

Privacy Notice

Who are we?

A key driver to delivering **A Better Tomorrow™** is our ethos, which sets out our values and guides our culture and behaviours across the entire Group, ensuring an organisation that is future-fit for sustainable growth. These five key behaviours are bold, fast, empowered, diverse and responsible.

At BAT how we deliver our business results is fundamental to achieving our purpose of A Better Tomorrow™: acting ethically and in line with the values expressed by our ethos will deliver a long-term sustainable business that meets the expectations of our consumers, employees, investors, and society as a whole.

At BAT we are committed to protecting the privacy of our candidates, and also users of this eRecruitment Site ("**Site**"). We will ensure that the information you give to us (for example via this Site) is only used for the purposes set out in this Privacy Notice. We are committed to acting responsibly and with integrity with regard to protecting your privacy rights and freedoms.

For the purpose of this Privacy Notice and applicable data protection legislation (including but not limited to the UK Data Protection Act 2018 ("**UK DPA**") and the EU General Data Protection Regulation, the primary company responsible for your personal data is **British-American Tobacco (Holdings) Limited** whose address is Globe House, 4 Temple Place, London WC2R 2PG ("**BAT Holdings**").

BAT Holdings is responsible for any personal information that you:

- Provide in this Site (e.g., registration details, name, email address, background details); or
- Provide to one of our recruitment agents based in the UK in the context of a permanent or temporary role (e.g., email address, CV, cell number); or
- Provide to a third party recruitment agency who passes our UK based recruitment colleagues your details for consideration (e.g., email address, CV).

We also may share or transfer your details with or to other companies in the BAT Group. This is because you may be applying for a job (permanent or temporary) in another BAT Group company and BAT Holdings has the role of being initially receiving, and being responsible for, your personal data until such point it is passed to another BAT Group company.

At this point, it is the **second BAT Group company** receiving your personal data which will then be solely responsible for any other of your personal data you provide to them subsequently in connection with any job application. They may serve you with another Privacy Notice similar to this one if required to do so by law.

Companies which are responsible for your data in this context are known as 'data controllers' and you may see reference to this within this Privacy Notice.

However, if you apply for a job (permanent or temporary) with another BAT Group Company which is listed below this Privacy Notice **shall apply to all processing of your personal information within the recruitment application process (for ease, we have abbreviated to refer to these companies as "Centre Entities" or a "Centre Entity")**). Remember, if you are unsure which Centre Entity applies to you then please contact us.

Centre Entities

- British American Tobacco p.l.c;
- British-American Tobacco (Holdings) Limited
- BATLaw Limited
- BATMark Limited
- British American Tobacco (GLP) Limited
- British American Tobacco (Investments) Limited
- British American Tobacco Exports Limited
- British American Tobacco UK Limited
- Nicoventures Trading Limited

This Privacy Notice gives you details on how we collect, use and process your personal information, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your rights.

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1. What information do we collect about you and how we use your information?

Please see information below which sets out what personal information we hold about you, the reason why we use it and the law lets us do this.

What purpose do we use your information for?

We use your information about you to ensure that we can respond to any queries and contact you if you request us to do so, for storing your details (and updating them when necessary) on our database and to enable you to submit your CV for general applications, to allow you to apply for specific jobs, so that we can contact you in relation to job opportunities or respond to any query you have asked us to answer, research that we conduct for statistical purposes, to administer our website for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes and to ensure the effective operation of software and IT services procured by us (including disaster recovery). We may also screen your CV prior to considering your application further.

Types of information we collect about you.

- Name;
- your email address and contact details;
- your country/city of residence;

- information in relation to your background;
- education history;
- interview notes and any assessment results;
- Images and recordings of any video interviews (if relevant);
- employment history, vocation/profession;
- extra information that you choose to tell us.

What is our legal basis for using your personal information in this way?

The UK DPA says that we can only use your data if we have a 'legal basis' to do so. The law also sets out what those legal bases are and that we should explain this to you in this Privacy Notice.

We are allowed to use your personal information where it is in our interests to do so, and those interests are not outweighed by any potential prejudice to you. This is what's known as the 'legitimate interests' legal basis.

