

Coca-Cola Whistleblowing Privacy Notice

This privacy notice (the "Privacy Notice") applies to the processing of your personal data when you use EthicsLine to ask a question (each a "Query") or report a concern (each a "Reports"). This Privacy Notice sets out how The Coca-Cola Company and its affiliates (the "Company") ensures a high level of protection for all your personal data in the context of the whistleblowing process and of the use of EthicsLine.

For all use of EthicsLine, The Coca-Cola Company is the controller of your personal data where applicable. In some circumstances other Coca-Cola legal entities might also be a controller of your data (the "Coca-Cola Group"). Where you raise a Report or Query about a Coca-Cola legal entity, that legal entity may also be a controller of your personal data, to the extent relevant to the resolution of the Report or Query. If you are an employee of a Coca Cola legal entity, please refer to your employee privacy notice for information about the controller of your personal data. If you have any questions about which entities are the controller of your data, please contact the privacy team using the contact details set out in this Privacy Notice.

As with all matters of a sensitive nature, the best option for you is to speak directly with your supervisor, management group, or a human resources representative. If uncomfortable with this direct approach of discussing concerns in person or if the concern has not been resolved, the EthicsLine may be used. You may also request to meet with someone about your concerns by filing a report [here](#) or emailing compliance@coca-cola.com.

What personal data do we process and how do we get it?

Personal Data you provide to us

You are not obliged to provide any of your personal data in making a Report and, Reports may be made anonymously. If you choose not to remain anonymous, however, you may provide the following information to us: the country you are located in (if relevant to the Query or Report), the, your relationship to The Coca-Cola Company, your name and contact details, including email address or telephone number (and the best time for communication with you) as well as any other information you include in the free text sections of the Query or Report.

Please note that even when submitting an anonymous Query or Report, however, you might still volunteer personal data in the free text sections.

We do not require you to submit any special categories of personal data (such as information about your racial or ethnic origin, political opinions, religious or philosophical convictions, union membership, health or sex life) in a Query or Report. However, due to the free text fields available to you, you may voluntarily disclose such special categories of personal data, if they are relevant to the Query or Report in question. We kindly ask you to avoid providing us with any special category of personal information not relevant for the Query or Report in question.

Personal data provided by other people

As EthicsLine is free to use by all employees of the Company, suppliers or their employees, or members of the public, it is possible that we obtain your personal data from another person using the EthicsLine site. We might process your personal data: if you are listed as a witness to the events being described in a Query or Report, if you are simply a third party named in the Query or Report, or if you are identified as the person engaged in the reported or queried behaviour in a Query or Report, we might process your personal data. The following personal data of yours provided by another person using the EthicsLine site may be processed: name and title, where and when an incident occurred, and details of the reported or queried behaviour including attempts and steps taken to conceal problems.

What is the purpose and lawful basis for processing your personal data?

The Company will use your different categories of personal information for the purposes set out below. Your personal data will be processed in accordance with applicable data protection law.

Purpose	Categories of Personal Data	Lawful Basis
To respond to your Query	<p>Contact Information:</p> <ul style="list-style-type: none"> Your title, name, your address, job title and place of work, telephone number, email address, and the best time for communication with you. <p>Query information:</p> <ul style="list-style-type: none"> your relationship to The Coca-Cola Company, your country of location (if relevant to the Query), and as well as any other information included in the free text section. 	<p>Legitimate interests:</p> <ul style="list-style-type: none"> to ensure we provide a safe working environment for all our employees. <p>Compliance with legal obligations:</p> <ul style="list-style-type: none"> to undertake any actions required under applicable law such as equality, anti-bribery and corruption legislation.
	<p>Query information:</p> <ul style="list-style-type: none"> Special category data provided in the free text section of the Query. 	<p>Substantial Public Interest:</p> <ul style="list-style-type: none"> the prevention or detection of unlawful acts at the Company.
To process your complaint and to conduct an investigate into the allegations in your Report.	<p>Contact information:</p> <ul style="list-style-type: none"> Your title, name, your address, job title and place of work, telephone number, email address, and the best time for communication with you. <p>Report information:</p> <ul style="list-style-type: none"> your relationship to The Coca-Cola Company, your country of location (if relevant to the Report), and as well as any other information included in the free text section. 	<p>Legitimate interests:</p> <ul style="list-style-type: none"> to ensure we provide a safe working environment for all our employees. <p>Compliance with legal obligations:</p> <ul style="list-style-type: none"> to undertake any actions required under applicable law such as equality, anti-bribery and corruption legislation.
	<p>Report information</p> <ul style="list-style-type: none"> Special category data provided in the free text section of the Report. 	<p>Substantial Public Interest:</p> <p>the prevention or detection of unlawful acts at the Company.</p>
To investigate a Report or Query in which you have been named, either as a witness, third party or alleged wrongdoer.	<p>Contact information:</p> <ul style="list-style-type: none"> Your title, name, your address, job title (including whether it is a supervisory or managerial role) and place of work (to the extent relevant to the Report or Query). 	<p>Substantial Public Interest:</p> <ul style="list-style-type: none"> the prevention or detection of unlawful acts at the Company.

	Report or Query information <ul style="list-style-type: none"> Personal data provided in the free text section of the Report or Query such as details of the issue. 	Compliance with legal obligations: <ul style="list-style-type: none"> to undertake any actions required under applicable law such as equality, anti-bribery and corruption legislation.
	Report or Query information <ul style="list-style-type: none"> Special category data provided in the free text section of the Report. 	Substantial Public Interest: <ul style="list-style-type: none"> the prevention or detection of unlawful acts at the Company.
To check on the level of service we have provided in response to the Query or Report	Contact information: <ul style="list-style-type: none"> Your title, name, your address, job title and place of work, telephone number, email address, and the best time for communication with you. 	Legitimate interests: <ul style="list-style-type: none"> to ensure we provide you with an adequate and effective whistleblowing process.

