

MOLSON *Coors*



## **Data Protection Policy**

**Last Modified and Effective Date:** May 22, 2018

### **Introduction**

Molson Coors Brewing Company values and respects the privacy of every individual. We want you to be aware of how we collect, use, transfer, disclose, and store your information.

This Privacy Policy describes our practices in connection with the Information (defined in Section 3) collected from our websites, social media pages and promotional sites that we control, widgets and mobile sites and applications, our reward programs, blogs, interactive applications, emails and text messages (SMS and MMS) that we send to you, and other interactive features (each a "Site," collectively the "Sites"), through our online advertisements on third-party websites, and through vendors/sources from which we source information.

The information collected under this Privacy Policy may be used in the manner described herein by Molson Coors Brewing Company and its subsidiaries, including MillerCoors LLC, Molson Coors Canada, the operating companies of Molson Coors Europe, and Molson Coors International and their respective subsidiaries, affiliates, and affiliated brands, agents, trusted service vendors/providers, and corporate affiliates acting on our behalf (collectively, "Molson Coors"). When used in this Privacy Policy, the terms "we," "us," and "our" refer to Molson Coors (as defined above). For the purposes of applicable data protection and privacy law, the Molson Coors entity to whom you submit your Information and / or who operates the Site through which you communicate with us will be the controller of Personal Information (defined below) collected from you on the Sites.

We encourage you to read the entire Privacy Policy to familiarize yourself with our practices.

### **Policy**

1) This Privacy Policy applies to the information we obtain from individuals interacting with us and our Sites, products, and services. It does not apply to information we obtain in our capacity as an employer. You are not required to provide any Information when you interact with our Sites; however, if you elect not to do so, you may not have access to certain features of the Sites and other services. For information on how Molson Coors will process your information where you apply for a job with us, please see our separate fair processing notice which can be found *here*.

### **2) ACCESS RESTRICTED TO PEOPLE OF LEGAL DRINKING AGE**



**MOLSON COORS SITES AND ACCESS TO ALL ADVERTISING AND MARKETING INFORMATION ARE INTENDED ONLY FOR PERSONS OF LEGAL DRINKING AGE BASED ON THE JURISDICTION WHERE SUCH CONTENT IS BEING ACCESSED OR VIEWED. YOU WILL BE REQUIRED TO VERIFY YOUR DATE OF BIRTH PRIOR TO ENTERING OR INTERACTING WITH A SITE. AGE VERIFICATION PROMPTS MAY ALSO BE LOCATED WITHIN THE SITES.**

**WE DO NOT KNOWINGLY COLLECT INFORMATION FROM THOSE UNDER THE LEGAL DRINKING AGE AND REQUEST THAT SUCH INDIVIDUALS DO NOT PROVIDE ANY INFORMATION (DEFINED BELOW) TO US OR ACCESS OUR SITES. IF YOU ARE UNDER THE LEGAL DRINKING AGE IN YOUR JURISDICTION AND HAVE ENTERED OUR SITE BY PROVIDING A FALSE DATE OF BIRTH, YOU MUST IMMEDIATELY LEAVE THE SITE. IF YOU BELIEVE SOMEONE UNDER THE LEGAL DRINKING AGE HAS PROVIDED US WITH INFORMATION BY OBTAINING ACCESS IN VIOLATION OF THE APPLICABLE SITES' ACCESS RESTRICTIONS, PLEASE CONTACT US IMMEDIATELY AND THIS INFORMATION WILL BE REMOVED.**

