

	Title:	PRIVACY LAW COMPLIANCE POLICY
Molson Coors Canada Policy	Owner:	VP Legal & Industry Affairs
	Scope:	Molson Coors Canada
	Effective Date:	July 2014

GENERAL POLICY STATEMENT AND BACKGROUND

Molson is the pre-eminent brewer in Canada, and as such, has a responsibility to promote compliance with all applicable laws, including privacy laws such as the Personal Information Protection and Electronic Documents Act and applicable provincial legislation (individually and collectively, the “Privacy Act”) and the Canadian Anti-Spam Legislation Act (“CASL”). The purpose of this Policy is to foster an understanding of, and compliance with, the privacy laws and CASL that apply to Molson’s business through the implementation of proper procedures for dealing with personal information and Commercial Electronic Messages (CEM).

NOTE THAT ANY FAILURE TO COMPLY WITH THIS POLICY MAY RESULT IN DISCIPLINARY ACTION, UP TO AND INCLUDING TERMINATION.

PERSONAL INFORMATION PROTECTION AND ELECTRONIC DOCUMENTS ACT

The general rule under the Privacy Act is that a company must first obtain a person’s consent for the collection, use or disclosure of personal information for commercial purposes.

CANADIAN ANTI SPAM LEGISLATION

The general rule under the CASL is that a company must first obtain a person’s consent prior to sending CEM. CASL prohibits businesses (and employees) from sending CEM unless the recipient has given consent (which can be either express or implied); therefore Molson must have consented before sending a CEM. An email or any other electronic communication will be deemed to be a CEM when the message has as its purpose to encourage participation in a commercial activity. Consents are implied if sender and recipient have a personal relationship with the recipient or are already engaged in a commercial activity or if CEM do not promote, offer, advertise or encourage participation in a commercial activity.

TEN GUIDING PRINCIPLES

Molson has adopted the Act’s Ten Guiding Principles as set out below.

Every Molson employee must comply with all aspects of privacy legislation and CASL including the Ten Guiding Principles. Contact the Legal Department with any questions about this Policy.

Principle 1 – Accountability.

Molson is responsible for the personal information under its control and CEM sent on its behalf and shall implement procedures to protect personal information and respond to inquiries and complaints.

Principle 2 - Identifying Purposes for Collection of Personal Information.

Molson shall identify the purpose for which it collects, uses or discloses personal information at the time the personal information is collected.

Molson Coors Canada Policy	Title:	PRIVACY LAW COMPLIANCE POLICY
	Owner:	VP Legal & Industry Affairs
	Effective Date:	July 2014

Principle 3 - Obtaining Consent.

Molson shall obtain the consent of individuals to whom the personal information relates for the collection, use or disclosure of the information, or in the case of a CEM, to ensure that the recipient of the CEM previously agreed to receive it.

Principle 4 - Limiting Collection of Personal Information.

Molson shall limit the collection of personal information to that which is necessary to meet the purpose communicated to the individual at the time the information was collected.

Principle 5 - Limiting Use, Disclosure and Retention of Personal Information.

Molson shall not use or disclose personal information for a purpose other than that for which it was originally collected except with the individual's consent or as required by law. Molson shall retain personal information only as long as necessary for the fulfillment of those purposes.

Principle 6 - Accuracy of Personal Information.

Molson shall ensure that personal information used by it is accurate, complete and up-to-date as is necessary for the purpose for which it is to be used.

Principle 7 - Security Safeguards.

Molson shall implement safeguards designed to protect personal information appropriate to the sensitivity of the information.

Principle 8 - Openness Concerning Policies and Practices.

Molson shall be open about privacy policies and personal information practices and shall make such policies and practices readily available to consumers and employees.

Principle 9 - Consumer and Employee Access to Personal Information.

Molson shall afford individuals the right to challenge the accuracy and completeness of the information and have it corrected where appropriate.

Principle 10 - Challenging Compliance.

Molson shall designate an officer to be responsible for compliance with privacy obligations to whom individuals will be able to address a challenge concerning the company's privacy practices.

