

PRIVACY AND COOKIE POLICY SWINKELS FAMILY BREWERS

PRIVACY POLICY

1. Introduction

Swinkels Family Brewers (hereinafter referred to as 'SFB') would like to contact you in a way that makes you feel comfortable. In this privacy and cookie policy we indicate which information we can ask of you, why we ask for this information and how you can influence it.

This privacy and cookie policy applies to all websites, online stores, social media channels, (digital) advertising campaigns, newsletters, promotions etc. of SFB and associated brands. The objective here is information that is privacy-sensitive. In short, these are all the (unique) personal details that apply to you or are traceable to you.

2. The objective of processing personal data

When using our products and services, we may collect personal data from and about you. This could be information that you provide us with when buying products via our online stores, a contact form that you fill in to contact us or information that we collect when you use our (mobile) websites, apps, online stores and other services such as online advertising campaigns, events, promotions, competitions and loyalty programmes.

We collect personal data in order to better tailor our products and services to your needs on the basis of the insights we obtain from them. We also do this for commercial reasons, namely to gain a better understanding of the products and services that you are interested in as a user and to make the advertisements that we use as relevant as possible for you.

In this document we explain, among other things, how we deal with your personal data, how and what information we (can) collect and the purposes for which we (may) use them. In addition, this document also contains information on how you can access your data, how you can change or delete data (or have these changed or deleted), and who the (possible) recipients of these data are.

3. Grounds for processing

Personal data may only be processed if there is a legal ground for this. Legal grounds on which SFB can process your personal data are:

Permission: We can speak of legally valid permission if you express in a free, informed and unambiguous way that you agree to a specific processing by SFB, such as when you register for an email newsletter.

Necessary for the execution of an agreement: Your personal data could also be processed by SFB because this is necessary for the execution of an agreement that you have or will conclude with SFB, or to take measures because of your request to conclude of an agreement.

Legal obligation: In some cases, SFB must process your personal data in order to comply with a legal obligation that lies with SFB. An example is the retention of certain data on the basis of tax legislation.

Justified interest: SFB could also process your data when this is necessary for the protection of its legitimate (business) interests or those of a third party, unless your interests, fundamental rights or fundamental freedoms outweigh these. In order to determine whether processing can take place on

this legal ground, a weighing of interests must be done in advance between the interests of SFB (or a third party) and the interests of the data subjects. For example, processing for the purpose of fraud prevention (if a prior and careful weighing of interests rules in favour of the business interests) could occur on this legal ground.

4. Which data are processed?

4.a General

SFB processes personal data that are satisfactory, relevant and limited to what is necessary to achieve its intended purpose. In order to achieve this goal SFB processes, among other things (but not exclusively), data from consumers and business relations. This may include the following data:

- First and last name;
- Gender;
- Date of birth;
- Address;
- Telephone number;
- Email address;
- Other personal data that are actively provided;
- Data concerning activities on our website;
- Data about your surfing behaviour on our websites;
- IP address;
- Location data;
- Internet browser and type of device.

The above is a summary of the data we could collect. This does not mean, however, that we actively request them from everyone and retain them. It may be, for example, that the one service requires your email address, while another doesn't and uses your location instead.

4.b The provision of data is not mandatory but sometimes necessary

You are not obliged to disclose your personal details when you communicate with us. You always have the choice whether you want to provide your personal details or not.

However, in order to make use of some of our products and services, entering your personal details is necessary. For example, if you buy a product from one of our online stores, we will need your details to have the product delivered to you and to prepare an invoice. If you want to receive a newsletter or create an account for an online store or loyalty programme, then we need at least a valid email address.

4.c Participation in campaigns, prize distributions, competitions

If you participate in competitions or events we could ask you for personal details. Which details depends on the campaign, prize distribution or competition. To be able to win, we will often ask for your name, email address, home address, telephone number and answers to open questions. If it is necessary to send you the prize by post (e.g. tickets or products), we will also ask for your postal address or other specific details that we need in order to forward this prize. We need this information to process your participation and to be able to communicate with you about your prize or to send the prizes to you.

4.d Exchange of data within SFB

We track your use of our online services by means of (a) cookie(s) (see below). The following applies here; that all SFB websites and means of communication, in principle, use the same system and that the data provided could also be combined.

In some cases we may combine your data with:

- Data obtained by us when you viewed and/or clicked on one of our advertisements.
- Data obtained by us when you made a purchase at one of our online stores.
- Data obtained by us when you made use of our products or services.
- Data obtained from other sources (e.g. via partners with whom we collaborate).

Based on the data obtained, we draw up a profile so that we can serve you better and ensure that we can be even more relevant to you.

When you complete a registration form on one of our websites, we can add the details you have entered to the cookie we use to measure your use of our online services. In addition, we do not combine all the details you enter with the online user information. We will limit ourselves to data such as your age, gender and (the digits of your) postal code. In this case the data will be used to set up an online profile.