**3) COLLECTION, USE, AND DISCLOSURE OF INFORMATION**

A. Types of Information: Molson Coors collects two types of information (collectively, "Information"):



- i. “Personal Information” is information about an identifiable individual as defined by applicable law. This information is generally collected when you register for an account, order merchandise, enter a promotion, interact with us on social media, contact customer service, or make inquiries on Sites. Examples of Personal Information include:
  - Contact information (e.g., name, home or physical address, email address, telephone number, and mobile phone number);
  - Billing and shipping information (e.g., credit/debit card number, expiration date, CVV code, billing and shipping addresses and contact information);
  - Username and passwords used to access Sites, including verification through social media platforms;
  - Social media account information (e.g., user name and passwords, profile images, and other images that you make available such as user-generated content);
  - Government identification numbers (which may include, if you are resident in the US, Social Security Number (in limited circumstances, for example if you win a sweepstakes or receive compensation that must be reported on government tax forms); and
  - Other Personal Information as deemed necessary or provided voluntarily.
- ii. “Other Information” is information collected from Sites, the Internet and third-party sources that does not specifically identify an individual. Examples of Other Information generally include:
  - Demographic information including date of birth, gender, interests, state, zip/postal code, time zone, country, and language, when it is not identifiable to a specific individual;
  - Preferences, shopping habits, and other lifestyle information, including product wish lists, order history, marketing preferences, and cell phone carrier;
  - Search queries;
  - Application usage data;
  - Server log file location, internet service provider, mobile or other device identifier (e.g., UDID and MEID), user agents, or IP address;
  - Information collected through cookies, tags, pixels, clear pixels, beacons, and other similar technologies;
  - Geo-location information such as your precise or approximate location;
  - Referring and exiting websites/URLs (including click through URL and pixel tags);
  - Browser and device information (including platform and version);
  - Other aggregated or anonymous information.

In certain jurisdictions, certain Other Information may be considered Personal Information. To the extent that any information is considered Personal Information by local law, we also treat this information as such and ensure that our handling of this Personal Information complies with all applicable data privacy and protection laws.



Similarly, if we combine Other Information with Personal Information, the resulting information will be treated as Personal Information for as long as it remains combined.

To the extent permitted by applicable law, any Personal Information may be combined with any Other Information that you provide to us through other channels, that is publicly available, or that we may otherwise obtain, including from third parties.

B. How We May Collect Information: Molson Coors may collect Information from the following:

- **From You** (e.g., information, such as date of birth, gender, hobbies and interests, consumption habits, zip code and your preferred means of communication when you voluntarily provide it);



- **Our Sites and Applications** (e.g., when you purchase a product on an e-commerce Site or opt-in to receive promotional emails);
- **Offline** (e.g., customer service inquiries, sweepstakes);
- **Online tracking technologies, including cross-device tracking** (e.g., service file logs, IP address, cookies, tags, pixels, clear pixels, gifs, bugs, beacons, and other similar technologies, some of which may enable Molson Coors or our service providers to identify you and collect information about you across devices and Sites);
- **Mobile usage** (i.e., information learned from our mobile application, such as your device's latitude and longitude or your device's location capabilities (e.g., GPS, Wi-Fi, Bluetooth signal, beacons, LED light chips or other similar technologies)) and 3<sup>rd</sup> party mobile pay applications or services.
- **Through your browser or device** (e.g., certain information, including your computer type, operating system name and version, IP address, Media Access Control (MAC) address, language, Internet browser type and version, and service provider that is often automatically collected by most browsers);
- **Through website analytics and advertising features** (e.g., Google Analytics, Google Analytics Demographics, Interest Reporting, Adobe Flash technologies including but not limited to Adobe Flash Local Stored Objects, Quantcast)
- **Other Sources** (e.g., public databases; joint marketing partners, social media platforms, from people with whom you are connected on social media platforms, public forums, and from other third parties).

C. How We May Use Information: To the extent permitted by applicable law, Molson Coors may use your Information to:

- Send administrative information to you, for example, information regarding the Sites and changes to our terms, conditions, and policies.
  - *Because this information may be important to your use of the Sites, you may not opt-out of receiving these communications;*
- Administer your account on any of our Sites, including rewards programs, sweepstakes, and contests for which you enter, including notifying you of the results.
  - *Please note that some promotions have additional rules, which could contain additional information about the use and disclosure of your Information;*
- Send you marketing communications and updates about Molson Coors for which you have opted in, including information about new products, events, and promotions (e.g., emails, push notifications, SMS and MMS messages);

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- Deliver customized or targeted advertisements to you based on Information we have obtained from your use of our Sites and advertising, Information we have obtained from third parties, or a combination of these sources, including past purchases or interests;
- Send you transactional emails about purchases made on our Sites, including order confirmation and abandoned cart emails;
- Fulfill your order and process your transactions/payments;
- Provide customer support and respond to your inquiries and fulfill your requests;
- Permit you to engage with or post on our social media pages and blogs, and any similar platform in which you choose to engage with us and other consumers. *Please note that any information you post or disclose on these platforms will become public information, and may be available to visitors to the Sites and to the general public;*
- Allow you to send messages to a friend (legal drinking age only) through the Sites. By using this functionality, you are telling us that you are entitled to use and provide us with your friend's contact information.

