

Privacy Notice

11th September 2025



At BAT, we collect a variety of information about people we interact with as part of our business and may use it in lots of different ways. We are committed to ensuring that your personal information is protected and never misused.

In this Privacy Notice, BAT , us , we or our means the BAT group company or companies who are responsible for personal information collected about you in the United Kingdom UK .

We have designed this Privacy Notice to help you find the information about our privacy practices quickly and simply. This part of our Privacy Notice explains what control you have over your personal information, who we share it with, and how we keep your personal information safe including where we transfer it out of the European Economic Area EEA or the UK.

For information on which BAT company is primarily responsible for your personal information, what we collect about you, why we collect it, how we use it legally and for how long we keep it for will depend on the context of your relationship with BAT. Please choose from the options below selecting the one s that best fits your connection to BAT. If you are not sure which one applies to you and need help, please contact us using the contact details below.

If you are an online consumer and want to know how your information is being processed, then please contact us and we will direct you to the correct website and privacy notice.

1. What are your rights under data protection law

Subject to certain exceptions, by law you have several rights in relation to how your information is used. If you want to exercise your rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will make sure to respond to you within one month from the later of i the date that we have confirmed your identity, or ii the date we received your request.

Right of access (also known as Subject Access Requests)

You may ask us for a copy of the information we hold about you. If we provide you with a copy, we will not charge you. If you request further copies of this information from us, we may charge you a reasonable administrative cost. We will only refuse your request in very limited circumstances as permitted by law,

and we will always explain to you the reasons why we are not fulfilling your request.

Right to correct the data we hold about you

You have the right to ask us to correct any inaccurate or incomplete personal information that we hold about you. If we have shared this personal information with third parties, we will notify them, unless this is impossible or involves disproportionate effort.

Right to object

You can object to us using your information if we are using it for the purpose of our legitimate interests.

If we agree that your objection is justified, we will permanently stop using your information for those purposes. Otherwise we will explain why we need to continue using your information for example, explaining that we need to use your information in connection with a legal claim .

Right to withdraw consent

Where we have asked your permission to use your personal information for certain activities, you may withdraw your permission at any time by emailing or calling us at the contact details set out below and we will stop using your information for that purpose.

Relevant to the section BAT end market consumers and website visitors

Please note that if you withdraw your consent for a specific type of cookie used by a BAT end market website, this will opt you out from any tracking by those cookies and prevent future data collection through those cookies. If you would like the data collected by those cookies before your consent was withdrawn to be deleted, you will need to submit a data erasure request to the BAT end market company that operates the website in question. Please be aware that it may not always be possible for the relevant BAT end market company to delete your data for example, if the data is not linked to an identifiable individual.

Right to erasure

In certain cases, you have the right to ask us to erase your personal



information. Normally, you can do this where

- **It s no longer necessary for us to use your information**
- **we were relying on your consent to use your information and you have withdrawn your consent**
- **Your information has been used unlawfully**
- **your information needs to be erased in order for us to comply with our obligations under law or**
- **You object to the processing and we don t have a compelling reason to continue using it.**

In these cases, we will take all reasonably practicable steps to erase the relevant data. We will only refuse to comply with your request to erase your information in limited circumstances, and we will always tell you our reason for doing so.

Right to restrict our use of your personal information

You can ask us to suspend our use of your personal information in certain circumstances. For example, during the time it takes us to respond to your request to correct the information we hold about you. If we have shared your information with third parties, we will notify them about the restricted use of your personal information unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on our use of your personal information.

Right to move your data

You have the right to ask us to transfer certain personal information we hold about you to another third party service provider. Alternatively, you may ask us to transfer the information directly to you.

Rights relating to automated decisions

In certain circumstances, you may contest a decision made about you based on automated processing. We do not generally make decisions based solely on automated processing of your personal data, but when we do so, we will let you know.

Right to complain

You have the right to lodge a complaint with your local data protection supervisory authority, which is the Information Commissioner s Office in the UK.