We believe that our use of your personal data is within a number of our legitimate interests, including but not limited to:

- To identify and recruit appropriately skilled and experienced talent;
- To ensure that the candidates we recruit have a sound background and by recruiting such individuals we do not attract risks to our organisation (e.g., we may run a background check on you to ensure that before you start with BAT you have no criminal convictions which may indicate that you may not be appropriate for the job);
- To ensure that we administer an efficient recruitment process to attract appropriate talent to our organisation;
- To provide an easy and simple way for applicants to apply for jobs at BAT;
- To help us understand visitors to the Site better and provide more relevant information and services to them;
- To ensure that the Site runs smoothly help us keep our systems secure and prevent unauthorized access or cyber-attacks.

What purpose do we use your information for?

We may use your personal information for a number of purposes. Such as to email you with our job alerts and information about job opportunities relevant to you (if you have subscribed to such communications on registration). We also may share your personal information with other members of the BAT group of companies worldwide for recruitment purposes when you have asked us to do so (e.g. if you have applied for a role). We may also consider your CV and sharing with a hiring manager so that they can see if you are good for the job.

Types of information we collect about you.

- Name; and
- CV (and all details contained therein);
- (preferred) location and interests; and
- your email address and contact details.

What is our legal basis for using your personal information in this way?

To receive job alerts and similar email communication, we rely on your consent to provide you with notifications when you register on our Site.

If you have made an application for a role at a Centre Entity the following also applies to you:

What purpose do we use your information for?

We will use your personal information to assess your qualifications for a particular job or task, to verify information we have received, using third party resources (such as psychometric evaluations or skills tests), or through information requests (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws) and (if applicable to your application) retain certain records associated with sponsoring a non-UK or Irish national for a sponsored working visa (such as a Skilled Worker or Global Mobility visa) visa as mandated under local UK laws.

Types of information we collect about you.

- Name;
- your email address and contact details;
- your country/city of residence;
- information in relation to your background;
- education history;
- employment history, vocation/profession;
- information included with your application such as reference /referee names; and
- any information that you have included in your application for a specific role.

What is our legal basis for using your personal information in this way?

To pursue the legitimate interests we have. For example, it is in our legitimate commercial interest to be able to consider your details as a candidate to ascertain if you are the correct person for the role.

We may need to use your information to comply with a legal obligation that we are subject to in a specific jurisdiction for example checking identity to establish your right to work.

2. Where does the information we use about you come from?

Your information that we collect is based on information that you share with us which include:

- when you register with on this Site (for example when you sign up to be a registered user);
- where you contact us proactively, usually by phone, email or via social media; and/or where we contact you, either by phone or email you may provide us with information during such communication.

We also collect other information from other sources.

- If you choose to apply or submit information using Facebook or similar social media sites, we import the requested information from your social media account and we

make it part of your profile. For details on how your personal data is handled and processed by the social media Site that you have used to submit your information, please consult the Privacy Notice on that social media site.

- We also collect your personal information when you visit the Site such as technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We use the information for statistical reporting and do not link it to any named individuals.
- We also receive and use your personal information when you provide it to a recruitment agent working in the UK (either for a Centre Entity role or another role with a BAT Company but the recruitment colleague at BAT is in the UK), or if you have applied for a role through a third party agency which will pass us your details;
- If you are applying for a role with a Centre Entity, after you have made the application, we may seek more information about you from other sources generally including from third parties. For example, we may receive information on you from those organizations that you have asked us to use for professional or academic references such as a previous employer or a college or university.

BAT will not intentionally collect any information about registered users to this Site who are under eighteen years of age. If BAT becomes aware that a child has provided any information this will immediately be deleted from BAT's records.

3. Who do we share your information with?

We will share your personal information primarily to ensure we provide you with the most relevant and up to date news, content and events, or to ensure we can respond to any query quickly and expeditiously. Unless you specify otherwise, we may share your information with any of the following groups:

