

PERSONAL DATA PROCESSING POLICY AND INFORMATION ON THE REQUIREMENTS BEING IMPLEMENTED TO PROTECT PERSONAL DATA

This document defines the Policy of the Joint Stock Company “International Tobacco Marketing Services” (hereinafter referred to as “ITMS”) (hereinafter referred to as personal data processing policy and information on the requirements being implemented to protect personal data of the Applicants for the vacant positions at JSC “ITMS” and other companies of the British American Tobacco (BAT) Group in accordance with the requirements of Article 18.1 of Federal Law No. 152-FZ of July 27, 2006 “On Personal Data”.

This personal data processing policy and information on the requirements being implemented to protect personal data (hereinafter referred to as the “Policy”) shall apply to any information posted on the website at: <http://batcareers.vcv.ru/batcareers/> (hereinafter referred to as the “Website”), which JSC “ITMS” can receive about the User (Applicant) during the Website, its services, programs and products use.

Use of the Website services means the User's full and unconditional consent to this Policy and the terms of processing of their personal data specified therein; in case of disagreement with these conditions, the User should refrain from using the services offered by the Website.

1. GENERAL PROVISIONS

1.1. JSC “ITMS” shall realize and consider that the privacy of its consumers is one of the highest values, as well as the need to ensure the confidentiality and security of information received from them, including but not limited to their personal data.

1.2. This Policy defines the main directions and principles of JSC “ITMS” activities for processing based on the information received from the products consumers.

1.3. JSC “ITMS” is the operator of the received personal data.

1.4. To comply with the purpose hereof, the abbreviations and terms used therein are as follows, unless otherwise expressly stated or implied by the meaning of the relevant article hereof:

Company – Joint Stock Company “International Tobacco Marketing Services” (JSC “ITMS”), located at: 121614, Moscow, 17, Krylatskaya St, building 2. Phone: 8 (495) 974-05-55.

Personal data processing means any action (operation) or a set of actions (operations) with personal data, carried out with the use of automation or without using such tools, including collection, recording, systematization, accumulation, storage, clarification (removal, modification), extraction, use, transfer (provision, distribution, access), depersonalization, blocking, deletion, destruction of personal data.

The personal data subject is an individual to whom the processed information (personal data) relates directly or indirectly.

For the purposes of this Policy, personal data (PD) is understood as any information provided through the Website by the Applicant relating to a directly or indirectly defined, or identifiable individual (personal data subject).

The Applicant (user) is a visitor to the Website who has been registered on the Website in order to search for work, or using the Website to find work, but without registering on the Website.

CV means a document containing the Personal Data of the Applicant, including information about the name and surname, e-mail address, telephone number, education, work experience, and other data relevant to the job search provided by the Applicant.

2. PURPOSE OF USER PERSONAL DATA PROCESSING

2.1. The Website shall collect and store only those personal data that are necessary to provide services to the User.

2.2. The Website processes Personal Data of the User for the following purposes:

2.2.1. Applicant identification;

2.2.2. Preliminary interview and/or video interview;

2.2.3. Sending notifications, requests and information regarding the use of Website services, contacting by others means for the execution hereof, processing requests from the Applicant;

2.2.4. Improvement in the quality of the Website services, ease of use, development of new Website services;

2.2.5. Sending of any information messages to the provided e-mail address and/or telephone number;

2.2.6. Conducting statistical and other survey;

2.2.7. Confirming the reliability and completeness of the personal data provided by the Applicant.

2.2.8. Sending notice to the Website User about updating the materials on the Website.

2.2.9. Providing the User with effective client and technical support in case of problems related to the Website use.

3. PRINCIPLES OF CONFIDENTIAL DATA PROCESSING

3.1. JSC "ITMS" processes personal data on the Website in accordance with the following principles:

Admissibility. Any PD must be processed legally, and also based on good faith, fairness and reasonableness.

Purposefulness (functionality). PD must be received only to achieve the specific, pre-defined and legitimate objectives referred to in paragraph 2.2 of the Policy. It is not allowed to process PD for purposes that are not compatible with the previously defined and contradicting purposes.

Sufficiency (compliance). The content and volume of processed PD must comply with the stated processing objectives. It is not allowed to process PD that is redundant in relation to the stated processing objectives. PD storage after meeting the objective of their processing and/or loss of the need to meet previously stated objectives is unacceptable.

Reliability. When processing the PD, accuracy must be ensured, as well as their relevance to the established processing objectives.

Determinability. PD must be stored in a form that allows determining the subject of personal data.

Responsibility. When processing the PD, the rights of the Personal Data Subject must be respected, including the right to receive information related to the processing of their PD, in the scope provided for by the current legislation.

Safety. When processing the PD, the necessary legal, organizational and technical measures should be taken to protect the PD from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution of PD, as well as from other illegal actions against PD.

3.2. When collecting personal data using the Website, the Company shall ensure recording, systematization, accumulation, storage, clarification (update, modification), extraction of personal data using databases located on the territory of the Russian Federation.

3.3. Transboundary transfer of PD in the territory of foreign states that do not ensure adequate protection of the rights of the Personal Data Subjects shall not be allowed, except for cases provided for by the current legislation.

3.4. In the event of PD modification or destruction as a result of unauthorized access, the Company shall ensure the possibility of their recovery.

3.5. The Company shall have the right to entrust PD processing for the purposes provided for in paragraph 2.2 of the Policy with a third party that has assumed the obligation to comply with the principles and conditions for PD processing as established by this Policy and current legislation.

