



PRIVACY POLICY FOR THE LATAM WEBSITE

Introduction and General Terms

Distribuidora La Florida S.A., with corporate identification number 3-101-295868, part of the Florida Ice and Farm Company S.A. (FLORIDA) Economic Group, on its own behalf and on behalf of all its Latin American beverage operating subsidiaries or affiliates, is committed to protecting the personal information you provide to us in accordance with the terms and conditions outlined in this Privacy Policy. FLORIDA will be the data controller/custodian responsible for processing your information.

This Privacy Policy, which you represent that you have carefully read and reviewed, and expressly agree to, relates to our use of any personal information we collect from you through the following means or services:

- any FLORIDA website that links to this Privacy Policy;
- FLORIDA social networks, messaging services or official FLORIDA content including, without limitation: activities, advertisements or platforms related to FLORIDA, hereinafter the "Platform" or other FLORIDA websites or applications;
- mobile device applications;
- our consumer service hotline;
- any official FLORIDA email address or SMS number;
- our consumer service mailing address; or
- offline, through or at FLORIDA events of any kind or points of sale.

We may ask you to agree to this Privacy Policy through any of the above channels, including the Platform website (the "Website"). If you do not agree to the data processing conditions detailed in this document, please refrain from making use of any of the services detailed above, on the understanding that, in this case, none of the purposes detailed in Sections 4 to 7 will be fulfilled.

To optimize the delivery of our services and to facilitate some of our marketing efforts, we collect certain specific information about you.

This Privacy Policy explains the following:

- What information FLORIDA may collect about you;
- How FLORIDA will use the information we collect about you;
- When FLORIDA may use your information to contact you;
- Whether FLORIDA will disclose your data to someone else;
- Your choices regarding the personal information you provide to us;

We use all personal information you provide to us or that we collect from you in accordance with all applicable laws in your country of residence, including those relating to the protection of personal information.



FLORIDA websites may contain hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies and are also likely to use cookies. We recommend that you review the privacy policies that will govern the use of personal information that you submit or provide when you visit those websites and that may also be collected by cookies. We accept no responsibility for such third party websites and your use of such websites is at your own risk.

Before engaging in any activity in connection with the Platform or the Website, you should carefully read and agree to the "Regulations" applicable to such activity, including the Website. Please note that if you are a minor under your country of residence, you will require the permission and consent of your parents (or legal guardians) to participate in FLORIDA's activities including the Platform and the use of the Website, as well as the processing of your personal data.

1. WHAT INFORMATION WILL FLORIDA COLLECT ABOUT YOU?

When you participate in, access or subscribe to any of FLORIDA's services, activities (including the Platform) or online content (including on social media and messaging applications), such as: newsletters, promotions, live chats, social media interactions, message boards, web or mobile notifications or requests for votes or messages, we may collect personal information about you. This may include, but is not limited to, your name, email address, mailing address, phone or mobile number, gender or date of birth, as well as information collected about your use of FLORIDA services, such as what you read, viewed or did on our websites (including the Website), applications or when making use of other of our services.

It is very important that the information you provide to us is not of a sensitive nature, such as: information about your ethnic or racial origin, ideology, political, religious or philosophical convictions or beliefs, your political party or trade union membership, your physical condition and mental health status, biometric or genetic configuration data, information about your life or sexual orientation, criminal record, etc. If we identify this type of information within our databases, it will be deleted.

Some of our services allow you to log in through third-party services, such as Facebook, Twitter and Instagram. If you choose to log in through a third-party service, you will be presented with a dialog box asking for permission to authorize FLORIDA to access your personal information (e.g., your full name, date of birth, email address, and any other information you have made publicly accessible on the third-party website or application). FLORIDA also collects information about how you use FLORIDA mobile applications, FLORIDA websites or other FLORIDA online content, and the devices you use to access the Services, as well as unique identifiers such as IP addresses, which are numbers that can uniquely identify a specific computer or other network device on the Internet.

Your personal information will be stored in a "Customer" database owned by FLORIDA or any of its affiliates, controlling entities or subsidiaries.