2. Who do we share your information with

At BAT, we do not share, rent or trade your information with third parties for marketing or promotional purposes. When necessary we may share information about you with the following recipients

- **any of our BAT group companies**
- **Tax, audit, or other authorities, when we believe we are legally required to do so, where the relevant authority has asked us to assist for example, because of a request by a tax authority or in connection with any expected litigation , or in order to help prevent fraud or to protect the rights of BAT or protect the personal safety of BAT employees, third party agents or members of the public.**
- **third party service providers such as external consultants and professional advisers including law firms, auditors and accountants , technical support functions, and IT consultants carrying out testing and development work on our business technology systems**
- **third parties for the purposes of background screening checks, credit worthiness checks, order fulfilment, delivery, customer support services and storage services**
- **third party outsourced IT providers, including but not limited to email text messaging providers Cloud IT service providers, business suite solution providers data analytics agencies IT strategic implementation partners hosting service providers**
- **if it is proposed that a BAT Group entity or business is to merge with or be acquired by another business in the future, we may share your personal information with potential purchasers, where this is necessary, or the new owners of the business or company.**

3. Do we transfer your personal information to other countries when we share it

In using information as set out in this Privacy Notice, personal data may be processed on a variety of systems, networks and facilities worldwide.

Sometimes your personal information may be transferred to countries outside of the EEA or the UK.

In such cases, we will take reasonable steps to ensure that your personal information is treated securely and the means of transfer provide adequate safeguards, for example using Standard Contractual Clauses as approved by the European Commission and or the UK.



4. How do we use your personal information and how do we legally do this

We need to process your personal information for a variety of reasons or purposes . These purposes for which we use your information are summarized below. In addition, when we process or use your personal information we need a legal basis to do this. The general legal bases that allow us to use your information are set out below. To find out which specific legal grounds we rely on for the processing of your personal information in the context of each particular purpose, please choose from the options in this Privacy Notice selecting the one s that best fits your connection to BAT. If you need any assistance, please contact us using the contact details below.

- **Performance of a contract**
- **We need to process your personal information to perform a contract with you or take steps at your request prior to entering into a contract.**
- **Legal obligation**
- **We have a legal obligation to ensure that we comply with all statutory and regulatory requirements within the jurisdictions within which we operate including those relating to bribery and corruption, money laundering and sanctions when engaging with third parties. These obligations may require us to collect, store and sometimes share your personal information with other organizations such as the police, tax authorities or other public authorities or governmental enforcement agencies including those outside the UK .**
- **Legitimate interests**
We have a legitimate interest in using your information in the following ways
 - **Risk analysis and management**
 - **Prevention and detection of criminal activity**
 - **Credit worthiness checks**
 - **Corporate restructuring**
 - **Activities related to information security and building security, including the use of CCTV e.g. if you visit our premises**
 - **Client customer and vendor relationship management and business to business communication**
 - **Internal and external audits**
 - **Group communications**
 - **Establishing and defending legal claims.**

The law allows our use of your personal information for these interests only insofar as such interests are not outweighed by a greater need to protect your privacy.



- **Consent**

We may ask your permission to use your personal information in certain circumstances. Where you give your permission, you are entitled to withdraw it at any time and we shall make this clear at the time of collection.

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

We care about protecting your information. That s why we put in place appropriate measures that are designed to prevent unauthorized access to, and misuse of, your personal information. We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorized access. We do this by having in place a range of appropriate technical and organizational measures, including encryption measures and disaster recovery plans.

If you suspect any misuse or loss of or unauthorized access to your personal information, please let us know immediately by contacting us using the details provided at the end of this notice.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will apply our normal procedures and comply with legal requirements to protect your information, we cannot guarantee the security of your information transmitted from you to us.

6. Contact us

To exercise any of your rights or if you have any questions or complaints about this Privacy Notice please email by writing to Data Privacy bat.com .

7. Updates to this Privacy Notice

We may amend this Privacy Notice from time to time, so please ensure to check back regularly.

Last Modified 11 September 2025.