ADMINISTRATION OF THIS POLICY

APPOINTMENT OF A CHIEF PRIVACY OFFICER

The Molson Chief Legal Officer shall appoint a Chief Privacy Officer. The Chief Privacy Officer will be responsible for Molson's compliance with the Act and other applicable privacy laws and CASL and will be the point person for addressing access requests and complaints. Please contact the Legal Department if you require contact information for the Chief Privacy Officer.

APPOINTEMENT OF A PRIVACY COMMITTEE

The Chief Privacy Officer will form a Privacy Committee with representatives from each of the following functions: 1. Relationship Marketing; 2. Human Resources; 3. Customer Service (1-800); 4. Consumer Brand Marketing; 5. Sales; 6. Finance; 7. Informational Technology, and 8. Internal Audit. Each Committee Member

Molson Coors Canada Policy	Title:	PRIVACY LAW COMPLIANCE POLICY
	Owner:	VP Legal & Industry Affairs
	Effective Date:	July 2014

shall be familiar with privacy law matters and promote compliance generally within his/her functional area. The Privacy Committee shall meet on a bi-annual basis to discuss any pertinent privacy issues and to address any concerns or complaints. The Privacy Committee shall meet more frequently on an ad hoc basis if requested by the Chief Privacy Officer or a Committee Member. The Privacy Committee will conduct appropriate reviews, as needed, to ensure compliance with privacy laws.

Third Party Contracts: In the event that Molson enters into contracts with third parties who will be collecting, storing or administering personal information on Molson's behalf, the Molson person negotiating the contract should use commercially reasonable efforts to ensure that the third party will comply with this Policy and all applicable privacy legislation. Please contact the Legal Department for assistance.

MOLSON EMPLOYEE PERSONAL INFORMATION

Molson collects personal information from employees including: name, address, phone number, date of birth, SIN number, civic status, gender, communication language, previous employment, dependents' information, banking information, salary, date of hire, tax credit information, emergency contact information, benefits coverage information, investment options, driver's license information and any job-related information.

Molson and its service providers shall comply with all aspects of privacy laws and this Policy when dealing with employee personal information in the custody and control of Molson

All Molson employees are entitled to have access to their personal information for the purposes of updating it and ensuring accuracy and completeness. Any Molson employee wishing to have access to their personal information on file shall contact his/her Human Resources representative.

MOLSON CONSUMER PRIVACY POLICY

The Molson Consumer Privacy Policy is set out below:

MOLSON CONSUMER PRIVACY POLICY

1. General Principles

Molson is committed to preserving and safeguarding your right to privacy. This Consumer Privacy Policy (the "Policy") sets out the manner in which Molson collects, uses, discloses, communicates with you and otherwise manages your personal information. You agree that Molson may, in its sole discretion, modify the Policy at any time with or without notice to you. The revised Policy shall be posted on the Molson website located at www.molson.com and every other Molson owned/controlled/managed Canadian website (individually and collectively, the "Website"). You should review the Policy on a regular basis for any such changes. The Website may contain links to other non-Molson websites. Molson is not responsible for the privacy practices or content of such other websites.

2. Information We Collect

Relationship Marketing. Molson may collect information about you when you register to become a member of any Molson group. The information collected may include your name, address, telephone number, email address, mobile phone number, date of birth, gender and facts regarding your consumer habits and preferences. Molson may send you CEM but only if consent has been given or if an implicit consent exists.

Molson Coors Canada Policy	Title:	PRIVACY LAW COMPLIANCE POLICY
	Owner:	VP Legal & Industry Affairs
	Effective Date:	July 2014

Website. Molson may collect information about you when you .access the Website. Molson keeps a record of the email addresses of those who communicate with us via the Feedback tool. Molson also collects both aggregate and user-specific information on what web pages consumers access or visit, and information volunteered by the consumer, such as survey information and contest application information. Molson may use the collected information and send you CEM, but only if consent has been given or if an implicit consent exists.

Purchases. Molson may collect information about you when you purchase products from it by telephone, mail, fax or on-line. The information collected may include your name, address, company name, telephone number, fax number, email address and credit card information.

Enquiries and Complaints. Molson may collect information about you if you contact Molson with a consumer complaint or request. The information collected may include your name, address, telephone number, email address, date of birth and facts regarding the complaint or request.