2. HOW WILL FLORIDA USE THE INFORMATION IT COLLECTS ABOUT ME?

FLORIDA will use your personal information for the following purposes:

- a) optimizing and improving the provision of our online services, activities or content (including, without limitation, the Platform), or communicating information about them (for example, in connection with upcoming promotions or new product launches, events or commercial information about our brands) or addressing your requests and inquiries; this includes your participation in any of our promotional activities related to any of our products or brands, including, without limitation, the Platform.
- b) service administration, which means that FLORIDA may contact you for reasons related to the service, activity or online content for which you have subscribed (for example, notifying you about the handling of a promotion in which you have participated or notifying you that a particular service, activity or content has been suspended for maintenance, or to inform you of any updates to our Privacy Policy, whether through our own or third party means);
- c) customize the content you see on our sites and applications, including the Website, and the advertising you see on our sites, applications or other websites or services;
- d) work with third parties to show you relevant advertising on third party websites.
- e) contact you about any request you have made;
- f) use IP addresses and device identifiers to identify the location of users, block disruptive use, establish the number of visits from different countries, tailor the content of our websites, applications or other services (including the Website) based on browsing behaviors, and determine from which country you are located and access the services;
- g) analysis and research to enable us to improve the services offered by FLORIDA;

3. WHEN WILL FLORIDA CONTACT ME?

FLORIDA may contact you:

- in connection with any correspondence we receive from you or any comments or complaints you make about FLORIDA's products or services;
- in connection with activities, promotions or other events to which you have subscribed or signed up for, including, without limitation, the Platform;
- in connection with any contributions or questions you have sent to FLORIDA, for example on FLORIDA's social networking sites, via text message, voice message or other messaging services;
- to inform you of any material changes to FLORIDA's policies and practices; and
- for marketing purposes, as set forth in Section 4.

4. WILL FLORIDA CONTACT ME FOR MARKETING PURPOSES?

In accordance with this Privacy Policy, FLORIDA may send you marketing emails, notifications or may contact you for marketing purposes. You may withdraw your permission to receive marketing communications at any time by: i) clicking or selecting the "unsubscribe" option in our marketing



communication, ii) through the appropriate "Customer Service Center", or iii) by contacting us at consultas@fifco.com.

5. WILL FLORIDA SHARE MY PERSONAL INFORMATION WITH ANYONE ELSE?

FLORIDA may forward or disclose your personal information to other FLORIDA group entities or third parties for any of the above purposes. For example, relevant third parties to whom FLORIDA may disclose your personal information are: government agencies and third parties who provide services on our behalf or to our benefit, such as web hosting providers, payment providers, mass communications or communication strategy design managers, marketing or communication agencies, customer relationship management providers, media agencies, website analytics providers, logistics providers or agencies, and to our bottlers, affiliates or subsidiaries.

When we disclose your personal information to third parties, we ensure that such third parties use your personal information only in accordance with our instructions or policies/agreements, or to comply with applicable legal obligations.

FLORIDA may also disclose your personal information to third parties:

- a) when required by law,
- b) for the purpose of, or in connection with, any legal proceedings, or otherwise for the purpose of establishing, exercising or defending FLORIDA's legal rights,
- c) when we believe disclosure is necessary to prevent harm or financial loss, or in connection with an investigation of suspected or actual criminal activity; or
- d) if we sell or transfer all or a portion of our business or assets (including through a merger, reorganization, spin-off, dissolution or liquidation).

6. INTERNATIONAL TRANSFER OF PERSONAL DATA

By this informed consent, you consent to the transfer of your personal information to other countries.

When FLORIDA transfers personal information outside of your country of residence, either within the FLORIDA group of companies or to a third party, FLORIDA only transfers such personal information:

- a) to a country that is deemed to have adequate or superior data protection laws; or
- b) to a company that provides adequate data protection in relation to the category of personal information being transferred; or
- c) where we have established an appropriate data transfer mechanism, such as standard contractual clauses, to ensure that your personal information is adequately protected.

If none of these criteria are met, FLORIDA may still transfer personal information outside your country of residence with your consent, or without your consent if the transfer is legally required.

Access to your personal information will be limited to those persons who need to know the information for the purposes described in this Privacy Policy.



7. OFFENSIVE OR INAPPROPRIATE CONTENT ON FLORIDA'S WEBSITES

If you post or submit offensive, inappropriate or objectionable content on any part of the FLORIDA Websites or otherwise engage in any disruptive behavior on any FLORIDA service, FLORIDA may use your personal information to stop such behavior.

Where FLORIDA reasonably believes that you are or may be in violation of applicable laws (for example, because content you have posted may be defamatory), FLORIDA may use your personal information to inform law enforcement agencies about your behavior.

The foregoing does not limit FLORIDA's ability to remove offensive or inappropriate content posted by you or your profile, block or remove you from the Website, the Platform or any other FLORIDA activity, as well as any other action that FLORIDA reserves in accordance with the relevant terms and conditions of promotional activities posted on the Website.

