
PHOENIX BEVERAGES LIMITED
WEBSITE USER PRIVACY POLICY

INTRODUCTION:

- A. We, at Phoenix Beverages Limited, understand that your privacy is important to you and that you care about how your personal data is used and shared online.
- B. We respect and value the privacy of everyone who visits this website (“Our Site”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the relevant laws.
- c. Please read this Website User Privacy Policy carefully and ensure that you understand it. Your acceptance of our Website User Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Website User Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Website User Privacy Policy, the following terms shall have the following meanings:

“Applicable Laws”	means the Data Protection Act 2017 of the Republic of Mauritius which is in force since 15 January 2018 and the General Data Protection Regulation of the European Union which is in force since 25 May 2018 and also includes the regulations and directives which may, from time to time, be made pursuant to the said legislations;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of our site and/or when you use certain features of our site. Details of the Cookies used by Our site are set out in section 13, below;
“Cookie Laws”	means the all relevant provisions of the Applicable Laws pertaining to privacy and electronic communications currently in force and as may be amended from time to time;
“Personal data”	means any and all data that relates to an identifiable person who can be directly or indirectly identified from

that data. In this case, it means personal data that you give to us via Our site. This definition shall, where applicable, incorporate the definitions provided in the Applicable Laws; and

“We/Us/Our”

means Phoenix Beverages Limited, a limited company duly registered and validly existing under the laws of the Republic of Mauritius, whose head office is situated at Pont Fer, Phoenix, Mauritius.

2. Information About Us

2.1 Our Site is owned by Us and operated by Phoenix Beverages Limited.

2.2 Our VAT Registration Number is 20004959.

2.3 Our Business Registration Number is C07001183.

2.4 Our Contact Details are as follows:

Postal address: Pont Fer, Phoenix

Email address: rnarayya@phoenixbev.mu

Telephone numbers: 601 2000

2.5 Our duly appointed Data Protection Officer is Mrs. Preethvi Sewraj-Gooljar whose contact details are as follows:

Postal address: Pont Fer, Phoenix

Email address: pgooljar@phoenixbev.mu

Telephone numbers: 601 2000; 60102294

3. What Does This Website User Privacy Policy Cover?

This Website User Privacy Policy applies only to your use of Our site. Our Site may contain links to other websites. Please note that we have no control over how your personal data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any personal data to them.

4. Your Rights

- 4.1 As a data subject, you have the following rights under the Applicable Laws, which this Website User Privacy Policy and our use of personal data have been designed to uphold:
- 4.1.1 The right to be informed about our collection and use of your personal data;
 - 4.1.2 The right of access to the personal data we hold about and/or in respect of you (see section 12);
 - 4.1.3 The right to rectification if any personal data we hold about you is inaccurate or incomplete (please contact us using the details in section 2 above and in the manner set out in section 14 below);
 - 4.1.4 The right to be forgotten – i.e. the right to ask us to delete any personal data we hold about you (we only hold your personal data for a limited time, as explained in section 6 but if you would like us to delete it sooner, please contact us using the details in section 2 above and in the manner set out in section 14 below);
 - 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
 - 4.1.6 The right to data portability (obtaining a copy of your personal data for re-use with another service or organisation);
 - 4.1.7 The right to object to us using your personal data for particular purposes; and
 - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 2 above and in the manner set out in section 14 below and we will do our best to solve the problem for you. If we are unable to help and you believe that we are not acting in compliance with the Applicable Laws, you also have the right to lodge a complaint with any of the data protection supervisory authorities existing from time to time under the Applicable Laws. In the Republic of Mauritius, the data protection supervisory authority is the Data Protection Commissioner of the Data Protection Office.

5. **What Data Do We Collect?**

Depending upon your use of Our Site, we may collect some or all of the following personal and non-personal data (please also see section 13 on our use of Cookies and similar technologies):

- 5.1 Name;
- 5.2 Business/company name
- 5.3 Job title;
- 5.4 Profession;
- 5.5 Contact information such as email addresses and telephone numbers;
- 5.6 Demographic information such as postcode, preferences, and interests;
- 5.7 IP address;
- 5.8 Web browser type and version; and
- 5.9 A list of URLs starting with a referring site, your activity on Our Site.