Relationship with BAT

- **A BAT staff member**
- **A visitor to this website**
- **Business relationships with BAT**
- **A candidate or job applicant**
- **Emergency contacts or those named to receive benefits by a BAT employee**
- **BAT end market consumers and website visitors**
- **Other individuals who interact with BAT**
- **Other individuals who publish content on BAT products or similar categories of products**

A BAT staff member

If you are a current or former employee, contractor or another staff member of BAT such as a trainee or secondee then please note that this Privacy Notice does not apply to you. Please [click here](#) to access the BAT Employee Privacy Notice or contact [Data Privacy bat.com](mailto:Data_Privacy_bat.com) for more information.

A visitor to this website

This section of the Privacy Notice applies to visitors of the BAT.com website and those individuals who are interested in BAT s updates, events or make an enquiry via this website. Here we tell you which BAT company is primarily responsible for your personal information, what we collect, why we collect it, how legally we can use it and for how long.

Which BAT company is primarily responsible for your personal information

The company responsible for your personal information collected on this site is British American Tobacco p.l.c. with its registered offices at Globe House, 4 Temple Place, London WC2R 2PG, United Kingdom.

What personal data do we hold about you and where does it come from

We don't make any routine use of your personal information. Non-personally identifiable information is captured in statistical form, i.e. Google Analytics statistics about the online footfall to our site. Unless you fill in a form on our website, we can't identify you.

We only collect and hold the personal information you provide to us when you visit our website, such as through filling out a contact form, or if you sign up to receive communications regarding BAT updates or news on events.

How do we use your personal data, how do we legally do this and how long do we keep it for

For a general description of all the ways we use your personal information please click back to section 4 of this Privacy Notice. However, in respect of the way we use your personal information in the context of the relationship that you have with us in visiting the BAT.com website, please see below

Why do we hold your information	What type of information	How legally can we use your information	How long do we keep it for
To respond to any query that you have asked us.	Name and contact information Any information that you provide to us in submitting your query through our contact form.	It is in our legitimate interests to respond to your query and in order to ensure that you have the most up to date information about the BAT business and that any concerns you have relating to BAT are	1 year after the point in which it is no longer necessary for the purposes for which we obtained it.

Why do we hold your information	What type of information	How legally can we use your information	How long do we keep it for
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resolved.
However, we will always balance our legitimate interests against your rights and freedoms before using your data. We will take into consideration the factors listed [here](#).

Where you request us to do so, to communicate our events and updates to you	Name and contact information	We rely on your consent to communicate with you for these purposes.	We will keep this information for as long as you would like to receive information about our events. We will delete this information if you unsubscribe or withdraw your consent.
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We may need to keep your information longer than the periods stated above. This could be because of the following reasons

- to potentially establish, bring or defend legal proceedings or to comply with a legal or regulatory requirement
- to be able to deal with external or internal audits.



When it is no longer necessary for us to keep your information, we will delete it from our systems. Afterwards, we only retain aggregated data from which you cannot be identified for analytical purposes.

Business relationships with BAT

Privacy for our business contacts

This section of the Privacy Notice applies to you if you or your employer is a Third Party and supplying goods or services to BAT or proposing to do so , or purchasing goods or services from us or proposing to do so . It also applies if you are a director or direct or indirect shareholder of a Third Party organisation supplying or receiving goods or services to or from BAT or where such Third Party organisation is proposing to do so .

In this section Third Party means the following

- **Supplier Vendor - A person or organisation that provides goods or services to the BAT Group or any Group company and receives consideration for these goods or services.**
- **Customers - Any person or entity other than a BAT operating company or a direct store distribution customer of a BAT operating company which directly purchases tobacco leaf and or products from a BAT operating company.**
- **Trade Associations - A group organised and funded by business society participants that share common goals. Examples include The Digital Coding Tracking Association, Tobacco Manufacturers Associations, Associations of Accountants and Lawyers.**
- **Landlords - The owner of land or buildings used by BAT**

Here we tell you which BAT company is primarily responsible for your personal information, what we collect, why we collect it, how legally we can use it and for how long we keep it.