8. WHAT IF I AM A USER UNDER THE AGE OF 18 OR LEGALLY CONSIDERED A MINOR IN MY COUNTRY OF RESIDENCE?

If you are under 18 years of age or are legally considered a minor in your country of residence, you must ask your parents/legal guardians to consent to this Privacy Policy before providing any personal information to FLORIDA. In any case, when FLORIDA carries out specific promotional activities published on the Website and in which it is expressly indicated that minors may participate, FLORIDA shall require, in addition to the consent of the parents/legal guardians to this Privacy Policy, written evidence of the consent given by them for the minor's participation in such activity.

9. HOW LONG WILL FLORIDA KEEP MY PERSONAL INFORMATION?

We will store your personal information in our databases for as long as your account is active, for the time set out in the contract signed with you or, if necessary, as long as it takes to provide you with the services you want, to respond to your questions or even to solve problems or offer new and improved services. We may also retain your personal data in accordance with our internal retention procedure to the extent necessary to comply with our legal and regulatory obligations, to resolve disputes and to be able to perform our contracts. However, after ten years from the date of the occurrence of the recorded events, unless otherwise provided by special regulations, the data will be deleted from our databases. In the event that it is necessary to keep them beyond the stipulated period, they will be disassociated from their owner.

Thus, we may keep your personal data after you have stopped using FLORIDA services or our digital media, in accordance with the law.



10. WHAT ARE YOUR RIGHTS?

- a. You may **access your personal data**.
- b. You may request to **rectify your personal data, update them or request their cancellation or deletion**, if they are inaccurate, incomplete, outdated, or have not been collected with your authorization.
- c. If your personal data have been processed with your consent, you **will have the right to withdraw such consent at any time** without affecting the consent given prior to its withdrawal.
- d. You may request **deletion** of your personal data when: (i) your personal data is no longer necessary for processing purposes, (ii) you have withdrawn your consent to its processing based solely on such consent, (iii) you have objected to the processing of the data, (iv) the processing of your personal data is unlawful, (v) the personal data must be deleted in order to comply with a legal obligation applicable to FLORIDA. FLORIDA shall take reasonable steps to inform the other Group entities of such deletion.
- e. **You may request processing restriction**: (i) in case of objection to the accuracy of your personal data in order to allow us to verify such accuracy, (ii) if you wish to restrict your personal data instead of deleting it in case of unlawful processing, (iii) if you wish FLORIDA to retain your personal data because you need it to secure your defense in the context of a legal action, (iv) in case you have objected to the processing but FLORIDA carries out an investigation to verify whether it has legitimate grounds to proceed with such processing likely to override your own rights.
- f. **You can always choose not to transmit your personal data to us**, in which case your activities and the functionalities we can provide you with may be limited.
- g. **You will have the right to object to the processing of your personal data**, including for marketing purposes based on profiling, or if the processing of the data is based on FLORIDA's legitimate interest.

11. CHANGES TO THE PRIVACY POLICY

By accepting this Privacy Policy, the same shall be deemed applicable to you and your personal information; however, this Policy may be updated periodically, so you should check it each time you access or submit personal information to FLORIDA through the Website. If you do not agree to the most recent version of this Policy, please do not provide personal information to FLORIDA or continue to use the Website. The date of the most recent revisions will appear on this page. Notwithstanding the foregoing, when a material/substantive change is made to this document, and where required by law, we will notify you and seek your consent to the new processing conditions.

12. HOW DO WE PROTECT YOUR PERSONAL DATA?

FLORIDA will take all necessary technical and organizational measures to protect the privacy and security of your personal data collected through our digital media. Such measures include, but are not



limited to: (i) storing your personal data in protected operating environments not accessible to the public, but only to authorized FLORIDA staff members, our agents and contractors and (ii) verifying the identity of registered users before they can access your personal data.

13. WHAT HAPPENS IF YOU REFUSE TO PROVIDE US WITH YOUR PERSONAL INFORMATION?

If you refuse to provide us with the personal information we request, you may not be able to participate in certain activities, enjoy certain personalized functionalities, or the digital media and special services we offer you may be limited. However, you are under no obligation to provide us with your personal information in order to browse our digital media and learn about FLORIDA and our products. In any case, we will always tell you what personal information is required to take advantage of a service.

14. HOW CAN YOU CONTACT US?

If you have any questions, complaints or comments regarding this privacy policy or our information collection practices, you can send us an e-mail to: consultas@fifco.com.

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