- Any of our Group BAT companies. As identified in this Privacy Notice, your personal information will be shared with the BAT company responsible for the job that you are applying for. You may apply for several different jobs. Depending on the location of the job that you choose to apply for your personal information could be transferred inside and outside the UK for such purposes as enable them to continue any local recruitment services to you worldwide. You may like to know that the place of central processing administration of personal information in the context of recruitment activities is in the EU and via a BAT company called British American GBS Recruitment SRL in Romania. This BAT company undertakes the majority of recruitment processing on our behalf. To contact this entity's Data Protection Officer, please use the contact details provided at the end of this Privacy Notice.
- Tax, audit, or other authorities, when we believe that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation) or in order to help prevent fraud or to enforce or protect the rights and properties of BAT or its subsidiaries; or protect the personal safety of BAT employees, third party agents or members of the public;
- Third party service providers who perform functions on our behalf (including local recruitment agents, email communications service providers and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems), third party outsourced IT providers where we have an appropriate data processing agreement (or similar protections) in place;
- If a BAT entity merges with or is acquired by another business or company in the future, we may share your personal data with the new owners of the business or company (and provide you with notice of this disclosure);

- Circumstances may arise where, whether for strategic or other business reasons, BAT decides to sell, buy, merge or otherwise reorganise businesses in some countries. Such a transaction may involve the disclosure of your personal information to prospective or actual purchasers, or the receipt of it from sellers. It is BAT's practice to seek appropriate protection for personal information in these types of transactions.

We do not share, rent or trade your information with third parties for marketing or promotional purposes.

Please note that we may ask you to take application tests by using testing tools of third parties for which you will have to register as user. The third party provider may allow you to use your test results for applications with entities other than BAT, so that your data is stored to your account with the provider beyond the duration of your application process with BAT. You will be provided for separate and detailed information by the third party provider before logging on to its respective service.

4. How long do we keep your information?

We will not keep your personal data for any longer than is necessary for the purposes for which we collect it. If you are not successful for a job application, we may retain your details and CV so that your information is available already in your profile. However, you can delete your profile and registration at any time – it is within your control.

In addition, we may be required by law to retain your data e.g. in respect of equal opportunity claims, or to defend or bring legal claims. Where we are subject to a regulatory or other legal obligation in a specific jurisdiction which requires us to keep data for a specified period, we will comply with those regulatory requirements with respect to the retention of such data e.g. Visa record keeping requirements in the United Kingdom.

5. How do we ensure your information is safe with us?

We care about protecting your information. That is why we put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data.

We are committed to taking appropriate steps to protect your information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures, including encryption measures and disaster recovery plans.

Unfortunately, there is always risk involved in sending information through any channel over the internet. The information you send over the internet entirely at your own risk. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted over the internet.

If you suspect any misuse or loss of or unauthorised access to your personal information, please let us know immediately. Please raise your concern by contacting us (using the details below) or by using the Contact us section of this website, in the first instance, and we will investigate the matter and update you as soon as possible on next steps.

If you receive any emails from us that you suspect are not from BAT please report them here: phishing@bat.com

6. What are your rights under data protection law?

You have rights under data protection law in relation to our use of your information, including to:

- request access to your information, which you can do by emailing us at recruitment_dataprivacy@bat.com
- update or amend your information if it is inaccurate or incomplete;
- object to certain uses of your information in situations where we rely on our legitimate interests to do process your information;
- request the deletion of your information, or restrict its use, in certain circumstances (for example you can request that we erase your information where the information is no longer necessary for the purpose for which it was collected (unless certain exceptions apply));
- where you have given your consent to process your personal information you are entitled to withdraw this
- ask for the return of information you have provided to us, to use for your own purposes (often called your right to data portability) where the processing is based on your consent or for the performance of a contract; and the processing is carried out by automated means;
- lodge a complaint with the Information Commissioner's Office (www.ico.org.uk/global/contact-us/email/) for individuals in the United Kingdom. For all other EEA supervisory authorities please see the list of the privacy regulators for each Member State (along with contact details) on the following website: https://edpb.europa.eu/about-edpb/board/members_en

7. Automated Decision Making

We may make automated decisions when selecting who to include on a shortlist for interview via CV screening methodology or via a general criteria assessment questionnaire. If you would like to know more about this (such as information on the logic involved in the decision and the envisaged consequences for you), please contact us.

8. How to Contact Us

If you have any comments or suggestions concerning this Privacy Notice, please contact us using the contact details stated in the job specification relating to the vacancy for which you have applied or at recruitment_dataprivacy@bat.com or data_privacy@bat.com.

9. Changes to this Privacy Notice

We keep this Privacy Notice under regular review, please check back at this page in the Site for updates. This Privacy Notice was last updated on April 12th , 2022.