Which BAT company is primarily responsible for your personal information

The BAT company listed below which has a business relationship with you, your employer, or the company of which you are a shareholder or director, will be primarily responsible for your personal information. For further information please contact [Data Privacy](#) bat.com .

What personal data do we hold about you and where does it come from

At BAT, we need some information about you, such as your name, job title and contact details so we can work with you to manage the contract and relationship for the goods or services you supply to us, or we supply to you. We may collect your personal data via a Third-Party risk assessment tool to complete due diligence and risk management processes necessary for Third Party onboarding. As part of managing the business relationship, we may be legally required to conduct know your customer e.g. via World Check One or similar compliance screenings on you or your company. In doing so we will use the information listed below. We obtain this information either obtain directly from you or from your employer, or the company you are shareholder or director of. In the context of conducting compliance screenings, we will also check the personal information provided to us against public information, including official sources such as sanctions lists , media sources and adverse media such as news reports, journal articles, , and additional Government and official sources such as court records, election results, company filings, official company websites and press releases .

How do we use your personal data, how do we legally do this and how long do we keep it for

For a general description of all the ways we use your personal information please click back to section 4 of the Privacy Notice. However, in respect of the way we lawfully can use your personal information in the context of the relationship that you have with us, please see below.



Why do we hold your information	What type of information	How legally can we use your information	How long do we keep it for
To manage the contract and business relationship with either you, your employer or the company you are a director or direct or indirect shareholder or representative.	Name, contact information e.g. email address, telephone number	In order to perform our obligations under contract or take steps prior to entering into a contract.	7 years after the expiry of the business relationship or contract entered into by BAT.
To conduct due diligence and risk management processes necessary for Third Party onboarding and during the relationship engagement including risks related to bribery and corruption, money laundering, sanctions, tax evasion and illicit trade .	- Primarily ordinary category data, e.g. names, email address, phone number, date of birth, country of residence, trading address, tax identification number, share ownership. - In certain circumstances for example, Sanctions Screening , BAT will also seek to collect	To comply with a legal obligation to which BAT is subject. For those not directly associated to a legal obligation, that such processing is necessary for the performance of a task carried out in the public interest, and that such processing is in its and its Third Parties in its legitimate interests. The legitimate interest is to ensure	7 years following cessation of the relationship with that Third Party.

Why do we hold your information	What type of information	How legally can we use your information	How long do we keep it for
	special category data e.g. nationality data . BAT will only collect and process special category data where necessary as part of the specific screening required. In the exceptionally rare event of a hit, BAT may potentially collect special categories of data and criminal records.	appropriate levels of due diligence so that it does not breach the laws and regulations that apply to it, including international sanctions laws and screening lists. For special categories of personal data or criminal records, the processing is necessary for reasons of substantial public interest, in particular for the prevention and detection of unlawful acts, and for regulatory requirements relating to unlawful acts and dishonesty.	

Please note that we may need to keep your information longer than the periods stated above. This could be because of the following reasons



- to potentially establish, bring or defend legal proceedings or to comply with a legal or regulatory requirement
- to be able to deal with external or internal audits.

When it is no longer necessary to retain your data, we will delete the personal information that we hold about you from our systems. After that time, we would only retain aggregate data from which you cannot be identified for analytical purposes.

BAT entities primarily responsible for your personal information

- BAT Services Limited
- BATLaw Limited
- BATMark Limited
- British American Tobacco AIT Limited
- British American Tobacco GLP Limited
- British American Tobacco Investments Limited
- British American Tobacco Exports Limited
- British American Tobacco p.l.c.
- British-American Tobacco Holdings Limited
- British American Tobacco UK Limited
- Nicoventures Retail UK Limited
- Nicoventures Trading Limited
- British American Tobacco Corby Limited
- Nicovations Limited

A candidate or job applicant

Privacy for our candidates or people applying to work for us.

Please see the Privacy Notice available [here](#) if you have registered with us on our BAT Career site if you have sent us your CV or resume, or you are currently in a recruitment process with one of our companies.