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- Conduct marketing research and analysis, and other business purposes, including but not limited to

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the effectiveness of our media buys, identifying trends and traffic/download patterns, and diagnosing problems;

- Personalize your experience on our Sites, including displaying content based upon your location, past purchases, interests, as well as Information collected across devices and Sites;
- Enhance and improve our products, services, content, advertising, and promotions;
- Comply with or enforce applicable legal requirements, including complying with laws outside of your country of residence;
- Respond to requests from governmental authorities, including those outside of the country of residence; and
- Use your Information for other purposes on an anonymized or aggregate basis, or
- As otherwise required by law.

We may also share your Information within Molson Coors in a manner consistent with this Privacy Policy. We may also share your Information with third-parties as described below.

#### **4) TRACKING TECHNOLOGIES**

A. **Cookies and Tracking Technologies.** Molson Coors utilizes “cookies”, “tags”, “pixels”, “clear gifs” and other similar tracking technologies on our Sites. A cookie is a text file that is placed on your computer or other mobile device when you access the Sites or the Internet. These technologies allow Molson Coors to collect information about your interaction with our Sites and advertisements. Examples of such information may include, but are not limited to: demographic information, browser type, IP address, pages viewed, activity conducted, and timing of your visit. You may at any time “opt out” of certain tracking mechanisms through your browser settings. However, disabling such features may prevent you from using certain features or taking full advantage of all of our offerings on our Site.

Different types of cookies are used for different purposes on our Sites, these are known as: strictly necessary cookies, performance cookies, and functionality cookies. Some cookies may be provided by an external third party to provide additional functionality to our Site and these are included below.

##### **Strictly necessary cookies**

These are cookies that are essential to fulfil an action requested by you, such as identifying you as being logged in. If you prevent these cookies by adjusting your browser settings we cannot guarantee how our Sites will perform during your visit.

##### **Performance cookies**



These are cookies used to improve our Sites, for example for analytics that let us see how our Site is being used and where to make improvements. These cookies are used to collect Information about how visitors use our Sites. The Information is collected in an anonymous form and includes the number of visitors, where visitors have come from to the Sites and the pages they visited.

**Functionality cookies**

These cookies enhance the performance and functionality of our Sites, often as a result of something you're doing as a user. For instance, we may personalize our content for you or remember your preferences.

The logo for Molson Coors, featuring the word "MOLSON" in a bold, blue, sans-serif font and "Coors" in a red, cursive script font. The logo is centered at the top of the page, with a thin yellow horizontal line above and below it.

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Molson Coors, our trusted service vendors/providers, and permitted third parties may also advertise our products

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trusted service vendors/providers, and permitted third parties do not have control over the tracking technologies utilized by third-party websites. As such, you should carefully review the privacy policies of those third-party sites to understand their tracking activities, if any.

B. Do Not Track Requests. We will automatically collect cookies and other information when you visit the Site. Due to this automatic collection, we do not currently honor browser based “do not track” requests. We currently participate in third party ad networks and use third party cookies as discussed above to track your visits across websites.

For information on how to opt-out of the collection of information by other tracking devices please refer to the “Choice/Opt-Out” section below.

C. Disabling Cookies on Your Browser. You may refuse or delete cookies on our Sites. Please refer to your browser Help instructions to learn more about cookies and other tracking devices and how to manage their use. If you choose to refuse or delete cookies, some of the functionality of our Sites may be impaired. If you use another computer or change browsers you will need to repeat the process of refusing or deleting cookies. For more information about cookies including how to set your internet browser to reject cookies please go to [www.allaboutcookies.org](http://www.allaboutcookies.org).

D. Ad Tracking. Certain devices may allow you to Limit Ad Tracking. Please refer to the settings on your computer or device for information on how to disable Ad Tracking.