These profiles will only be used to better tailor our offer to your interests. If you object to the exchange and combination of your personal data within SFB and its affiliated companies and/or the creation of an online profile, you can make this known via the contact form. Where possible, we will cease the processing and delete the data.

5. Use of data/data retention periods.

The period(s) during which we use the data depends on the type of information we have and how and why we have received this information.

SFB will not retain the personal data it collected for longer than is necessary to realise the purposes for which the personal data have been processed. Point of departure for SFB is that it will not retain the personal data for more than one year, unless the applicable (civil or tax) legislation prescribes a longer period. At the end of this period, the personal data will be deleted or anonymised by SFB.

For example, if you receive emails with advertising campaigns and offers of SFB products and services because you are (or have been) a customer of SFB, you will continue to receive them up to a year after purchase or use.

If you receive emails with advertising campaigns and offers of SFB products and services because you have registered for this, you will continue to receive them until you have unsubscribed.

Financial data (data relating to the purchase/sale of a product) must in many cases be retained for seven years for tax purposes.

6. SFB'S RESPONSIBILITY

This privacy and cookie policy applies to the processing of data by SFB (trade name of Bavaria N.V.) and its affiliated companies. SFB is the party responsible for the processing of personal data. The

brands covered by SFB include Bavaria, Swinckels', Palm, Rodenbach and La Trappe. For a complete overview of the brands reference is made to www.swinkelsfamilybrewers.com.

6.a Processors of SFB

SFB shares the personal data it processes with third parties, if it considers this necessary or useful to optimise a business process, to execute an agreement or to comply with a legal obligation. SFB enters into a processing agreement with all the companies that process personal data on behalf of SFB. This agreement must ensure an equivalent level of security and confidentiality of personal data as is customary at SFB. SFB remains responsible for this processing. Examples of third parties with whom SFB can share personal data are:

- Developers of digital services;
- Delivery services for our products;
- Suppliers of technical platforms, data warehouses and infrastructure management;
- Payment service providers;
- Suppliers of products;
- Debt collection services;
- Analytics and data management services;
- Companies that conduct market research and customer surveys;
- Marketing services (CRM/email marketing platforms, marketing agencies);
- Customer Service;
- Advertising agencies and ad-tech vendors.

Finally, we can share certain anonymised data with third parties, such as the number of users searching for a particular term, or how many users clicked on an ad. You cannot be identified on the basis of this data.

6.b Transfer of data to third parties in other countries and security

When we pass on personal data to third parties causing the personal data to be processed in countries outside the European Economic Area, we will ensure that the data are transferred and processed in a manner that is permitted under applicable privacy legislation.

In the processing of personal data we will, at all times, maintain a level of security which, in view of the state of technology, is appropriate to prevent unauthorised access to and adaptation, disclosure or loss of personal data. This could include both technical and organisational measures (such as encryption of data, a limited group of employees who have access to the data, pseudonymisation of data, anonymisation of data, etc.).

6.c Young people

Not yet 18 years old? In that case it is not possible to make use of our services and/or products. We will ask for your date of birth by means of an "age check" to determine whether you are 18 years (or another statutory age) or older.

7 Rights and Contact

Through this privacy and cookie policy we wish to provide clarity about the way in which we handle your data. If you have questions about this document or the processing of data by SFB, or if you want

to exercise your rights as a data subject (request for access, adaptation or deletion of data, objection to processing, restriction of processing or data portability) you can contact us via the below contact details or via the contact form.

7.a Rights

You have the following rights:

Right of access: You have the right to inspect your personal data that we have processed free of charge.

Right to rectification: If your retained personal data is incorrect or incomplete, you can ask us to supplement or correct this.

Right to erasure of data: You have the right to have your personal data deleted when (i) the data is no longer required for the purpose for which it was collected, (ii) you withdraw your consent for the processing (and if there is no other legal ground for the processing), (iii) you (legitimately) object to the processing, (iv) the personal data are processed unlawfully, (v) this is required by law or (vi) the personal data have been collected within the context of a so-called information society service. In some cases it will not be possible to delete your personal data, for example when there is a legal obligation for SFB to retain the data, when the data are necessary to execute an agreement with you (e.g. the delivery of a product after ordering it from one of our online stores) or when the right to freedom of speech and information should weigh more heavily in a specific case.

Right to restrict processing: You have the right to request a restriction on the processing of your personal data (e.g. while the accuracy of your personal data is being checked).

The right to data portability): Under certain conditions you have the right to receive the personal data you have provided to us in a structured, current and machine-readable format and to pass on your personal data to a third party of your choice.

Objection to processing: You have the right to object to the processing of your personal data due to reasons related to your specific situation. In this case, a weighing of interests will take place taking your specific situation into account.