Marketing Research. Molson may collect information about you if you participate in any Molson marketing research. The information collected may include your name, address, telephone number, email address, date of birth, gender, income and facts regarding your consumer habits and preferences.

Contests and Promotions. Molson may collect information about you if you participate in any Molson contest or promotion. The information collected may include your name, address, telephone number, email address, mobile phone number, date of birth, gender, facts regarding your consumer habits and preferences, and facts relevant to the contest or promotion participation.

3. Use of Personal Information

After collecting your personal information for purposes outlined in section 2 above, Molson uses your personal information for one or more of the following purposes: (1) to identify who you are; (2) to improve the content of the Website and other Molson communications; (3) to contact you for marketing purposes, when consent has been given or if an implicit consent exists; (4) to improve our products and services; (5) to process and ship your order for products; or (6) to process your complaint or request.

4. Use of Cookies

Cookies are simple text files that web browsers place on computer hard drives when sites are visited. Cookies cannot damage files, nor can they read information from a user's hard drive. Molson uses cookies to help us measure the number of visits, average time spent, page views and other statistics relating to use of our Website. Our Cookies pose no security risk to you as they contain no personal information, only a special string that tells the service that you are a past user of the Website. Please note that certain features on the Website may not function if you do not accept Cookies. Therefore, before installing such computer program please accept any Cookies that Molson sends to your computer. You can turn off the Cookie warning by selecting preferences or options from your browser's menu, and turning off the warning toggle.

5. Disclosure and Transfer of Personal Information

Except as set out below, Molson will not sell, transfer or disclose any of your personal information to any third party without your consent.

Certain personal information may be disclosed or transferred to third parties solely for the purpose of processing or arranging delivery of your order or processing your complaint or request. Molson may also disclose or transfer

Molson Coors Canada Policy	Title:	PRIVACY LAW COMPLIANCE POLICY
	Owner:	VP Legal & Industry Affairs
	Effective Date:	July 2014

your personal information to third parties who administer contests, promotions and on-line activities on its behalf. In addition, Molson must provide your personal information in response to a search warrant or other legally valid enquiry or order, or to an investigative body in the case of a breach of an agreement or contravention of law, or as otherwise required by law. Molson may also provide your personal information to assist it in collecting a debt owed by you.

6. Security Safeguards

Molson understands the importance of protecting your personal information, and has implemented measures designed to protect personal information in its custody and control. We maintain reasonable administrative, technical and physical safeguards in an effort to protect against unauthorized access, use, modification and disclosure of personal information. Unfortunately, no collection or transmission of information over the Internet, through new media or otherwise can be guaranteed to be 100% secure, and therefore, we cannot ensure or warrant the security of any such information.

Where applicable, your access to certain of your personal information online or through new media may be protected with a password you select. We strongly recommend that you do not disclose your password to anyone. We will never ask you for your password in any unsolicited communication such as letters, phone calls, email or SMS messages.

7. How to Contact Molson

If you do not want to receive email or other communications from Molson, please either modify your communication preferences on the Website, go to the "contact us" link on the Website and send an email with "unsubscribe" in the subject line, or follow the unsubscribe instructions related to other new media tools where applicable. If you would like to review or update the personal information in your customer record or withdraw your consent, where possible, for the collection, use or disclosure of your personal information or if you have any inquiries, please contact:

Chief Privacy Officer
 Legal Department
 Molson Coors Canada
 1555, Notre-Dame St. East
 Montréal (Québec) H2L 2R5

POSTING OF CONSUMER PRIVACY POLICY

The Molson Consumer Privacy Policy shall be posted on molson.com and on any other Molson website. Those Molson employees managing current Molson websites or developing new Molson websites shall be responsible for ensuring the Consumer Privacy Policy is properly posted and adhered to.

Approvals

Date	Position	Name	Signature
July 2014	VP, Legal & Industry Affairs	Nathalie Delisle	
July 2014	Chief Administrative Officer	Kelly Brown	

Molson Coors Canada Policy	Title:	PRIVACY LAW COMPLIANCE POLICY
	Owner:	VP Legal & Industry Affairs
	Effective Date:	July 2014

Revision History

Date Revised	Description of Change
September 15, 2003	Original
December 2008	Revised
July 2014	Revised