Recruitment and Candidate Privacy Notice

Who are we?

At BAT we are committed to protecting the privacy of our candidates and users of this eRecruitment Site ("Site"). We will ensure that the information you submit to us 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 General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR"), the data controller and the company responsible for your personal data that you enter into this site initially (e.g. name, email address, background details) is British-American Tobacco (Holdings) Limited whose address is Globe House, 4 Temple Place, London WC2R 2PG. In this Privacy Notice we refer to each data controller as ("BAT", "us" or "we").

At the moment you apply for a specific job on this Site then your personal data will be transferred by the BAT legal entity that is stated in the specification for that job. This 'second' data controller will be responsible for both all your information that you provided prior to your application (i.e. in this Site), and also it will be the sole data controller for all the other information that you provide subsequently in connection with that application. At this point, you will be provided with a further Privacy Notice (if required under local law) with information about how your personal information will be processed by that BAT legal entity you’ve applied to.

This Privacy Notice explains what we do with your personal information in the context of BAT’s recruitment activities using this Site and prior to you making an application to a specific BAT legal entity.

If you apply for a job with the following companies (listed below) this Privacy Notice shall apply to all processing of your personal information within the recruitment application process where indicated (for ease, we have abbreviated to refer to these companies as “Centre Entities”). Remember, if you are unsure which Centre Entity applies to you then please contact us.

British-American Tobacco (Holdings) Limited
Nicoventures Trading Limited
Nicovations Limited
B.A.T. (U.K. Export) Limited
Nicovations Holdings Limited
British American Tobacco (Investments) Limited
BATMark Limited

British American Tobacco Western Europe Commercial Trading Limited
British American Tobacco Global Travel Retail Limited
British American Tobacco AIT Limited
British American Tobacco UK Limited
British American Tobacco (Corby) 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 table below which sets out what personal information we hold about you, the reason why we use it and the law lets us do this.

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<td>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</td>
<td>• 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; and • extra information that you choose to tell us.</td>
<td>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. 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;</td>
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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.

| 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; and |
| To ensure that the Site runs smoothly help us keep our systems secure and prevent unauthorized access or cyber-attacks. |

| 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). |
| You have provided your consent to for us to do this when you register on our Site. |

| • Name; and |
| • your email address/contact details. |

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

**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**

| • 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. |

**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. This Privacy Notice pertains to this Site only. 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.

- 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 BAT entities. As identified in this Privacy Notice, your personal information will be shared with the BAT entity 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 European Economic Area 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 British American Shared Services Europe s.r.l. in Romania. This entity 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); and

• 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.

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; and
- 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. 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 October 25th, 2019.