Privacy for our employees relatives or emergency contacts

This section of the Privacy Notice applies to you if one of our employees employed by a BAT legal entity established in the United Kingdom has named you as the person we should contact in an emergency or to administer any employee-based benefits. If the relevant employee is employed at a BAT entity outside of the United Kingdom, then a local Privacy Notice applies. Please contact the local office for more information or send an email to data_privacy@bat.com.

Here we tell you which BAT company is primarily responsible for your personal information, what we collect, why we collect it, how legally we can use it and for how long.

Which BAT company is primarily responsible for your personal information

The BAT company primarily responsible for your personal information is British-American Tobacco Holdings Limited whose address is Globe House, 4 Temple Place, London WC2R 2PG or if the person nominating you is an employee at British American Tobacco UKI Limited BAT UKI then BAT UKI is primarily responsible for your personal information.

What personal data do we hold about you and where does it come from

We only hold information about you as detailed in the table below which has been provided to us by a BAT employee to enable us to contact you in emergencies or to administer employee benefits such as healthcare or international assignment relocation packages.



How do we use your personal data, how do we legally do this and how long do we keep it for

We only use your personal information in the ways detailed in the table below, which also sets out the legal bases we rely on to contact you or use your information in any other way.

Why do we hold your information	What type of information	How legally can we use your information	How long do we keep it for
To contact you in emergencies relating to the BAT employee s that have named you as their emergency contact person	• Name and contact information.	It is in our legitimate interests to be able to contact you for the benefit of our employee in an emergency.	1 year after the relevant employee remains an employee by BAT.
To administer employee benefits that our employee has asked us to take steps to fulfil	• Name and contact information and • Data of birth.	This is necessary for us to take steps to perform the benefits contract between the BAT employee and the benefits provider.	6 years following the duration of the contract through which you are entitled to receive the relevant employee benefits.
To administer employee pension benefits that our employee has asked us to take steps to fulfil	• Name and contact information • Data of birth and • National insurance number	This is necessary for us to take steps to perform to comply with our legal obligations in particular under UK tax laws between the BAT employee and the benefits provider.	20 years following the duration of the pension lifetime through which you are entitled

Why do we hold your information	What type of information	How legally can we use your information	How long do we keep it for
			to receive the relevant employee benefits.

Please note that we may need to keep your information longer than the periods stated above because of the following reasons

- to potentially establish, bring or defend legal proceedings or to comply with a legal or regulatory requirement or
- to preserve records beyond the above periods to be able to deal with external or internal audits.

When it is no longer necessary to retain your data, we will delete the personal information that we hold about you from our systems. After that time, we would only retain aggregate data from which you cannot be identified for analytical purposes.

BAT end market consumers and website visitors

This section of the Privacy Notice applies to you if

- You are interacting with a BAT website or service that is directed at individuals in a country where the relevant BAT company BAT end market company shares your data with Nicoventures Trading Limited we or us for the purposes described below and
- You fall within any of the following categories
 - Visitors to BAT end market eCommerce or brochureware websites
 - Consumers with accounts on BAT end market eCommerce websites
 - Consumers whose personal data is collected through a BAT end market company s customer relationship management CRM system, including personal data that may be collected from you offline e.g. during your calls with such company s customers services teams



To help you identify which specific BAT end market companies this section covers, please note that it will apply to any BAT end market company whose own privacy notice refers to this section.

Here, we tell you which BAT company is primarily responsible for your personal data, what we collect, why we collect it, the legal reason we can use it, and for how long we keep it.

Which BAT company is primarily responsible for your personal data

The company that is primarily responsible for your personal data is the local BAT end market company that manages either

- **the BAT end market website you have visited or the BAT end market CRM system which holds information about you or**
- **the BAT end market eCommerce website on which you created an account.**

We receive consumer data from certain BAT end market companies into BAT's global data platform, which enables us to create insights reports at a global level. In this context, we will have access to aggregated consumer data for our own insights and reporting purposes and will be a separate data controller, which is a legal term that means we independently decide how and why we use that data.

