



Budweiser Brewing Company APAC Limited

百威亞太控股有限公司

(A company incorporated in the Cayman Islands with limited liability)

Privacy Policy

OVERVIEW, APPLICABILITY AND GOVERNANCE

Budweiser APAC supports the right to privacy, including the rights of individuals to control the dissemination and use of personal data that describes them, their personal choices, or life experiences. Budweiser APAC is committed to protect your personal data and the personal data of our customers, consumers, website users, suppliers and vendors.

This privacy policy sets forth the principles which guide Budweiser APAC when processing personal data. However, recognizing that legal frameworks may vary depending on the country where the company does business, Budweiser APAC expects all its controlled affiliates to adapt this policy to be compliant with the applicable laws of the countries where Budweiser APAC conducts business. This policy applies to all Budweiser APAC employees, temporaries and other workers processing personal data on behalf of Budweiser APAC. All of these people are expected to be familiar and fully in compliance with this policy.

Furthermore, as such laws and regulations contemplate sanctions for violations of data protection laws, Budweiser APAC must also sanction those who do not comply with this policy. Such sanctions - depending on the severity of the violation - can range from a simple admonishment to a formal warning or even a termination of employment.

1. PROCESSING PERSONAL DATA ON BEHALF OF BUDWEISER APAC

Any operation or set of operations performed on personal data such as, but not limited to, collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination and erasure should be considered "processing".

Any processing conducted on behalf of Budweiser APAC of individual's data such as, but not limited to, name, address, telephone number, address, social security number, driver's license number should comply with this policy.

1.1 Internal Processing of Personal Data – No Third Party involved

In relation to any project (application, website, web shop, etc) managed internally which involves the processing of personal data, a privacy impact assessment ("PIA", i.e. basic set of questions that will need to be answered for privacy risk impact assessment purposes) must be conducted. Such PIA will be followed by a remediation plan which will need to be implemented by the employee responsible for the project.

If you have questions concerning a PIA or the processing of personal data, please contact Legal/Compliance team through the compliance channel at <http://compliancechannel.budweiserapac.com> for further information.

1.2 Processing of personal data involving a third party

For any project involving a third party, i.e. projects in which Budweiser APAC acquires the right to use personal data or, more generally, any time a third party processes personal data on behalf and under the instructions of Budweiser APAC, a PIA must be conducted and followed by a remediation plan which will need to be implemented by the employee responsible for the project.

In addition, any processing by a third party shall be governed by a contract that sets out the subject-matter and duration of the processing, the nature and purpose of the processing, the type of personal data and categories of individuals and the obligations and rights of Budweiser APAC and of the third party regarding the processing of personal data.

2. WHEN BUDWEISER APAC PROCESSES PERSONAL DATA RELATING TO YOU AS EMPLOYEE.

2.1 CODE OF BUSINESS CONDUCT

Please consult the Budweiser APAC Code of Business Conduct and local regulations on the applicable rules relating to the use of e-mails, internet and information systems, social media, the company assets, as well as on external communications.

2.2 MONITORING OF INTERNAL ACTIVITIES

Subject to applicable regulation, Budweiser APAC reserves the right to monitor, access, retrieve, read, or disclose internal communications (e.g. e-mails and files) in a manner reasonably tailored to address a business concern, including the right to examine electronic mail, personal computer file directories, hard disk drive files, and other information stored on Budweiser APAC information processing systems. This information may include personal data.

2.3 BRING YOUR OWN DEVICE (BYOD)

In accordance with specific policies issued by the Solutions Department, you may opt to use your own personal equipment (e.g. cell phone, laptop, tablet) for professional purposes. The same rules and standards as set out in this Policy and in the Code of Business Conduct apply to such BYOD.

In case of BYOD, you must be aware of the fact that all information and communication sent through the Budweiser APAC's network, emails or servers is considered as being the property of Budweiser APAC.

Seeking Advice

If you have any questions regarding the application of this Policy, you should seek advice from the Legal/Compliance team through the Compliance Channel, available on the company's portal or at <http://compliancechannel.budweiserapac.com>.