

Recruitment Privacy Notice

Suntory Beverage & Food Europe

Recruitment Privacy Notice

Last updated: July 2026

1. Introduction

1.1 This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share data about you during the application process. We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal data about you.

2. Who does this notice relate to?

2.1 This Notice gives you information about how we collect and use your personal data when you apply for roles at Suntory Group through our career website with Success Factors.

If applying for a role at Suntory through other channels, a Privacy Notice with specific details will be provided at the first point of contact with you.

3. Who collects the data?

3.1 **Orangina Schweppes Holding B.V.** ('OSH BV'), H.J.E. Wenckebachweg 123, 1096 AM Amsterdam, The Netherlands, as part of Suntory Group and its subsidiaries – (referred to as '**Company**', '**we**', '**us**', or '**our**' in this notice) is the controller of your personal data who gathers and uses certain data about you, on its own behalf and on behalf of our affiliated group of companies, namely:

-Orangina Schweppes France SAS - 40-52 boulevard du Parc, 92200 Neuilly sur Seine, France.

-Lucozade Ribena Suntory Limited (LRS) in Great Britain - 2 Longwalk Road, Stockley Park, Uxbridge UB11 1BA, United Kingdom.

-Lucozade Ribena Suntory Ireland Limited.in Ireland - 7th Floor, Chase Building, Carmanhall Road, Sandyford, Dublin, D18 Y3X2, Ireland.

-Schweppes SA for Spain - Calle Mahonia 2, 28043, Madrid, Spain.

-Schweppes Portugal Unipessoal Limited - Quinta da Fonte, R. Malhães nº 5, Ed. Q56, Piso 2, Lisbon, Portugal.

-Schweppes International Limited for the Netherlands - H.J.E. Wenckebachweg 123, 1096 AM Amsterdam, The Netherlands.

-Orangina Schweppes Polska Sp.z o.o. in Poland - Racing Avenue 6, 02-685 Warsaw, Poland.

-Schweppes Suntory Benelux NV/SA in Belgium - Rue du Cerf 127, 1332 Rixensart, Belgium.

4. What happens if this Notice is updated or your personal data changes?

4.1 This Notice will be monitor and updated when needed. Information linked to external documents are updated on a regular basis. If you have any questions about the updates of this notice or the last version update, please reach out to GDPR.info@suntory.com.

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during the recruitment process.

5. Definitions

5.1 Please find below some key definitions which are used when describing types of personal data:

Key term	Definition
Personal data	any information about an individual who is identified or identifiable.
Special categories of personal data	any information about you which relates to your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, your health as well as genetic data and biometric data for the purpose of uniquely identifying you.
Criminal offence data	any personal data relating to criminal convictions and offences or related security measures.
Criminal records	Any record containing criminal offence data.

6. Data protection principles

6.1 We will comply with the data protection principles when gathering and using personal data, as set out in our data protection policy. For more information on how OSH BV and its affiliate companies complies with these data protection principles, contact our DPO in GDPR.info@suntory.com

7. About the data we collect and hold on you

7.1 When you apply for a role and during the recruitment process, we collect, use and transfer different kinds of personal data about you which we have grouped together in the table below.

Description	Type of Personal data
Contact Data	Email address, telephone number
Identity Data	Full name, salutation, preferred name, country of residence, how the job opportunity was known, Suntory employee name (if referred), work visa status, salary expectations, notice period,

	available start date, information contained in your CV, and any additional data voluntarily provided by you.
Technical data	internet protocol (IP) address, browser type and version.

7.2 The table set out in Error! Reference source not found. of **Error! Reference source not found.** below summarizes the data we collect and hold ***up to and including the shortlisting stage*** of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

7.3 The table in **Error! Reference source not found.** of **Error! Reference source not found.** below summarizes the additional data we collect ***after the final offer and before making a final decision to onboard***, how and why we do so, how we use it and with whom it may be shared.

7.4 We seek to ensure that our data collection and processing is always proportionate. We will notify you of any changes to data we collect or to the purposes for which we collect and process it.

7.5 We will only use your personal data for the purposes for which we collect it for.

8. Automated Decision Making and profiling

8.1 We do not use automated decision making and profiling to screen your CV, assess your application for a role and make decision about whom to call for interview or who will be offered the role.

