

PRIVACY POLICY FOR BUDSTART PROGRAM WEBSITE

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This internet website (the “Website”), which is owned and operated by **ANHEUSER-BUSCH INBEV SA/NV**, a company organized and existing under the laws of Belgium, having its registered office at Grote Markt 1, 1000 Brussels, Belgium, registered with the Register of Legal Entities under company number VAT 0417.497.106 RPM Brussels and its Affiliates (“ABI”, “we”, “our” or “us”).

To ensure that you feel safe and happy visiting and using our Website, the following information gives you a comprehensive guide as to what we do with your personal data and more specifically how we collect, use and pass on your personal data when you use this Website.

This Privacy Policy describes, how your personal data are secured and how you can contact us about our privacy practices, including:

1. Data collection: What information do we collect?
2. For which purposes do we use your information and on which legal bases?
3. How do we share your information?
4. What are your rights?
5. Who can you contact in case you have questions or requests? The data protection contact point
6. Links to Third-Party Sites
7. Not Using Cookies And Similar Technologies
8. International Transfers
9. Security
10. Children’s Privacy
11. Changes to this Privacy Policy

Please read this Privacy Policy before using or submitting any personal data on this Website.

By accessing and using this Website, you confirm that you have read and that you understand the way we collect, process, use and disclose your personal data as described herein.

Please note that before using or submitting personal data on certain sections or form (for example the BudStart Application Form) of this Website, you may be asked to confirm electronically your understanding and acceptance of this Privacy Policy by submitting your information. Your affirmative action in clicking on the button “submit or send” and your use of this Website signify that you understand and agree to the collection, processing, use and transfer of your personal data as described in this Privacy Policy.

Our records of your acceptance of this Privacy Policy, the date thereof, and of all future amendments to this Policy, shall be regarded as conclusive and written evidence of your consent.

1. DATA COLLECTION: WHAT INFORMATION DO WE COLLECT?

Depending on the purpose of the processing, we need to process the following categories of personal data about you:

- your **personal details** (for example, your name) which you are asked to provide, e.g. if you register to participate on the BudStart Program on this Website;
- your **contact details** (for example, your e-mail address, phone number), e.g. if you register for our newsletter or if we need to communicate with you in relation to participate on the program you have requested;
- **commercial and technical** information (for example, organization name, designation, presence, details of what your company does, if you have subscribed to our newsletter, participated to a competition, BudStart program or survey);

Remember that, when we ask you to fill in your personal data to give you access to participate in any program of the Website, we will mark certain fields as compulsory, since this information is necessary to be able to give you admission to the program, to evaluate and contact you. Please take into account that, if you decide not to make such data available to us, you may be unable to complete your registration or application.

2. FOR WHICH PURPOSES DO WE USE YOUR INFORMATION AND ON WHICH LEGAL BASES?

The Website main purpose is to inform applicants about all the details of the BudStart Program, and facilitate their application through this website.

We will process your personal data for the following purposes, as justified on the following legal bases:

PURPOSE	LEGAL BASIS
To manage your registration on the Website to enroll into Budstart Program.	Your personal data will be processed because the processing is necessary for the entering, or taking steps to enter into a contract with you at your request.

We will only process your personal data for specified, explicit and legitimate purposes and we will not process your personal data further in a way that is incompatible with those purposes. Where required under applicable law, we will also collect your express consent to any of the above-mentioned activities. You have the right to withdraw any given consent at any time.

3. HOW DO WE SHARE YOUR INFORMATION?

For the purposes for which we collect your personal data and subject to the appropriate legal basis described under Section 2 above, we may disclose your personal data to the following categories of recipients:

- a) Authorised staff members of ABI who access your personal data on a need-to-know basis;
- b) Affiliates and subsidiary companies of ABI, primarily for business and operational purposes;
- c) Service providers: companies that provide Services on behalf of ABI and under our instructions, that provide services to us, for the purposes of providing the Website or our Services.
- e) Other parties when required by law: ABI may share your personal data with other third parties:

- to comply with the law, regulatory requests, court orders, subpoena, or legal processes;
 - to verify or enforce compliance with ABI's policies and agreements; and
 - to protect the rights, property or safety of ABI, its customers, visitors to this Website and/or the public;
- f) Other parties in connection with corporate transactions such as a merger, acquisition, sale of assets, joint venture, or any other transaction that results in a change in control or ownership of ABI, in whole or in part;

Please be aware that service providers who may offer products and/or services to you through their services or via their own channels may separately collect personal data from you. In such case, ABI is not responsible for the collection of this data. These third parties are solely responsible for the control of such personal data and the processing of your data will be subject to their Privacy Policy.

The above recipients of your personal data may be located within or outside the EEA, including in countries not recognized by the European Commission as offering an adequate level of protection of personal data. Please refer to Section 10 below for information regarding such transfers and the appropriate safeguards implemented by ABI.

