

PRIVACY POLICY - HEINEKEN PCD GREEN DOOR

1. General

This Privacy Policy applies to the HEINEKEN remote access portal commonly referred to as the 'HEINEKEN PCD Green Door' available via greendoor.heiway.net ("Portal") where we, HEINEKEN Supply Chain B.V. and its Subsidiaries and/or Affiliates will collect certain personal information.

Please read this Privacy Policy carefully as it contains important information to help you understand our practices regarding any personal information that you give to us or that we collect otherwise in the context of the Portal ('Personal Data').

HEINEKEN Supply Chain B.V. ('we', 'our' or 'us') is the controller of the Personal Data collected and processed. We respect your privacy, and we are committed to keeping your Personal Data secure and managing it in accordance with our legal responsibilities under applicable data protection laws.

2. What Personal Data We Collect and For What Purposes We Use your Personal Data

a. *Authentication to our Portal*

Having an account is necessary for using the Portal. Before you can enter our Portal, you will receive an invitation per email to follow our procedure to log-on to our Portal with your business email address and password (Single Sign On). For this, a guest account is created in the HEINEKEN Azure Active Directory. Only your name and business email are stored with this guest account. After completing this procedure, the guest account is replicated to the Portal whereafter you can log-in using Single-Sign-On functionality. We process this Personal Data as it is necessary to do so to provide contractually agreed services and to operate, improve, customise, and support our services based on our legitimate interest, or to comply with a legal obligation to which we may be subject.

b. *Auditing and forensics*

When using the Portal we collect information, including with cookies and similar technologies, for auditing and forensics purposes (for example in case of a security incident). The information we collect for these purposes is currently restricted to your IP address and type of internet browser, the HEINEKEN PCD System(s) which you connect to (IP, Protocol, Session Length, Bytes transferred). We process these Personal Data as this is necessary in light of our legitimate interests, or to comply with a legal obligation to which we may be subject, such as the NIS 2 Directive (Directive (EU) 2022/2555).

3. How We Share Your Personal Data

We will share Personal Data with our service provider Secomea and other third parties to help us provide services and products to you and to run our Portal. These third parties are:

- Our service provider Secomea (Denmark) who processes Personal Data on our behalf in the context of the Portal. Secomea is located in in the European Union. All Personal Data is stored inside the European Union. We have agreed with Secomea that appropriate measures are in place to protect the confidentiality and security of the Personal Data;

- In case HEINEKEN sells all or some of the assets or shares of a HEINEKEN group company to which Personal Data was transferred to a third party, your Personal Data may be provided to this third party;
 - We may also need to provide Personal Data to law enforcement bodies in order to comply with any legal obligation or court order.
 - In addition, we may use, disclose or transfer your information to a HEINEKEN group company in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- Security of Personal Data

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know and subject to a duty of confidentiality.

- Retention of Your Personal Data

We will retain your account details for as long as you actively use your account. After a two-year period of inactivity, we will delete your account. To request for deletion of your account, please contact pcdsecurity@heineken.com. We will take reasonable steps to destroy or de-identify Personal Data we hold if it is no longer needed for the purposes set out above or after the expiration of the defined retention term.

- Your choices and rights

If you would like to submit a request to access, rectify, erase, restrict or object to the processing of personal data that you have previously provided to us, or if you would like to submit a request to receive an electronic copy of your personal data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact us pcdsecurity@heineken.com. We will respond to your request consistent with applicable law.

In your request, please make clear what personal data you would like to access, rectify, erase, restrict or object to its processing. For your protection, we may only implement requests with respect to the personal data associated with your account, your email address or other account information that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable. Please note that if you make use of (some of) your choices and rights, you may not be able to use, in whole or in part, our Portal anymore. You also have the right to file a complaint about personal data protection with your local data protection authority.

- Contact

If you wish to exercise any of your rights listed above, you can contact us at pcdsecurity@heineken.com. Please note that we may request proof of identity. If you have any other question, objection to our use of your Personal Data or a complaint about

this Privacy Policy or about our handling of your Personal Data, you can e-mail pcdsecurity@heineken.com.

- Updates

We will keep this Privacy Policy under review and make updates from time to time. Any changes to this Privacy Policy will be posted on our Portal and to the extent reasonably possible, will be communicated to you.

The most recent version of this Privacy Policy is dated: November 2023