6. **How Do We Use Your Data?**

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) or purpose(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the Applicable Laws at all times. For more details on security see section 7 below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data or because it is in our legitimate interests according to the Applicable Laws. Specifically, we may use your data for the following purposes:
 - 6.2.1 Providing and managing your access to Our Site;
 - 6.2.2 Personalising and tailoring your experience on Our Site;
 - 6.2.3 Supplying our services to you (please note that we require your personal data in order to enter into a contract with you);
 - 6.2.4 Personalising and tailoring our services for you;

- 6.2.5 Replying to emails from you;
- 6.2.6 Market research; and/or
- 6.2.7 Analysing your use of Our Site and gathering feedback to enable us to continually improve Our Site and your user experience;
- 6.3 Where permitted under the Applicable Laws, we may also use your data for marketing purposes which may include contacting you by email, telephone, text message or post with information, news and offers on our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the Applicable Laws.
- 6.4 Third parties whose contents appear on Our Site may use third party Cookies, as detailed below in section 13 below. Please refer to section 13 below for more information on controlling Cookies. Please note that we do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.
- 6.5 You have the right to withdraw your consent, wherever the same has been obtained, to us using your personal data at any time and to request that we delete it.
- 6.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) or purpose(s) for which it was first collected.

7. How and Where Do We Store Your Data?

- 7.1 We only keep your personal data for as long as we need to in order to use it as described above in section 6 above.
- 7.2 Some or all of your data will be stored in the relevant jurisdiction of the Applicable Laws. You are deemed to accept and agree to this by using Our Site and submitting information to us. If we do store data outside the jurisdictions of the Applicable Laws, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be under the Applicable Laws.
- 7.3 Data security is very important to us, and to protect your data we have taken all suitable technical and operational measures to safeguard and secure data collected through Our Site.

8. Do We Share Your Data?

- 8.1 Subject to sections 8.2 and 8.4 below, we will not share any of your data with any third parties for any purposes.
- 8.2 In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal obligations, a court order, or a governmental authority.
- 8.3 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the Applicable Laws.
- 8.4 We may sometimes use third party data processors that are located outside of the jurisdictions of the Applicable Laws. If ever we transfer any personal data outside those jurisdictions, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be under the Applicable Laws.

9. What Happens If Our Business Changes Hands?

- 9.1 We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Website User Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by us.
- 9.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

10. How Can You Control Your Data?

- 10.1 When you submit personal data via Our Site, you may be given options to restrict our use of your data. In particular, we aim to give you strong control on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).

10.2 You may also wish to sign up to one or more of your preferred services. These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

11. Your Right to Withhold Information

11.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

12. How Can You Access Your Data?

12.1 You have the right to ask for a copy of any of your personal data held by us (where such data is held). We require the payment of a nominal fee which will not exceed MUR Rs [amount] for such service. Please contact our Data Protection Officer for more details.

13. Our Use of Cookies

13.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our services. By using Our Site, you may also receive certain third-party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than us. Third party Cookies are used on Our Site for tracking and analytics. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how people use Our Site.

14. Contacting Us

14.1 If you have any questions about Our Site or this Website User Privacy Policy, please contact our Data Protection Officer through the Contact Details set out in section 2.5 above. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you (as under section 12 above).

15. Changes to Our Website User Privacy Policy

15.1 We may change this Website User Privacy Policy from time to time (for

example, if there are changes in the Applicable Laws). Such changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Website User Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

Document Owner and Approval

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 Phoenix Beverages Limited's General Data Protection Policy and the law.

This Website User Privacy Policy been duly approved by order of Management on 24th April 2019.

Made in good faith at Pont Fer, Phoenix, Republic of Mauritius.



Patrick Rivalland
Chief Finance Office/Chief Operations Officer
Phoenix Beverages Limited