## **5) TRANSACTIONS**

In some cases, we may use a third-party payment service to process purchases made through the Sites, including but not limited to reservation sites and eCommerce/online retail shop sites. In these cases, your Information may be collected by this third party and not by us, and will be subject to the third party’s privacy policy, rather than this Privacy Policy. We have no control over, and are not responsible for, this third party’s use or disclosure of your Information.

## **6) SHARING YOUR INFORMATION/DISCLOSURE TO THIRD-PARTIES**

At times, Molson Coors may make certain Information available to third parties (e.g., trusted vendors and providers) and within our family of companies/brands. We will only share your Information with these third parties and related entities in the ways that are described in this Privacy Policy. Molson Coors or persons that help us with our business activities are authorized to use your aforementioned information **only** as necessary to provide these services or as otherwise described below. If you wish to opt-out of having your information shared



with third parties in applicable circumstances (for example where your Personal Information is used for marketing/promotional purposes), please contact us as described below under “Privacy Inquiries.”

For example, Molson Coors may share the Information it collects about you in the following instances:

- With our trusted service vendors/providers to evaluate and improve our marketing and promotional efforts, content, products and services, to better understand customer interests and preferences, to provide you relevant information, and to conduct joint marketing programs;
- With our trusted service vendors that help us with business activities (e.g., processing credit card transactions, administering sweepstakes and contests, shipping your order, assisting us in Site operations, providing customer service, and delivering email communications);
- With our trusted service vendors/providers who work on our behalf and who do not have an independent right to use the Information to which they have access or that we disclose to them;



- In connection with a corporate change including a merger, acquisition, or sale of assets;
- In connection with promotions, for example, to third parties that are sponsors of a promotion, to provide lists of the names and contact information to the third party or otherwise in accordance with the rules applicable to the promotion;
- To third-party partners with whom we may enter into a relationship (e.g., joint marketing campaigns, sports alliances). Depending on the purposes for this sharing, Molson Coors may provide you with the option of whether this Information may be shared prior to sharing with such a partner. The subsequent use of the Information by the third-party partner will be governed by their own privacy practices and policies;
- As required by law, such as in conjunction with a government inquiry or to comply with a subpoena or similar legal process;
- When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request; and
- To any other third party with your prior formal consent to do so.

#### **7) LOCATION BASED SERVICES**

Molson Coors may collect the physical location of your device by, for example, using satellite, GPS, cell phone towers, beacons, or Wi-Fi signals. We may use your device's physical location to provide you with personalized location-based services and content, including advertising. We may also share your device's physical location, combined with information about what advertisements you viewed and other information we collect, with our marketing partners to enable them to provide you with more personalized content, including advertising and to study the effectiveness of advertising campaigns. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device's location, but if you choose to deny such uses and/or sharing, we and/or our marketing partners may not be able to provide you with the applicable personalized services and content. Unless you provide consent, this location data is collected anonymously in a form that does not personally identify you. For example, when you download a Molson Coors Site (including mobile application) on your device, you may have the opportunity to state that you would like to share your location.

For information about opting out of location based services, please refer to Settings in your device settings.

#### **8) SECURITY AND STORAGE OF INFORMATION**

The security, integrity, and confidentiality of your Information are extremely important to us. Molson Coors uses administrative, technical, and physical security to protect the Information we maintain to ensure that it is used according to this Privacy Policy. Please be aware though that, despite our best efforts, no security measures are perfect or impenetrable. If you have reason to believe that your Personal Information is not secure, please



contact us immediately in accordance with Section **15** below.

When you post on social networking platforms or other public platforms, the Information that you share is visible to other users and can be read, collected, or used by other users. Molson Coors is not responsible for Information that you voluntarily share or submit on these platforms. For example, if you list your name, age, and address on a social media site, this Information is public.

We will store your Personal Information for as long as is reasonably necessary for the purposes for which it was

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periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax, or accounting requirements.

In specific circumstances, we may store your Personal Information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your Personal Information or dealings.

#### **9) INTERNATIONAL USERS**

Any Information that you provide or that is collected may be transferred or accessed by entities around the world subject to the practices described within this Privacy Policy. Molson Coors, as a global company with local subsidiaries and affiliates, complies with all applicable local, state, and country laws regarding the collection, use, and disclosure of your Information.