3.6. All of the above principles are the Company's priorities in determining the procedure for processing the PD and the organization of the Website operation.

3.7. Personal Data Subject (the User) shall have the right to:

3.7.1. By sending a relevant request to the Company, withdraw their consent to processing the PD and/or receive information concerning the PD processing.

3.7.2. Require the Company to update the PD, block or destroy the PD in the event that they are incomplete, obsolete, inaccurate, illegally obtained or are not necessary for the stated processing purposes.

3.7.3. Protect their rights and legitimate interests, including the right to compensation for damages and/or compensation for emotional damage in the courts.

3.7.4. Personal Data Subject has other rights stipulated by the current legislation.

3.8. The Website administration is obliged to:

3.8.1. Use the information received solely for the purposes specified in this Policy.

3.8.2. Ensure that the User's personal data is kept secret, and also shall not sell, exchange, publish or distribute in other possible ways the User's personal data transmitted, except for cases stipulated by the legislation of the Russian Federation and this Policy.

3.8.3. Take the necessary and sufficient measures to protect the User's personal data from unlawful actions with them in accordance with the requirements established by the legislation of the Russian Federation.

3.8.4. Block the personal data related to the relevant User after receiving request from the User or their legal representative or authorized body for the protection of the rights of subjects of personal data during the verification period in case of illegally processed and inaccurate personal data.

4. ORGANIZATION OF WORKS AND REQUIREMENTS FOR PROTECTING PERSONAL DATA

4.1. For the purposes of exercising proper control over the PD processing, as well as to ensure the PD safety and confidentiality, the Company shall take the necessary organizational and technical measures, including, but not limited to: protecting the PD from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution of PD, as well as from other illegal actions in relation to PD; appointment of persons responsible for the personal data processing and storage; detection of unauthorized access to personal data and taking measures to restore personal data, modified or destroyed due to unauthorized access; setting rules for access to personal data processed in the personal data information system, ensuring registration and recording of any actions performed in the information system with personal data; conducting investigations and drawing up conclusions on the facts of non-observance with the conditions for the storage of personal data media, use of information protection means to prevent actions that may result in violation of the personal data confidentiality or other violations that result in a decrease in the level of personal data protection, development and adoption of measures to prevent possible dangerous consequences of such violations; implementation of internal control and audit of the organization of processing and ensuring the security of personal data.

4.2. The User's personal data shall be processed until the processing objectives specified in the Policy are met in the event that the need to meet these objectives is lost and/or when the Users withdraws their consent to the processing of personal data by any lawful method, including personal data information systems using automation tools or without using such tools.

4.2.1. In the event of denial of employment, the information provided by the Applicant shall be destroyed within 30 days of the date of such decision, unless the Applicant has expressed a desire to continue processing them to select a place of work in the future with the consent of the Company for the personal data processing.

4.3. When disclosing personal data, the Website Administration shall inform the User about such an event using available method.

4.4. The Website Administration in cooperation with the User shall take any necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of the User's personal data.

5. CONDITIONS FOR PROCESSING USERS' PERSONAL DATA AND ITS TRANSFER TO THE THIRD PARTIES

5.1. In respect of the User's personal data, its confidentiality shall be protected, except for cases of voluntary provision by the User of information about themselves for general access to an unlimited number of persons.

5.2. The Website shall have the right to transfer the User's personal data to the third parties in the following cases:

5.2.1. The User has consented to such actions.

5.2.2. The transfer is necessary for the User to use the specified service or for the execution of a certain agreement or contract with the User.

5.2.3. The transfer is provided for by the Russian or other applicable legislation within the framework of the procedure established by law.

6. LIABILITY OF THE PARTIES

6.1. The Website Administration that has defaulted on its obligations shall be liable for losses incurred by the User in connection with the misuse of personal data in accordance with the legislation of the Russian Federation.

6.2. In case of loss or disclosure of confidential information, the Website Administration shall not be liable if this confidential information:

6.2.1. Had become publicly available before its loss or disclosure by the Website Administration.

6.2.2. Had been received from a third party before it was received by the Website Administration from the User.

6.2.3. Was distributed with the consent of the User.

6.3. Persons guilty of violating the rules governing the receipt, processing and protection of PD can be brought to financial, disciplinary, administrative, civil or criminal liability in the manner established by the legislation of the Russian Federation.

7. SETTLEMENT OF DISPUTES

7.1. Before applying to the court with a claim for disputes arising from the relationship between the Website User and the Website Administration, it is mandatory to file a claim (a written proposal for the voluntary settlement of the dispute).

7.2. The claim receiving party shall notify the applicant in writing within 14 (fourteen) calendar days of the date of receiving the claim in writing of the results of the claim review.

7.3. If the agreement is not reached, the dispute will be referred to the court in accordance with the current legislation of the Russian Federation.

7.4. The current legislation of the Russian Federation shall apply to this Policy and the relationship between the User and the Website Administration.

8. ADDITIONAL TERMS

8.1. The Website Administration shall have the right to make changes to this Policy without the consent of the User.

8.2. The new Policy shall enter into force from the moment of its posting on the Website, unless otherwise provided by the new edition of the Policy.

8.3. Any proposals or questions on this Policy should be sent by e-mail to info@batrussia.ru.

8.4. The current Policy is posted on the page at: <http://batcareers.vcv.ru/batcareers/>.