

Supplemental California Privacy Information Notice

This Supplemental California Privacy Information Notice (the “Supplemental California Privacy Information Notice”) applies to data collected by Asahi Beer U.S.A., Inc. When used in this Supplemental California Privacy Information Notice, “we,” “us,” and “our” refers to us, Asahi Beer U.S.A., Inc.

We are required by law to provide California residents with certain additional information about their privacy rights under the California Consumer Privacy Act (“CCPA”). This Supplemental California Privacy Information Notice is intended only for California residents.

Information Collected

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, device, or household (“personal information”). We do not collect any additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

The categories of personal information (which are defined by the CCPA) that we may have collected and/or disclosed for a business purpose in the past 12 months are outlined below. The examples of personal information provided for each category are taken from the CCPA and are included to help you understand what the categories mean. The examples are not meant to indicate what we actually collect or disclose.

Category	Category of Source of Collection	Sell, Share, or Disclose	Third Parties (if sold, shared or disclosed)
Identifiers (A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers)	Directly from you Your browser or device	Shared Disclosed	Third Parties and Service Providers providing advertising and marketing services or supporting essential business functions or helping us deliver essential services to you.

Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Directly from you	Disclosed	Third Parties and Service Providers supporting essential business functions or helping us deliver essential services to you.
(A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information)			

Protected classification characteristics under California or federal law

(Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information))

Directly from you

Shared
Disclosed

Third Parties and Service Providers providing advertising and marketing services or supporting essential business functions or helping us deliver essential services to you.

Commercial information

(Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)

Directly from you

Shared
Disclosed

Third Parties and Service Providers providing advertising and marketing services or supporting essential business functions or helping us deliver essential services to you.

Biometric information

(Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data)

None

N/A

N/A

Internet or other similar network activity

(Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement)

Your browser or device

Shared
Disclosed

Third Parties and Service Providers providing advertising and marketing services or supporting essential business functions or helping us deliver essential services to you.

Geolocation data

(Physical location or movements)

Your browser or device

Shared
Disclosed

Third Parties and Service Providers providing advertising and marketing services or supporting essential business functions or helping us deliver essential services to you.

Sensory data

(Audio, electronic, visual, thermal, olfactory, or similar information)

None

N/A

NA

Professional or employment-related information

(Current or past job history or performance evaluations)

Directly from you

Disclosed

Third Parties and Service Providers providing advertising and marketing services or supporting essential business functions or helping us deliver essential services to our employees.

Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))

(Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records)

None

N/A

N/A

Inferences drawn from other personal information

(Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes)

None

N/A

N/A

Sensitive Personal Information

(social security, driver's license, passport number, account access credentials, precise geolocation, racial or ethnic origin, religious beliefs, union membership, genetic data, mail, email, or text message contents, unique identifying biometric information, sex life or sexual orientation information)

- Directly from you
- From third parties

Disclosed

Third Parties and Service Providers supporting essential business functions or helping us deliver essential services to our employees.

We use the personal information for the following business and commercial purposes:

- To operate our website to provide you access to and use of our services.
- To customize, measure, and improve our services and our marketing communication activities based on your background, interests, or service or promotion preferences.
- To provide services and products requested by you as described when we collect the information.
- To contact you to conduct research about your opinions of current services and products, or of potential new services and products that may be offered by us.
- To send you communications regarding marketing measures and activities, or conduct webinars informing you of our news, events, new products, business tools and information, and activities.
- To maintain the integrity and safety of our data technology systems that store and process your personal data.
- To provide anonymous reporting for internal and external customers.
- To share your contact details with our business partners so that they can assist us to deliver our services and products to you.
- To enforce or defend our policies or contract with you.
- To detect and investigate data breaches, illegal activities, and fraud.

We may also disclose your personal data to (1) governments and/or government-affiliated institutions, courts, or law enforcement agencies, to comply with our obligations under relevant laws and regulations, enforce or defend our policies or contract with you, respond to claims, or in response to a verified request relating to a government or criminal investigation or suspected fraud or illegal activity that may expose us, you, or any other of

our customers to legal liability; provided that, if any law enforcement agency requests your data, we will attempt to redirect the law enforcement agency to request that data directly from you, and in such event, we may provide your basic contact information to the law enforcement agency, or (2) third parties involved in a legal proceeding, if they provide us with a court order or substantially similar legal procedure requiring us to do so.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- The categories of third parties with whom we disclose that personal information.
- The specific pieces of personal information we collected about you.
- If we sold, shared, or disclosed your personal information for a business purpose, three separate lists disclosing:
 - the categories of personal information that we collected about you;
 - sales or sharing (if any), identifying the personal information categories that each category of third parties to whom the personal information was sold or shared; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Likewise, you have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech rights, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.

- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us and compatible with the context in which the consumer provided the information.
- Comply with a legal obligation.

In the absence of a verifiable consumer request from you, we will retain your personal information for as long as we think is necessary to fulfill the purposes for which it was collected, and we reserve the right to retain it to the full extent permitted by law before automatically deleting (and directing our service providers to delete) it. Retention periods can vary based on the category of personal information, and we use criteria which include the following to determine the relevant retention period: the term of a contract with you, our operational needs, legally mandated retention periods, pending and potential litigation, historical archiving, and intellectual property or ownership rights.

Further, you have the right to request a business that maintains inaccurate personal information about you to correct that inaccurate personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information. Once we receive and confirm your verifiable consumer request, and taking into account the foregoing, we will use commercially reasonable efforts to correct the inaccurate personal information as directed by you.

California residents can exercise the rights discussed above by submitting a verifiable consumer request to us either:

- By email at personaldataprotection@eu.asahibeer.com
- Calling us toll-free at 844-228-7003, Monday - Friday 9am – 5pm Pacific Time

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We ordinarily respond to a verifiable consumer request within 45 days. If we require more time, we will inform you of the reason and extension period in writing. Unless otherwise requested, any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. Under the CCPA, you may request that we disclose certain information to you about our collection and use of your personal information beyond the past 12 months. We, however, may decline to provide you that information if doing so

would require a disproportionate effort on our part. The response we provide will also explain the reasons we cannot comply with a request, if applicable. As necessary, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sharing Opt-Out

As long as you are 16 years of age or older, you also have the right to direct us to not sell or share your personal information at any time (the “right to opt-out”). We do not collect, use, sell, or share the personal information of consumers we know to be less than 16 years of age. We do not sell your personal information.

Discrimination Protections

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.
- Retaliate against an employee, applicant for employment, or independent contractor for exercising their rights.

California’s “Shine The Light” Disclosure

We have not shared any personal information with other companies for their direct marketing use within the immediately preceding calendar year. Accordingly, California’s “Shine the Light” law, Cal. Civil Code § 1798.83 to § 1798.84, does not apply to us and we have not established any mechanism for you to request information on our sharing of information for third parties’ marketing purposes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, or to exercise your rights hereunder, please contact us at:

personaldataprotection@eu.asahibeer.com

or via our toll-free number:
844-228-7003

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