For more information about how we transfer Personal Information in accordance with specific EU data privacy legislation please see the Additional Information for EU Residents section below.

#### **10) SOCIAL NETWORKS/ONLINE COMMUNITIES**

On certain Sites, we may enable you to access online communities for sharing Information such as messages, photos, and videos. You may only share this Information with persons of legal drinking age based on the jurisdiction from where you are accessing such Site. We may also enable you to post content from some Sites to your profile on other social networks. Please be aware that the privacy policy of the social networking site will apply to any content you post on or provide to that Site. In addition, when you post or share content or communications from our Sites with any third party social network you also allow us to share Information with that third party social network.

We cannot control any policies or terms of such third party social networks. For example, sharing such Information with Facebook may require us to implement cookies and/or APIs in order to facilitate the communication between our Sites and Facebook. That Information, shared through cookies and/or APIs, then becomes subject to Facebook's Data Policy, located at [https://www.facebook.com/full\\_data\\_use\\_policy](https://www.facebook.com/full_data_use_policy). As a result, we cannot be responsible for any use of your Information or content by a third party social network, which you use at your own risk.

#### **11) LINKED SITES**

Our Sites may contain links to third-party websites or applications not controlled by Molson Coors or covered by this Privacy Policy. If you submit Information to any of those websites, your Information is governed by their



privacy policies. We encourage you to carefully read the privacy policy of any website or application that you visit. We have no control or authority over third-party sites and are not responsible any Information that you may submit on that site.

Please note that if you provide Information to us via a social media site or participate in a social media site linked to our Sites, you consent to our use of your Information for any reason as if it were submitted to us directly via the Site.

## **12) ADDITIONAL INFORMATION**

Our Sites may include interactive programs that provide specific services from another company, such as “liking” or sharing content, often referred to as widgets. You may have the opportunity to submit Information, such as



your email address, for collection through a widget. A widget may also use cookies and/or collect usage data. Information collected by a widget is governed by the privacy policy of the company that created it.

### **13) PRIVACY INQUIRIES, CORRECTING YOUR INFORMATION, AND CHOICE/OPT-OUT**

#### **A. Privacy Inquiries**

If you have any questions or comments regarding this Privacy Policy, or if you would like to review, update, correct, or remove any Personal Information from our records, please contact us using the information below. Once we receive your request for removal, we will remove Your Personal Information from our records unless we have a specific legal requirement to retain your Personal Information. However, except where disclosure is required by law, we may decide not to grant access or make revisions where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in any given case, or when the rights of others would be violated by granting the access.

Molson Coors Brewing Company  
1801 California Street, Suite 4600  
Denver CO 80202 USA  
Email: [dataprotection@molsoncoors.com](mailto:dataprotection@molsoncoors.com)

Please note that email communications are not always secure; so please do not include any sensitive information, including credit card information, in your emails to us.

Any requested deletions or changes may not be effective immediately. We will aim to address your request as soon as practicable.

For residents of California (as required by California law), to obtain a list of any Personal Information Molson Coors has disclosed about you to third parties for direct marketing purposes during the preceding calendar year, please send a written, signed request to Molson Coors by mail at the address above.

For further information on how we ensure compliance with applicable EU data privacy and protection legislation, please see the "Additional Information for EU Residents" section below.

#### **B. Email Updates**

If you wish to have an e-mail address removed from our records, please follow the unsubscribe instructions included in emails you receive from us or follow the process set forth in subsection A above.



#### C. Mobile Marketing (SMS and MMS) Updates

If you choose to join a mobile marketing list, please be aware that there are typically messages and data costs associated with receiving SMS (text) or MMS (multimedia) messages. These will vary based on your wireless carrier and plan. You should check with your mobile carrier to determine what charges apply before signing up to receive our updates via your mobile device. If you would like to stop receiving messages from us on your mobile device, please reply to the message with "STOP" (or other message as applicable). You may also contact your mobile carrier for additional information on receiving or stopping mobile messages.

#### D. Location Services

If you have previously enabled your computer or mobile device to send us location information, you may be able to opt out from further allowing us to access such information by changing the settings on your computer or

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#### E. Push Notifications

If you wish to disable push notifications on your mobile device, please refer to the Settings on the mobile device.

