

MySupplier Privacy Policy

1. ABOUT US

JT International SA (“**JTISA**”) and JTI’s group companies (together, “**JTI**”) use the MySupplier Supplier Life Cycle Management Platform (the “**Platform**”) as a central application management tool to manage its suppliers. JTI suppliers can register an account on the Platform, which allows the JTI purchasing team to qualify the suppliers, evaluate them, and manage the life cycle of the products and services that they provide to t JTI.

This Privacy Policy (“**Privacy Policy**”) (together with any other documents referred to in it) sets out the basis on which we process personal information that we collect from you or that you provide to us, in connection with your access to and use of the Platform.

When this Privacy Policy refers to “**JTI**”, “**we**”, “**us**” or “**our**”, it refers to the relevant JTI company that is responsible for your information under this Privacy Policy (the “**Data Controller**”). The JTI entity assisting you in the registering process in your country of residence shall be acting as Data Controller.

The practices set out in this Privacy Policy are subject to applicable laws in the countries and or regions in which we operate. This means that we only engage in the practices described in this Privacy Policy in a particular country or region if permitted under the laws of those countries or regions. Please contact your local JTI purchasing team, if you have questions regarding our practices in your country or region.

2. INFORMATION WE COLLECT ABOUT YOU

We collect different kinds of personal information about you, including: (a) information that you give to us; (b) information that we automatically collect from your use of the Platform; and (c) information that we collect from third parties.

(a) Information that you give us

We ask for and collect the following personal information about you when you access and use the Platform:

- **Account information:** when you sign up to use the Platform, we require certain information such as your name, email address, business address, employee/stakeholder type, employer, country of residence, telephone number and date of birth
- **Identity verification information:** to help create and maintain a trusted environment, we may collect identity verification information (such passport, national ID card, as permitted by applicable laws)
- **Payment information:** to use certain features of the Platform, we may require you to provide certain financial information (such as your bank account) in order to facilitate the processing of payments.
- **Information relating to compliance:** you will be asked to provide further information in a questionnaire which will allow us to verify whether you meet the requirements set

by JTI for providing goods and services, as we require our supplier to comply with these **JTI Supplier Standards** and ensure that your own suppliers comply with them.

- **Communications with us:** when you communicate with us, we collect information about your communication with us and any information you choose to provide.

(b) Information that we automatically collect from your use of the Platform

When you use the Platform, we automatically collect the following information, including personal information, about your use of the Platform:

- **Usage information:** we collect information about your interactions with the Platform, the pages you have viewed on the Platform and other actions on the Platform.
- **Log data and device information:** we automatically collect log data and device information when you access and use the Platform. This information includes, among other things, details about how you have used the Platform, Internet Protocol address, access dates and times, hardware and software information, device information, unique identifiers, crash data, cookie data and the pages you have viewed on the Platform.
- **Cookies and automated technologies:** As you use the Platform, we automatically collect information about your device, browsing actions and patterns. We collect this information by using cookies and similar technologies. Please see our cookies policy for further details, www.jti.com/site-services/cookies.

(c) Information that we collect from third parties

We and our service providers supplement the personal information we collect with information obtained from other sources (for example, publicly available information from online social media services and other information resources, third party commercial information sources, and information from our business partners).

3. HOW WE USE YOUR INFORMATION

We will only use your personal information when the law allows us to. The purposes for which we use your personal information may differ based on our relationship with you, including the type of communications between us and the services we provide.

Most commonly, we use your personal information in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- where we need to comply with a legal obligation.

Where we rely on legitimate interest as a basis for processing your personal information, we carry out a 'balancing test' to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests.

Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to

perform or conclude the contract with you (for example, to provide you with access to the Platform or any requested services). In this case, we may have to disable your access to the Platform or cancel those services, but we will notify you if this is the case at the time.

We have set out below in a table format descriptions of the ways we intend to use your personal information and the legal basis we rely on to do so.