4. WHAT ARE YOUR RIGHTS?

Under the conditions set forth under applicable data protection laws, you have the right to access and rectify your personal data, as well as the right to object at any time to the processing of your personal data for direct marketing purposes, including profiling related to such direct marketing, and, in certain cases, to object to the processing based on grounds relating to your particular situation. In addition, you have the right to request the restriction of the processing and the erasure of your personal data (right to be forgotten) as well as the right to data portability. When the processing of personal data is based on your consent, you have the right to withdraw your consent at any time.

You can exercise these rights by sending a written request to our data protection contact (see Section 5 "WHO CAN YOU CONTACT IN CASE YOU HAVE QUESTIONS OR REQUESTS?").

You also have the right to lodge a complaint with your competent supervisory authority.

If you require further information in relation to your privacy rights or would like to exercise any of these rights, please also contact our data protection officer (see Section 5 "WHO CAN YOU CONTACT IN CASE YOU HAVE QUESTIONS OR REQUESTS?").

5. WHO CAN YOU CONTACT IN CASE YOU HAVE QUESTIONS OR REQUESTS? THE DATA PROTECTION CONTACT POINT

ABI has in place a data protection contact point available for you to submit your questions or requests relating to the processing of your personal data. You can access this data protection contact point in our global "contact us" website (<https://contactus.ab-inbev.com>) or budstart@ab-inbev.com.

When you exercise these rights, ABI may collect your name, e-mail address and your request details. Please be aware that ABI only requires your e-mail address and request in order to process your request.

Other details are optional for you to share with us. Your personal details will be saved only so that we can respond to your request, and will subsequently be deleted, unless there are legal requirements stipulating the retention of these data.

Please contact our data protection contact point or our data protection officer indicated above if you wish to exercise your rights as data subject in the terms described in Section 4.

6. LINKS TO THIRD-PARTY SITES

We are not responsible for the security or privacy of any information collected by other websites, applications, or other services or by your mobile operating system operator, wireless carrier, or other similar providers. You should exercise caution and review the privacy statements applicable to the third-party websites, applications and services you use.

7. NOT USING COOKIES AND SIMILAR TECHNOLOGIES

What are cookies and similar tracking technologies? Cookies are small text files that are placed on your device by websites that you visit. We do not use any type of cookies and similar technologies on this Website.

8. INTERNATIONAL TRANSFERS

The Website is hosted by servers located in *India*. If you are attempting to access this Website from a physical location within the United States, Asia, or any other region with laws or regulations governing personal data collection, use, and disclosure that differ from European Union laws, please be advised that your use of this Website is governed by the General Data Protection Regulation (European law) and national law (Belgian law) and these policy. To the extent, you provide personal data through the Website, you are transferring your data to *India*.

In connection with any transfer of your personal data to outside the European Economic Area (= member states of the European Union + Iceland, Norway, and Liechtenstein, “EEA”) in countries that are not recognized by the European Commission as offering an adequate level of data protection (no 'adequacy decision'), we implement appropriate safeguards to ensure an adequate level of protection of your personal data. These safeguards can for instance consist in agreeing with recipients on standard data protection clauses in the form of entering into template model clauses such as the Standard Contractual Clauses for the transfer of personal data to third parties adopted by the European Commission guaranteeing such adequate level of protection. You may obtain a copy of such safeguards (Standard Contractual Clauses) by contacting us at data protection officer, First Privacy GmbH, at: e-mail: abi-team@firstprivacy.com ; phone: +49 421 69663282.

9. SECURITY

We ensure that appropriate technical and organisational security measures are taken against unlawful or unauthorised access or use of your personal data, as well as against accidental loss or damage to the integrity of your personal data.

We update and test our security technology on an ongoing basis. We restrict access to your personal data to those employees who need to know that information to provide benefits or Services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy

and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

Your personal data will only be processed by a third party data processor if that data processor agrees to comply with those technical and organisational data security measures.

Maintaining data security means guaranteeing the confidentiality, integrity and availability of your personal data:

- (a) Confidentiality: we will protect your personal data from disclosure to third parties.
- (b) Integrity: we will protect your personal data from being modified by unauthorised third parties.
- (c) Availability: we will ensure that authorized parties are able to access your personal data when needed.

10. CHILDREN'S PRIVACY

Please note that our Website is only available for persons of legal age, only share the content of our Website people who are of legal age. Our Website and Services are not intended for individuals under the legal age. If we learn that an individual under the legal age has provided us with personal information, we will delete it.

11. CHANGES TO THIS PRIVACY POLICY

Except to the extent limited by applicable law, ABI may decide at any time – at its discretion – to change, modify, and/or add all or parts of this Privacy Policy in the future. Any change to this Privacy Policy will be posted on this page and, notified to you by e-mail (where appropriate or required by law and to the extent that we have your e-mail address). We will indicate at the top of this Privacy Policy the date on which the Policy was last modified.

Where required by law, we may also ask you to expressly confirm your consent to the modified Privacy Policy.