#### F. Third Party Analytics

- i. Google Analytics: For more information on how to opt out of our use of Google Analytics and our use of its Advertising Features visit <https://tools.google.com/dlpage/gaoptout> and <http://www.google.com/safetycenter/tools/#manage-your-ads-preferences>,
- ii. Quantcast: For more information on or to opt-out of Quantcast, visit their site at <https://www.quantcast.com/opt-out>.
- iii. DAA Opt Out Page: Users can opt out of additional tracking and targeted advertising, including Google Analytics and Quantcast, via the Digital Advertising Alliance's (DAA) opt-out page and the Networking Advertising Initiatives' (NAI) opt-out page at <http://www.aboutads.info/choices/> and <http://www.networkadvertising.org/choices/>, respectively.

### **14) ADDITIONAL INFORMATION FOR EU RESIDENTS**

#### A. Legal Basis for Processing

All processing (i.e., use) of your Personal Information is based on one of a number of legal conditions. Generally, these will be:

- i. Your consent (for example, to place cookies which process Personal Information, or for marketing from our third-party partners);
- ii. The performance of our contract with you (e.g., to process your payment or shipping information in order to fulfil your order);
- iii. Compliance with a legal obligation (e.g., where we are required to disclose information to a court or a tax authority); and
- iv. Our legitimate interests, provided these do not override your fundamental rights and freedoms (e.g., where we carry out our own direct marketing to existing subscribers, subject to your right to opt-out of this at any time).

#### B. Rights of EU Residents

Subject to applicable law, as a resident of the EU, you may have some or all the following rights in respect of your

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- i. To obtain a copy of your Personal Information together with information about how and on what basis that Personal Information is processed;
- ii. To rectify inaccurate Personal Information (including the right to have incomplete Personal Information completed);
- iii. To erase your Personal Information (in limited circumstances, where it is no longer necessary in relation to the purposes for which it was collected or processed);
- iv. To restrict processing of your Personal Information where:
  - a. The accuracy of the Personal Information is contested;
  - b. The processing is unlawful but you object to the erasure of the Personal Information;
  - c. We no longer require the Personal Information but it is still required for the establishment, exercise or defense of a legal claim;
- v. To challenge processing which we have justified based on a legitimate interest (as opposed to your consent, or to perform a contract with you);
- vi. To prevent us from sending you direct marketing;
- vii. To withdraw your consent to our processing of your Personal Information (where that processing is based on your consent);
- viii. To object to decisions which are based solely on automated processing or profiling; and
- ix. To obtain, or see a copy of the appropriate safeguards under which your Personal Information is transferred to a third country or international organization.

In addition to the above, you have the right to lodge a complaint with your local supervisory authority (for example, the ICO in the United Kingdom).

In relation to these rights, please contact us using the details in Section 13 Please note that we may request proof of identity, and we reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. We will endeavor to respond to your requests within all applicable timeframes.

### C. International Transfers for EU Residents

You should be aware that we are a US headquartered company, and your Personal Information will routinely be transferred to and stored in the United States for processing.

In relation to both internal transfers and the use of affiliates, service providers or suppliers, if Personal

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information receives the same level of protection as if it remained within the EEA, including entering into data transfer agreements, using the EU Commission approved Standard Contractual Clauses, or by relying on certification schemes such as the EU - US Privacy Shield. You may have a right to details of the mechanisms under which your data is transferred outside the EEA.

#### **15) CHANGES TO THIS PRIVACY POLICY**

Your use of the Sites, and continued use of the Sites following any changes to the Privacy Policy, signifies that you agree with the terms and conditions of the Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use the Site or provide any Information to us.

We may update this Privacy Policy from time to time by posting additions or modifications to this page, so we encourage you to periodically review this Privacy Policy.

To help you stay current of any changes, we take the following two steps: (i) we note the date the Privacy Policy was last updated above; (ii) when we make a material change to the Privacy Policy, we post conspicuous announcement of such changes on the homepage of the Site next to the link to this Privacy Policy or we send an email to all users for whom Molson Coors (or the appropriate business unit) has Personal Information. Your use of any Site following the posting of any revised Privacy Policy shall be deemed acceptance of the revised policy, so we strongly recommend that you review the Privacy Policy periodically.