You also have the right to file a complaint with SFB or the authoritative body in charge of the protection of personal data, i.e. the Dutch Data Protection Authority. You can also state that you no longer want (i) your personal information to be provided to group companies or to third parties, (ii) your personal data to be combined into a profile, (iii) your data used for making targeted offers or receiving information and offers by e-mail.

7.b Contact

By regular mail:

SFB
Attn. "Customer Service Privacy"
P.O. Box 1
5737 RV Lieshout
+31 (0)499-428111

By email: privacy@swinkelsfamilybrewers.com

If you do not use the relevant web forms for a request, remember to clearly state your (full) name, address and place of residence and to include a copy of an identification document (which clearly states that it is a copy and where your CSN number has been made unrecognisable). We need this information in order to determine, with some certainty, whether the data referred to in your request relates to you. The copy of your ID will only be processed for the purpose of your identification within the context of your request and will subsequently be deleted.

The SFB privacy and cookie policy can be changed from time to time. For example, in connection with changing legislation or technological developments. Where possible and necessary, we will keep you informed of these changes.

COOKIE POLICY SFB

1. What are cookies?

SFB uses functional, analytical and tracking cookies. A cookie is a small text file that is stored in the browser of your computer, tablet or smartphone when you first visit this website. On the one hand SFB uses cookies with a purely technical functionality. These ensure that the website functions properly. In addition to this, they can also remember your preferred settings.

And on the other SFB uses cookies to optimise its websites and to keep up with the surfing behaviour of the website visitor, so that SFB can offer tailor-made content and advertisements. Upon the first visit to the SFB websites, the visitor is informed about these cookies.

2. Types of cookies

Below are the different types of cookies that we place. The purpose for which we use these is also indicated per type of cookie. Here we use the current English terminology.

Always Active

These cookies are necessary for the website to function and cannot be disabled in our systems. They are usually only set to respond to actions in respect of a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to alert you about these cookies or to block them which could result in some parts of the site not working properly.

Analytical Cookies

These cookies allow us to keep track of visits and traffic sources, so that we can measure and improve the performance of our site. These cookies help us find out which pages are the most and least popular and how visitors move around the site. All the information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies, we will not know when you have visited our site.

Functional Cookies

These cookies allow for the provision of enhanced functionality and personalisation, such as videos and live chats. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies, then some or all of these functionalities may not function properly.

Targeting Cookies

These cookies are set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and to show you relevant ads on other sites. They work by uniquely identifying your browser and device. If you do not allow these cookies, you will not experience our targeted advertising across different websites.

3. Google Analytics

The American company Google places cookies via our websites as part of the "Analytics" service. We use this service to compile reports on how the visitors use the website. Google can provide this information to third parties if Google is legally obliged to do so, or if third parties process the information on behalf of Google. We have no influence on this. We have allowed Google to use the information obtained for other Google services.

The information that Google collects is anonymised as much as possible. Your IP address is not included. Google states that they adhere to the EU-US Privacy Shield Framework. This means that there is an appropriate level of protection in place for the processing of any personal data.

4. Facebook and Twitter buttons and YouTube videos

Buttons are included on our websites to promote web pages ("like") or share ("tweet") on social networks such as Facebook and Twitter. There are also videos from YouTube embedded in our website. These buttons function on the basis of strings of code originating from Facebook, Google/YouTube or Twitter. Cookies are placed through this code. We have no influence on this. Read the privacy statements of Facebook, Google and Twitter (which can change regularly) to find out what exactly they do with your (personal) data processed via these cookies.

The information they collect is anonymised as much as possible and is transferred to and saved by Twitter, Facebook, Google and LinkedIn. LinkedIn, Twitter, Facebook and Google+ are committed to adhering to the EU-US Privacy Shield Framework. This means that there is an appropriate level of protection in place for the processing of any personal data.

5. Cookie overview

More information about enabling, disabling and removing cookies can be found in the instructions and/or through the help function of your browser.

Some tracking cookies are placed by third parties who use our websites to show you advertisements. These cookies can be managed centrally via 'Your Online Choices'. www.youronlinechoices.com

6. For which domains does SFB request permission to place cookies?

SFB will always inform its visitors about the use of cookies on each website (domain) or app.

If you have disabled cookies via your browser settings, there is a chance that certain functions will not work or that you will not be able to make use of certain services. In any case, you will then see the cookie information bar on each page. The reason being that our websites will not be able to "remember" (via a cookie) that you have visited the website before and that you have possibly already made a choice between accepting cookies or not.

As mentioned earlier, we can exchange personal data processed by us with group companies. We may also combine your personal data with data collected within the context of your purchase or use of our products or services (or products or services of group companies). This also concerns surfing data collected via cookies.

This cookie policy was last modified on 24 August, 2018.