Purpose / Activity	Legal basis for processing
To allow to you to access and use the Platform; to provide any requested services; and to manage our relationship with you	<ul style="list-style-type: none"> • Performance of a contract with you (without it, we may not be able to provide you with access to the Platform or the requested services) • Necessary for our legitimate interests (to improve and develop our business operations and service offering, or those of a third party) • Necessary to comply with our legal obligations
To improve the quality and functionalities of the Platform and maintain information security	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to improve and develop our business operations and service offering, or those of a third party) • Necessary to comply with our legal obligations
To manage our business operations and IT infrastructure, in accordance with our internal policies and procedures	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our business, the provision of administration and IT services, network security, to prevent fraud) • Necessary to comply with our legal obligations
To comply with applicable laws and regulatory obligations (including laws and regulations outside your country of residence), for example, laws and regulations relating to public health and tobacco, Anti-money laundering Policy, Global Economic Sanctions Policy, Anti-Bribery and Corruption Policy and other; comply with legal process and court orders; and respond to requests from public and government authorities (including those outside your country of residence)	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to protect our business, shareholders, employees and customers or those of a third party) • Necessary to comply with our legal obligations
To establish and defend legal rights to protect our business operations, and those of our group companies or business partners, and secure our rights, privacy, safety or property, and that of our group	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to protect our business, shareholders, employees and customers or those of a third party)

companies or business partners, you, or other individuals or third parties; to enforce our terms and conditions; and pursue available remedies or limit our damages.	<ul style="list-style-type: none"> • Necessary to comply with our legal obligations
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We need to collect, use and disclose personal information in connection with matters of important public interest, for instance when complying with our obligations under public health and tobacco legislation or anti-money laundering and terrorist financing laws and regulations, and other laws and regulations aimed at preventing financial crime. In these cases, the legal justification for our use of personal information is that the use is necessary for matters of public interest as well as compliance with legal obligations. Additional justifications may also apply depending on the circumstances.

4. DISCLOSURE OF YOUR INFORMATION

All information you provide to us is stored on our secure servers.

We share personal information we collect about you with JTI; our service providers; business partners; suppliers and sub-contractors for the purposes of fulfilling the services they provide to us; and with government and public authorities where we need to comply with legal obligations.

We also share your personal information to third parties in the following circumstances:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets.
- If JTISA or substantially all of its assets are acquired by a third party, in which case personal information held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or to protect the rights, property, or safety of JTISA, our customers, or others.

Due to the global nature of our business, we, from time to time, share your personal information with parties (including with JTI) located outside Switzerland and outside of the European Economic Area. We will take steps to ensure that your information is adequately protected and transferred in accordance with the requirements of applicable data protection laws. This may rely on data transfer agreements in the form approved by the European Commission or another mechanism recognised by data protection law as ensuring an adequate level of protection for personal information transferred outside the EEA (for example, the standard contractual clauses). Where we share your information within JTI, these internal transfers are governed by our intra-group data sharing agreement.

5. DATA SECURITY

Once we have received your information, we will use appropriate procedures and security features to try to prevent unauthorised access, and to prevent your information being accidentally lost. We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your information on our instructions and they are subject to a duty of confidentiality.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to the Platform. We have put in place procedures to deal with any suspected data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will only keep your information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To decide the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your information, the purposes for which we process your information, and whether we can achieve those purposes through other means, and the applicable legal requirements.

7. YOUR LEGAL RIGHTS

Data protection legislation provides you with certain rights when it comes to the processing of your information. If you are based in the EU, you have the following rights with respect to our processing of your personal information:

Rights	What does this mean?
Your right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Privacy Policy.
Your right of access	You have the right to obtain access to your information (if we are processing it), and other certain other information (similar to that provided in this Privacy Policy).
Your right to rectification	You are entitled to have your information corrected if it is inaccurate or incomplete.
Your right to erasure	You can request the deletion or removal of your information where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
Your right to restrict processing	You have the right to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.

Your right to data portability

You have the right to obtain and reuse your personal information for your own purposes across different services..
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Your right to object

You have the right to object to certain types of processing, on grounds relating to your particular situation

If you wish to exercise any of the rights set out above, please contact the JTI purchasing team or, alternatively, use the email address or postal address below. Further information about your rights can be obtained from the data protection regulator in your country.

If you are not satisfied with our response to your request or believe our processing of your information does not comply with data protection law, you have the right to lodge a complaint to the data protection authority in the jurisdiction where you live or work, or in the place where you think an issue in relation to your data has arisen.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that your information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

8. CONTACT US

If you have any questions about this Privacy Policy, or our information handling practices, including any requests to exercise your rights, you can contact us (in English):

- by email at: dataprotection@jti.com
- by post at:
JT International SA
8, rue Kazem Radjavi
1202 Geneva
Switzerland
For the attention of: Legal Department – Data Protection

9. STATUS OF THIS PRIVACY POLICY

This Privacy Policy was last updated on ●. We may review this Privacy Policy and make changes from time to time.

Any changes we make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy Policy.