or special categories personal data without your consent if such processing is required by law and/or a Court order or where the information is already in the public domain.

3.3 Disclosure and transfer

- 3.3.1 PBL may pass your personal data on to third-party service providers contracted to PBL in the course of dealing with you. Any third parties that PBL may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on PBL's behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with PBL's procedures.
- 3.3.2 Basically, PBL will not pass on your personal data to third parties unless it has obtained your consent or such disclosure is necessary for the processing activities of PBL in furtherance of a contractual relationship to which you are privy as a customer or potential customer of PBL or from which you will be deriving a personal interest.
- 3.3.2 PBL will not transfer your personal data to a different country without having carried out an adequacy test as explained in PBL's General Data Protection Policy and informed you about the adequacy of protection afforded to your personal data in that country.

3.4 Report of Breach

Whenever PBL is on notice that a breach of personal data has been committed or reasonably suspects that a breach of personal data is likely to be committed, PBL shall as soon as reasonably practicable inform the relevant supervisory authority about the same. You shall also be informed about the same where such a breach is likely to impact on your rights and freedoms as a data subject.

3.5 Retention Period

- 3.4.1 Subject to paragraph 3.4.2 below, PBL will process and store your personal data for no longer than is required for the purpose for which it is initially collected.
- 3.4.2 Notwithstanding paragraph 3.4.1 above, PBL may store your personal data for such period as may be necessary for PBL's compliance with legal obligations and for PBL's legitimate interests such as the defense by PBL of legal claims that may be brought before it.

3.6 Your rights as a data subject

At any point while PBL is in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that PBL holds about you.
- Right of rectification – you have a right to correct data that PBL holds about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data PBL holds about you to be erased from its records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data PBL holds about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that PBL refuses your request under rights of access, PBL will provide you with a reason as to why. You have the right to complain as outlined in clause 3.7 below.

3.7 Complaints

- 3.7.1 In the event that you wish to make a complaint about how your personal data is being processed by PBL, or how your requests under clause 3.6 above have been handled, you have the right to lodge a complaint directly with the relevant supervisory authority and PBL's Data Protection Officer.

3.7.2 The supervisory authority in Mauritius is the Data Commissioner of the Mauritius Data Protection Office whose contact details are as follows:

Postal address: Data Protection Office
5th Floor, Sicom Tower,
Wall street, Ebene

Telephone number(s): 460 0253

Email address: dpo@govmu.org

3.8 What does PBL hold about you?

3.8.1 At any point in time, you can find out the personal data that the organisation holds about you, if any.

3.8.2 Upon a written request being received, PBL can confirm what information it holds about you and how it is processed.

3.8.3 If PBL does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the European Union.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of PBL or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If PBL intends to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. Please note that the European Union has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, PBL will ensure there are specific measures in place to secure your information by carrying out an adequacy test as explained in PBL's General Data Protection Policy
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.

- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the relevant supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

3.8.4 When making a written request to PBL pursuant to this clause 3.8, you will need to provide to PBL an appropriate form of ID in order to access to the information set out at paragraph 3.8.3 above. An appropriate form of ID is either you National Identity Card or your passport (provided the same has not expired).

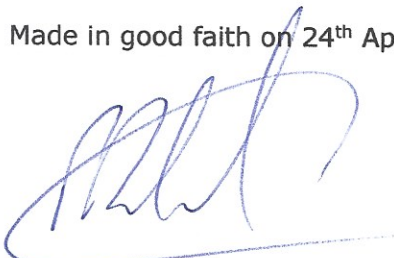
Ownership and Authorisation

Phoenix Beverages Limited is the owner of this document.

This document may, from time to time, be reviewed in line with any changes in the PBL's General Data Protection Policy and the law.

This Privacy Notice been duly approved by order of the Management of Phoenix Beverages Limited on 24th April 2019.

Made in good faith on 24th April 2019 at Pont Fer, Phoenix, Republic of Mauritius.



Mr. Patrick RIVALLAND
Chief Finance Officer/Chief Operating Officer
Phoenix Beverages Limited