9. What happens if you don't provide us with your personal data?

9.1 If you do not provide the data requested when applying for a position, we will not be able to conduct the recruitment process with your participation as a candidate.

10. How do we collect personal data about you

10.1 We collect personal data from and about you using the following methods:

Collection method	Description
Direct interactions	Most of the personal data we collect, and use comes directly from you in person, by telephone, completion of forms or via email.
Automated technologies or interactions	As you interact with our websites and where we are permitted to do so by you, we automatically collect technical data. We collect this personal data by using cookies, server logs and other similar technologies. For information about the cookie operating on our websites, please refer to the Cookie Policy in Home
Third parties	Psychometric and/or cognitive reports.

11. Where data may be held

11.1 We have to share your personal data with third parties for the purposes set out in the table below.

11.2 Some of the third parties are based outside the United Kingdom (UK) and/or the European Economic Area (EEA) so their processing of your personal data will involve a transfer of personal data outside the UK and/or the EEA. Whenever we transfer your personal data outside of the UK and/or the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is in place:

11.2.1 We may transfer your personal data to countries that have been granted an **adequacy decision** by the European Commission and/or an adequacy regulation by the UK Secretary of State (as applicable) confirming that the country in question provides an adequate level of protection for personal data; or

11.2.2 We may **use specific contracts** approved by the European Commission and/or the UK (as applicable) which ensure that personal data is adequately protected. When we rely on this measure, we will conduct risk assessments and take appropriate measures to ensure that the third-party can comply with the provisions of such contracts and we have confirmed that the country to which the personal data is transferred provides enforceable data subject rights and effective legal remedies for data subjects are available there; or

11.2.3 A specific **exception applies** under applicable data protection law.

11.3 Please see below for details of the third parties we share your personal data with and where we send your personal data:

11.3.1 Service providers who provide systems administration services and access to platforms we use to advertise roles, assess your suitability for the role, invite you for an interview and offer you the role should you be successful at the interview:

Third party	Personal data shared	Reason for sharing personal data	Is your personal data sent outside of the UK/EEA?
SAP Success Factors	Personal data listed in table in point 7 above	Platform system management	Yes. Data servers are located in Singapore.
Criteria	Personal data listed in table in point 7 above	Psychometric and cognitive tests	Yes. Data is processed in the US.

ePfile – Rolling Arrays	Personal data listed in table in point 7 above	Offer letter and contract generation	Yes. Data will be processed in Singapore.
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11.4 Please contact us at GDPR.info@suntory.com if you want further information on transfers of your personal data outside of the UK and/or EEA or if you would like more information about the third parties we share your personal data with.

12. How do we keep your personal data safe?

12.1 We have appropriate security measures in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

12.2 We also have in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

12.3 In addition, we ensure your data security by leveraging the following:

1. the platform technical security features,
2. the HR security governance (Roles based permissions), users can only see/edit what their granted role authorize them to see/edit,
3. the recruiting processes operational controls.

13. How long we keep your data?

13.1 We keep the personal data that we obtain about you for no longer than is necessary for the purposes for which it is processed. How long we keep your data will depend on whether your application is successful and you become employed by us, the nature of the data concerned and the purposes for which it is processed.

13.2 We will keep application data (including interview notes) for a maximum period of two (2) years from the finalization of the recruitment process with no activity registered, after which the data will be destroyed. Candidate profiles in the system (Success Factors) will be kept for two (2) years after the last log in from the candidate. After this period all profile data will be automatically deleted.

If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but in an anonymized way.

13.3 If your application is successful, we will keep only the recruitment data that is necessary in relation to your employment. For further information, you will be provided with our SBFE Employee Privacy Notice in due time.

13.4 Further details on our approach to data retention and destruction of recruitment data are available in our **SBFE Personal Data Retention Policy** and relevant retention schedules. For more information please contact GDPR.info@suntory.com.

14. What are your rights under the data protection laws

14.1 You have a number of rights in relation to how we use your personal data; these are set out below in more detail:

14.2 **Access** - This enables you to receive a copy of the personal data we hold about you.

14.3 **Rectification** - This enables you to have any incomplete, outdated or inaccurate personal data corrected.