Who will have access to the personal information collected through EthicsLine?

Access to your personal data is strictly controlled and reviewed. Unless otherwise required by law, the personal data you provide shall only be shared with those individuals who need access to your personal data in order to answer your Query or investigate your Report. These individuals may include appropriate human resources, audit, legal, security, or management functions at the Company, employees within the Company's Ethics & Compliance Office, or technical staff at NAVEX.

Group Companies and Third Parties

The Company operates internationally and has locations around the world. As a result and in order to achieve the purposes described in this Privacy Notice, the Company may transfer, process, store or make accessible your personal data to other members of the [Coca-Cola Group](#). This includes destinations outside of the country where you are located, including territories that have not been deemed to offer adequate protection to personal data by the competent authorities for data protection.

Where we make such a transfer of personal data to other countries, we shall ensure appropriate safeguards are used and make such transfer on the condition that enforceable data subject rights and effective legal remedies are available. This may include where: (i) the transfer is to a country deemed by the competent authorities to provide adequate protection of your information; (ii) you have consented to the transfer (to the extent permitted by applicable data protection legislation); (iii) an approved data protection framework is in place; (iv) standard data protection clauses within agreements have been entered into which enable you to exercise your rights in accordance with the applicable data protection legislation; or (v) such transfer is otherwise permissible under data protection legislation.

Your personal data will also be shared with third parties who support our information technology or handle the whistleblowing process of our behalf. In particular, all information submitted in your Query or Report will be stored on the NAVEX database hosted by NAVEX Global ("NAVEX") in the USA.

People Identified in the Query or Report

If you identify any individuals in your Query or Report, those individuals may in due course be informed about the fact that a Query has been raised or a Report has been submitted which

includes their personal data. The Company shall not disclose your personal data to any individuals identified in your Query or Report.

How long will the Company keep your personal data?

Any information you submit in your Query or Report will be kept by the Company for as long as it is necessary to either answer your Query or investigate any incident disclosed in your Report or to comply with any legal or regulatory obligations to which the Company is subject.

We may sometimes come into possession of personal information, which is not related to the substance of the Query or the allegations in a Report as the case may be. If this is the case, the Company will not process this irrelevant data any further.

Unless the Company is required to retain your personal data for any legal reason, your personal data will be deleted or archived by the Company when it no longer needs it in accordance with its policies and procedures. If you have further questions about this, email compliance@coke-cola.com.

Security of your personal data

The Company will take reasonable technical, organizational, and legal measures to secure the information you provide when submitting a Query or Report such as provision of the information on a need-to-know basis, encryption, password protection. It also requires its third-party providers, including NAVEX, to adequately secure your personal data and not use it for any unauthorized purposes.

Please note, although we maintain safeguards to protect your personal information from unauthorized or inappropriate access, the transmission of information via the internet is not completely secure and we cannot guarantee the security of your personal information transmitted to the Company or provided through the EthicsLine.

Your Rights

You have a number of rights concerning the way that we use your information. At any time, you have the right to:

- request access to or a copy of any personal data the Company holds about you;
- request the rectification of your personal data, if you consider that it is inaccurate;
- request the erasure of your personal data, if you consider that the Company does not have the right to hold it;
- object to your personal data being processed for a particular purpose or to request that we stop using your information;
- request not to be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data;
- ask us to transfer a copy of your personal data to you or to another service provider or third party where technically feasible; and
- ask us to stop or start sending you marketing messages at any time by using the below contact details.

Any request for access to or a copy of your personal data may be made orally or in writing and we will endeavour to respond within a reasonable period and in any event within one month in compliance with applicable data protection legislation.

Automated Processing

We do not carry out automated decision-making or profiling in relation to your personal information.

Contacting us

If you have any questions about this Privacy Notice, you may contact the Company at compliance@coca-cola.com or the Privacy Office can also be contacted via email at: privacy@coca-cola.com.

You may also contact the data protection officer responsible for your country or region, if applicable. You can find a list of data protection officers and their contact details below.

If you have any concerns about the Company's use of your information, you also have the right at all times to lodge a complaint with a supervisory authority competent for your country or region. If you wish to exercise that right, you may contact the: (i) appropriate supervisory authority at the details contained at: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm which regulate data processing in the EU; or (ii) the Information Commissioner's Office, which regulates and supervises the use of personal data in the UK: Water Lane, Wycliffe House Wilmslow, Cheshire SK9 5AF, email: casework@ico.org.uk, website: <https://ico.org.uk>, helpline 0303 123 1113.

Changes to this Notice

The Company may amend this Privacy Notice at any time by posting the amended terms on EthicsLine. All amended terms will automatically take effect immediately on posting.

Data Protection Officers

You may contact the appropriate Data Protection Officer (DPO) at the following address:

Europe:

Data Protection Officer: Europe

COCA-COLA ITALIA SRL
VIALE EDISON 110 -BUILDING B-
20099 SESTO SAN GIOVANNI (MILAN), ITALY
DPO-Europe@coca-cola.com

Brazil:

Data Protection Officer: Brazil

Recofarma Indústria do Amazonas Ltda.
Praia de Botafogo, 374 – Botafogo
Rio de Janeiro/ RJ, Brazil

CEP:22250-907

encarregado.lgpd@coca-cola.com