This privacy notice does not apply when consumer data collected by a BAT end market company is received by a BAT company acting as a data processor within BAT's global data platform for that BAT end market company's purposes. In those cases, the data is handled on behalf of the relevant BAT end market company that collected the data, which remains the data controller. This means that the BAT company processing the data follows the BAT end market company's instructions and does not use the data for its own purposes.

For further information, please contact Data Privacy bat.com.

What personal data do we hold about you and where does it come from

We process various types of personal data about you in BAT's global data platform, and such information is collected from various BAT end market company source systems, namely BAT end market eCommerce and brochureware websites and BAT end market CRM systems.

Below is a list of categories of personal data we hold about you

- **BAT end market CRM systems information contained in your BAT end market CRM systems account, such as your contact details e.g., name,**



**email, country , account details e.g., account number, account status
campaign information e.g., campaign name, target audience , marketing
communication preferences engagement data e.g. number of clicks**

- **BAT end market eCommerce websites information contained in your BAT end market eCommerce website account, such as transaction details e.g., order number, total amount , your contact details e.g., name, email, country, postcode , details of purchased product e.g., SKU, product category, product brand , subscription details e.g., brand, tier, status , shipping details e.g., shipping cost , promotion details e.g., discount**
- **BAT end market eCommerce and brochureware websites analytics on those BAT websites information gathered when you visit a BAT end market company s website, including information collected through contact forms or sign-ups for communications, such as visitor activity tracking e.g., user device, device browser browser used, viewport size of user s browser, version of browser used , client ID number, full visitor ID number, user ID number, visit number, visit ID session identifier , visit start time timestamp , session date number, unique visitors, bounce rate , traffic source source e.g., Google , medium e.g., organic, referral , site engagement data e.g. time on site on screen, pages per session, total number of ecommerce transactions within the session , social engagement type**

Although the information described above is received by us in BAT s global data platform in an identifiable format, it is only visible to us in an aggregated, non-identifiable format.

How do we use your personal data, and how long do we keep it for

For a general description of all the ways we use your personal data, please visit section 4 of this Privacy Notice. Please see the table below for details of how we use your personal data if you are a BAT end market consumer or a BAT end market website visitor.



Why do we hold your information	What type of information	How legally can we use your information	How long do we keep it for
To produce global insights reports for our own insights and reporting purposes	The information outlined in the above section <i>What personal data do we hold about you and where does it come from?</i> obtained from BAT end market CRM systems, BAT end market eCommerce websites and BAT end market websites	Where applicable in accordance with local laws, cookie data is collected and used based on your consent	The retention period for this data follows the retention period set out by the applicable BAT end market company which has initially collected your personal data. We will delete this information if you withdraw your consent and submit an erasure request please refer to the Right to withdraw consent section of this Privacy Notice
		In relation to personal data we receive other than from cookies and similar technologies, it is in our legitimate commercial interest to use your personal data in order to better inform strategic decisions and	The retention period for this data follows the retention period set out by the applicable BAT end market company which has initially collected your personal data.

Why do we hold your information	What type of information	How legally can we use your information	How long do we keep it for
		initiatives within our corporate group	

We may need to keep your information longer than the periods stated above. This could be because of the following reasons

- **To establish, bring, or defend legal proceedings or to comply with a legal or regulatory requirement.**
- **To be able to deal with external or internal audits.**

Other individuals who interact with BAT

This section of the Privacy Notice applies to you if you fall within any of the following categories

- **journalists with whom we communicate in any medium**
- **visitors to our physical premises**
- **individuals who attend or participate in conferences or events in which we are involved**
- **individuals who represent regulatory and law enforcement agencies or other governmental offices**
- **individuals who voluntarily participate in any of our panels and**
- **academics and research professionals.**

Here we tell you which BAT company is primarily responsible for your personal information, what we collect, why we collect it, how legally we can use it and for how long we keep it.



If you engage in business with BAT by acting as a supplier or vendor, customer, trade association or landlord please see section **Business relationship with BAT** [here](#).