14.4 **Erasure** - This enables you to ask us to delete personal data where there is no good reason for us continuing to process it for example where you have withdrawn your consent for the processing of your personal data and OSH BV was relying on your consent to process it, you have objected to the processing, the processing of your personal data by OSH BV is unlawful or the personal data must be erased for OSH BV to comply with its legal obligations. Note, however, that we may not always be able to comply with your request for erasure because of specific legal reasons which will be notified to you, if applicable, at the time of your request.

14.5 **Objection** - This enables you to object to the processing of your personal data where we rely on our legitimate interest(s) (or that/those of a third party) and you object to processing on this ground as you feel the processing impacts your fundamental rights and freedoms. If you object, we can no longer process your data unless we can demonstrate legitimate grounds for the processing, which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

14.6 **Restriction** - This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) where you want us to establish the accuracy of the personal data; (b) where our use of the personal data is unlawful but you do not want us to erase it; (c) where you need us to hold the personal data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) where you have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it.

14.7 **Portability** - This enables you, in certain situations, to request transfer of your personal data to you or to a third party. We will provide your personal data (to you, or a third party you have chosen) in a structured, commonly used, machine-readable format.

14.8 **Your right to withdraw consent** - If we are relying on consent to process your personal data, you can withdraw your consent at any time, however, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

14.9 If you wish to exercise any of the rights set out above, please contact us at GDPR.info@suntory.com. If our legal basis for processing is consent and you wish to withdraw your consent, you can also use contact us at GDPR.info@suntory.com.

14.10 Before we can process your request, we may need information from you to help us confirm your identity. This is a security measure to ensure that rights are being exercised by the correct person and to ensure that personal data is not disclosed to, erased by or altered by any person who has no right to do so.

14.11 For more information on the rights set out above and when they apply, please contact us at GDPR.info@suntoru.com.

15. How to complain

15.1 You have the right to make a complaint about the processing of your personal data or in relation to the exercise of any of your rights at any time to GDPR.info@suntory.com

We are usually able to answer privacy questions or concerns promptly and effectively. However, If you are not satisfied with the response you receive, you can contact your relevant Data Protection Authority in your country.

If you are resident of the EU, you can also contact the **Autoriteit Persoonsgegevens** in the Netherlands, which is our lead supervisory authority for all our business in the EU.

Contact details of the Supervisory Authorities relevant to SBFE:

- (i) Belgium Autorité de la protection des données / Gegevensbeschermingsautoriteit (APD-GBA): www.autoriteprotectiondonnees.be / www.gegevensbeschermingsautoriteit.be
- (ii) Ireland Data Protection Commission: www.dataprotection.ie
- (iii) France Commission Nationale de l'Informatique et des Libertés (CNIL): www.cnil.fr
- (iv) **Netherlands Autoriteit Persoonsgegevens**: www.autoriteitpersoonsgegevens.nl
- (v) **Poland Urząd Ochrony Danych Osobowych** (Personal Data Protection Office): www.uodo.gov.pl
- (vi) Portugal Comissão Nacional de Proteção de Dados (CNPd): www.cnpd.pt
- (vii) Spain Agencia Española de Protección de Datos (AEPD): www.aepd.es
- (viii) United Kingdom Information Commissioner's Office (ICO): www.ico.org.uk
- (ix) **Luxembourg CNPD**: <https://cnpd.public.lu/en.html>

15.2 If you have any questions about this notice, including any requests to exercise your legal rights, please contact us at GDPR.info@suntory.com.

16. Use of AI Disclaimer

During the recruitment process, your Suntory Beverage & Food Europe contact may ask for your permission to use Microsoft Copilot to transcribe and summarise our discussion, so that we can focus fully on our conversation with you. Copilot will not be used to score, rank or assess you, or to infer personality traits or emotions – all hiring decisions are made by people. Participation is entirely optional and declining will not affect your application. In Suntory we are committed to ensuring an

inclusive recruitment process – and so if you require any adjustments for the meeting please do not hesitate to let your Suntory contact know. If Copilot is used, you may request a copy of the notes generated.

Schedule: The tables summarising the personal data we collect (Part A and Part B) are published in a separate document: Recruitment Privacy Notice - Schedule.