

## **Russel Crowe Campaign Privacy Notice**

*Any capitalised terms used in this privacy notice (hereafter referred to as the “Privacy Notice”) are to be attributed the same meaning attributed thereto under the Bavaria takes you to Russel Crowe concert Terms and Conditions or the General Data Protection Regulation (the “GDPR”), unless otherwise defined herein.*

### **1. Introduction**

This Privacy Notice sets out how The General Soft Drinks Company Ltd ( “We”, “Us”, “Our” or “Organiser”), collects and processes Personal Data relating to the participants in the Bavaria takes you to Russel Crowe concert Campaign, as well as the steps we take to protect such information. We take data privacy seriously and we are committed to managing your Personal Data professionally and in compliance with the General Data Protection Regulation EU 2016/679 (“GDPR”, “Regulation”), the Data Protection Act (Chap 586 of the Laws of Malta) and any other Applicable Data Protection and Privacy Laws which may be amended from time to time.

### **2. Controller Details**

We, namely, The General Soft Drinks Company Ltd, a company registered in Malta, bearing company registration number C 1591 and having its registered address at Marsa Industrial Estate, Marsa, Malta, MRS 3000 are the Data Controller of your Personal Data.

If you wish to contact us about Our privacy practices, please feel free to do so by contacting Our Data Protection Officer (DPO) via email at [dpo@gsd.mizzi.com.mt](mailto:dpo@gsd.mizzi.com.mt).

Should you have any other queries relating to the Campaign, kindly reach out by email at [info@gsd.mizzi.com.mt](mailto:info@gsd.mizzi.com.mt).

### **3. Updates**

We may update this Privacy Notice in Our sole discretion including as result of a change in applicable law or processing activities. Any such changes will be communicated to you prior to the commencement of the relevant processing activity.

### **4. How and what Personal Data do We collect?**

We will exclusively collect your Personal Data from the receipt you deposit in the lottery boxes at the Supermarkets. When participating in the Campaign, We will collect and Process the following information about you:

- Your name and surname – to process your campaign entry and contact you if you are a winner;
- Your year of birth – to confirm your eligibility to enter the Campaign;

- Your mobile number and email address – to contact you if you are a winner and send your Prize.

In the event that the receipt submitted by the winner contains an invalid address and they are required to collect the Prize by visiting the premises, We may also request an Identification card to verify the identity of the individual collecting the Prize.

## **5. How do We use your Personal Data?**

We will process the Personal Data you have provided us for the purpose of fulfilling the Campaign, which includes enabling participation, assessing eligibility, communicating with you, and awarding the Prizes. Winners will be notified by phone, and via email within 1 day from the Draw.

Any copies of identification documents you provide will be duly noted for the purpose of confirming the identity of the individual and ensuring that the Prize is awarded to the rightful winner. Identity documents or copies thereof will not be retained.

## **6. Processing Requirements**

Please note that failure to provide your Personal Data prevents you from participating in the Campaign and renders you ineligible to win the Prize.

## **7. Legal Bases of Processing Personal Data**

We Process your Personal Data on the basis of the contractual relationship established with you through your acceptance of the Terms and Conditions and the submission of your receipt in the lottery boxes at the Supermarkets.

On the basis of Our legitimate interests or compliance with legal obligations, as applicable, we may also Process your Personal Data for the purposes of establishing, exercising or defending legal proceedings and confirming your eligibility to participate in the Campaign.

## **8. Recipients**

We may share your Personal Data with third party recipients who are selected individuals within Our Company on a need-to-know basis and third parties to whom disclosure may be required as a result of legal obligations imposed on us. We do not share your Personal Data with any entity located outside of the EU or EEA.

## **9. Automated Decision-Making and Profiling**

Your Personal Data will not be used for any decision solely taken on the basis of automated decision-making processes, including profiling, without human intervention.

## **10. Data Retention**

We retain your Personal Data exclusively for the period which is lawfully permissible to retain your Personal Data. Thereafter, your Personal Data shall be immediately and irrevocably destroyed.

Your Personal Data will be retained for a duration of twenty-nine (29) days, which covers the Promotion Period, as well as an additional week following the conclusion of the promotion in order for Us to manage any queries or complaints which We receive in relation to the Campaign.

## **11. Your Rights**

For as long as We retain your Personal Data, you have certain rights in relation to your Personal Data including:

- Request access to your personal information, allowing you to receive a copy of the data we hold and verify its lawful processing.
- Request the correction of any Personal Data we hold about you that may be inaccurate or incomplete.
- Request the deletion or removal of your Personal Data in situations where there is no legitimate reason for us to continue processing it.
- Object to the processing of your Personal Data, particularly when we rely on legitimate interests as the basis for processing, and there are specific reasons related to your situation that justify the objection.
- Request your Personal Data in a structured, commonly used, and machine-readable format, or ask us to transmit it to another controller of your choice.
- Request restrictions on the processing of your personal information.
- Be informed about the source of your Personal Data if it was not provided directly by you.
- Withdraw your consent at any time by contacting our DPO. The withdrawal of consent shall not affect the lawfulness of Processing based on consent before its withdrawal.

Please note that in terms of the applicable laws, your rights in relation to your Personal Data are not absolute.

You may exercise the rights indicated in this section by contacting our DPO at [dpo@gsd.mizzi.com.mt](mailto:dpo@gsd.mizzi.com.mt).

## **12. Keeping your data secure**

We shall keep your Personal Data secure and shall commit to take appropriate technical and organisational measures to protect your Personal Data against unauthorised or unlawful processing, including against accidental loss, destruction, storage or access. Your Personal Data may be stored in paper files or electronically on Our technology systems or on technology systems of Our IT service providers.

### **13. Complaints**

If you have any complaints regarding Our Processing of your Personal Data, please note that you may contact Us or Our Data Protection Officer at the details indicated above. You also have a right to lodge a complaint with the Office of the Information and data Protection Commissioner in Malta ([www.idpc.gov.mt](http://www.idpc.gov.mt)).