Which BAT company is primarily responsible for your personal information

The BAT company listed below with which you interact will be primarily responsible for your personal information. For further information please contact [Data Privacy](#) [bat.com](#).

What personal data do we hold about you and where does it come from

At BAT, we need some information about you, and will collect and hold the information listed in the table below under **What Type of Information** so we can manage any current or future relationship we may have with you. We obtain this information either directly from you or from your employer, or from third parties who lawfully provide it to us including publicly available materials including the organisers of public events you attend.

How do we use your personal data, how do we legally do this and how long do we keep it for

For a general description of all the ways we use your personal information please click back to section 4 of the Privacy Notice. However, in respect of the way we lawfully can use your personal information in the context of the relationship that you have with us, please see below.

Why do we hold your information	What type of information	How legally can we use your information	How long do we keep it for
To contact you in order to manage your	Name, contact information e.g. email address, telephone	In order to 1 perform our obligations under contract in particular a for	7 years after the expiry of the business relationship or contract

Why do we hold your information	What type of information	How legally can we use your information	How long do we keep it for
relationship with us.	number, region where you are from	those individuals who attend, or participate in, conferences or events or b in the context of our relationships with journalists or take steps prior to entering into a contract or 2 exercise our legitimate interests in being able to contact you in the context of a current or future business or commercial relationship.	entered into by BAT.
To perform relevant due diligence into publicly available materials relating to you.	- Name, contact information including the region where you are from - Professional details including your work history, academic history and qualifications, job title, organization, website details if any ,	We will either 1 rely on our legitimate interest in a protecting our business or b in the context of a current or future business or commercial relationship or 2 seek your consent where appropriate.	7 years after the expiry of the business relationship or contract entered into by BAT



Why do we hold your information	What type of information	How legally can we use your information	How long do we keep it for
	contact details, and area of expertise or speciality Any publications, articles or publicly available materials you have created		
To respond to any query that you have asked us.	- Name and contact information - Any information that you provide to us in submitting your query through our contact form or to us directly	It is in our legitimate interests to respond to your query and in order to ensure that you have the most up to date information about the BAT business and that any concerns you have relating to BAT are resolved.	1 year after the point in which it is no longer necessary for the purposes for which we obtained it.
To facilitate safe visits to our premises, and to contribute to COVID-19 containment measures.	Name, contact information and potentially questions surrounding your recent whereabouts or contact with those who may have been infected with the COVID-19	It is in our legitimate interests to facilitate your visit to our premises. This includes recording your access to our premises, taking steps to help ensure your safety	1 year after the point in which it is no longer necessary for the purposes for which we obtained it. Information obtained to contribute to



Why do we hold your information	What type of information	How legally can we use your information	How long do we keep it for
	virus and body temperature information Any information that you provide to us relating to your visit.	on site, and recording any feedback you provide. Furthermore, maintaining safe premises and a safe working environment is within our legitimate interests, and is necessary to protect your vital interests and those of others and to comply with our legal obligations.	COVID-19 containment measures will be retained for no longer than the conclusion of the situation pertaining to the COVID-19 outbreak.
Building a professional relationship with you in relation to your attendance at conferences and events that are of mutual interest.	- Name and contact information - Records of conferences and events attended	It is in our legitimate interests to process your personal data for the purposes of building our professional relationship with you.	1 year after the point in which it is no longer necessary for the purposes for which we obtained it

Why do we hold your information	What type of information	How legally can we use your information	How long do we keep it for
Building current or future professional relationship with you in the context of your work as an academic or research professional.	• Name and contact information • Professional details including your academic history and qualifications, job title, organization, website details if any , contact details, and area of speciality	It is in our legitimate interests to process your personal data for the purposes of developing a current or future professional relationship with you.	7 years after the expiry of the business relationship or contract entered into by BAT.

To facilitate the panel that you are participating in and to understand areas of development of our products or services.

- **Name and contact information**
- **Details about your experience or preferences of the product or service you are testing.**
- **Any reimbursement paid or provided to you.**

We use this information based on your consent which you can withdraw at any time.

We retain details collected during the panel for the period of 35 years.

We retain finance details of any reimbursement paid or provided to you for the period of 20 years.

If we rely on our legitimate interests as detailed above in How legally can we use your information , we will always balance our legitimate interests against



your rights and freedoms before using your information and will take into consideration the factors listed [here](#) .

Please note that we may need to keep your information longer than the periods stated above. This could be because of the following reasons

- to potentially establish, bring or defend legal proceedings or to comply with a legal or regulatory requirement
- to be able to deal with external or internal audits.

When it is no longer necessary to retain your data, we will delete the personal information that we hold about you from our systems. After that time, we would only retain aggregate data from which you cannot be identified for analytical purposes.

BAT entities primarily responsible for your personal information

- BAT Services Limited
- BATLaw Limited
- BATMark Limited
- British American Tobacco AIT Limited
- British American Tobacco GLP Limited
- British American Tobacco Investments Limited
- British American Tobacco Exports Limited
- British American Tobacco p.l.c.
- British-American Tobacco Holdings Limited
- British American Tobacco UK Limited
- Nicoventures Retail UK Limited
- Nicoventures Trading Limited
- British American Tobacco Corby Limited
- Nicovations Limited

Other individuals who publish publicly available content on the web on BAT products or similar categories of products

This section of the Privacy Notice applies to you if you fall within any of the following categories



- users who publish content on BAT products or similar categories of products on publicly available social media profiles and
- users who publish content on BAT products or similar categories of products on other publicly available websites

Here we tell you which BAT company is primarily responsible for your personal information, what we collect, why we collect it, how legally we can use it and for how long we keep it.

Which BAT company is primarily responsible for your personal information

The BAT company primarily responsible for your personal information is Nicoventures Trading Limited whose address is Globe House, 1 Water Street, London WC2R 3LA.

What personal data do we hold about you and where does it come from

At BAT, we collect and hold the information listed in the table below under What Type of Information . We obtain this information from third parties who lawfully provide it to us including publicly available materials .

How do we use your personal data, how do we legally do this and how long do we keep it for

For a general description of all the ways we use your personal information please click back to section 4 of the Privacy Notice. However, in respect of the way we lawfully can use your personal information in the context of the relationship that you have with us, please see below.

Why do we hold your information	What type of information	How legally can we use your information	How long do we keep it for
To conduct analysis and insights to	• Social media handle e.g. your social	In order to exercise our legitimate	Maximum 30 days in an identifiable

Why do we hold your information	What type of information	How legally can we use your information	How long do we keep it for
inform our marketing strategies for this purpose, we temporarily hold your information in an identifiable format and subsequently delete any direct identifiers which relate this information to you	media account name , post-related information the content, time and date of your post, as well as associated likes, number of comments and reshares of such post, and number of followers of the post , account bio information that you have made available such as your age and location , as well as number of followers associated to the publicly accessible account from which you publish your post.	interests in being able to conduct analysis and insights to inform our marketing strategies.	format , after which the information is held in a deidentified format.
To ensure that any analysis and insight conducted to inform our marketing	Voluntary age declaration in your publicly available account bio information	In order to exercise our legitimate interests in being able to ensure that any	Maximum 30 days in an identifiable format , after which the information is

Why do we hold your information	What type of information	How legally can we use your information	How long do we keep it for
strategies does not inadvertently result in the processing of personal data of adults under a certain age.	any publicly available profile picture social media handle	analysis and insight conducted to inform our marketing strategies does not inadvertently result in the processing of personal data of adults under a certain age.	held in a deidentified format. Profile pictures are processed using non-storage operations, meaning no data is kept from the analysis.

If we rely on our legitimate interests as detailed above in how legally can we use your information, we will always balance our legitimate interests against your rights and freedoms before using your information.

When it is no longer necessary to retain your data, we will delete the information that we hold about you and that enables us to identify you in a personally identifiable format from our systems. After that time, we would only retain data from which you cannot be identified for analytical purposes.

