

Privacy Notice
Battle of Minds 2024
BAT Hungary

1. GENERAL INFORMATION

BAT Pécsi Dohánygyár Kft. (seat: 1117 Budapest, Alíz utca 3. 6. em.¹) (hereinafter referred to as „**BAT Hungary**”, „**the Company**” or „**Data controller**”) organizes the Country Selection level (hereinafter referred as: “**Country Level Competition**”) of the BAT „Battle of Minds 2024” competition (hereinafter referred as: “**Competition**”). In the Country Level Competition BAT Hungary provides the opportunity for the Team Entrants to Local Consultation and Pitch Preparation. In order to organize the Country Level Competition, the Local Consultation and the Pitch Preparation, BAT Hungary processes the relevant data of the members of the Team Entrants (hereinafter referred to as: “**Data subjects**”), which data qualify as “*personal data*” under Article 4 (1) of General Data Protection Regulation EU 2016/679 (hereinafter referred to as: “**GDPR**”).

The present Privacy Notice (hereinafter referred to as: “**Privacy Notice**”) aims to provide information to the Data subjects on the processing of the aforementioned personal data and their rights and legal remedies in this regard, on the personal data processed by the Data controller and/or the Data processor, the purpose, the legal basis, the term of the data processing, the name and the contact detail of the data processor and in case the data are transferred, the legal basis and the recipient of the personal data transferred.

Via the present Privacy Notice the Data controller ensures that the Data subjects are informed on their rights and remedies set forth in Article 12-13. of the GDPR.

2. CONTACT DETAILS OF BAT HUNGARY

Head office (principal offices): H-1117 Budapest, Alíz street 3. (6th floor)

Company registration No.: 01-09-180925

Registering court: Fővárosi Törvényszék Cégbírósága (Companies Court of the Municipal Court of Budapest)

E-mail: kozpont@bat.com

Website: www.bat.hu

3. THE UPDATE AND AVAILABILITY OF THE PRIVACY NOTICE

BAT Hungary reserves the right to unilaterally amend the present Privacy notice with subsequent effect within the applicable statutory limitations and with prior and timely information provided to the Data subjects, as necessary.

¹ Branch offices:

HU-7622 Pécs, Dohány u. 2-8. (tobacco factory)

HU-7630 Pécs, Francia út 2. (logistics and tax warehouse)

HU-7630 Pécs, Finn u. 3. (tobacco factory, logistics and tax warehouse)

HU-2330 Dunaharaszti, Jedlik Ányos u. 31. (logistics and tax warehouse)

The present Privacy notice may be amended in particular, when a need for modification arises in case a new law or amendment of law enters into force, it is needed due to a new data processing activity or business decision.

BAT Hungary may – for the purposes of contacting the Data subjects to provide them with information in relation to the present Privacy notice or about data protection, and for the purposes of keeping in touch with the Data subjects as part of general communication – use the Data subjects’ contact details available to BAT Hungary. For instance, upon request, BAT Hungary will send to the Data subjects a copy of the latest version of this Privacy notice or confirm that the Data subjects have familiarised themselves with the present Privacy notice.

4. DEFINITIONS

Definitions and expressions used in Battle of Minds 2024 Terms and Conditions (<https://competition.battleofminds.com/terms-and-conditions>), Battle of Minds2024 Privacy Policy (<https://competition.battleofminds.com/terms-and-conditions>) and Supplementary Terms and Conditions for Entrant Teams from Hungary shall have the same meaning in the present Privacy Notice, unless the context requires otherwise.

‘personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

‘data processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

‘data controller’ means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

‘data processor’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

‘GDPR’ means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);

‘Hungarian Data Protection Act’ means Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information;

‘supervisory authority’ means an independent public authority which is established by a Member State, in Hungary it is the National Authority for Data Protection and Freedom of Information (hereinafter: NAIH);

'third party' means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

'consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

5. **THE SCOPE OF THE PROCESSED PERSONAL DATA, THE PURPOSE, LEGAL BASIS OF THE PROCESSING, ACCESS TO THE DATA**

Purpose of data processing and the data subjects	Legal basis of data processing	Scope of personal data processed	Term of data processing and manner of the data storage
<p><u>Purpose of data processing:</u> To organize the Local Consultation and Pitch Preparation during the Country Level Competition.</p> <p><u>Data subjects:</u> members of the Team Entrants of Hungary</p>	<p>As per Article 6. paragraph (1) a) of the GDPR, the consent of the data subject, that is freely given, specific, and informed.</p> <p>The consent may be withdrawn anytime without limitation or reasoning as per the below.</p> <p>Via email to be sent to: kozpont@bat.com</p> <p>The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.</p>	<p><u>Scope of personal data processed:</u> Name, email address, phone number and their school of education („Eligible Institution”) of the data subjects.</p>	<p><u>Term of data processing:</u> until the withdrawal of the consent or 6 months from the Global Final, whichever is earlier.</p> <p><u>Manner of data storage:</u> electronic</p>
<p><u>Purpose of data processing:</u> To take pictures and videos on the Data subjects during the Country Level Competition and use them on the internal and external online and offline channels of BAT Hungary (eg. Intranet, social media)</p> <p><u>Data subjects:</u> members of the Team Entrants of Hungary</p>	<p>As per Article 6. paragraph (1) a) of the GDPR, the consent of the data subject, that is freely given, specific, and informed.</p> <p>The consent may be withdrawn anytime without limitation or reasoning as per the below.</p> <p>Via email to be sent to: kozpont@bat.com</p> <p>The withdrawal of consent shall not</p>	<p><u>Scope of personal data processed:</u> Image of the Data subjects</p>	<p><u>Term of data processing:</u> until the withdrawal of the consent or 5 years from the Global Final, whichever is earlier.</p> <p><u>Manner of data storage:</u> electronic</p>

	affect the lawfulness of processing based on consent before its withdrawal.		
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6. PERSONS ENTITLED TO ACCESS THE DATA AND DATA PROCESSORS

The relevant employees of the HR department of BAT Hungary and the data processor shall be entitled to access the personal data indicated in Section 5 of the present Privacy Notice. The data controller is allowed and obliged to provide the respective authority with or transfer to the respective authority the personal data stored by them, if they are obliged by any legal provisions or by a final and binding authority or court decision. The data controller cannot be held liable for such data transfers.

If the personal data is controlled by anyone else in the name and on behalf of BAT Hungary, according to the instructions BAT Hungary, the Data controller shall use data processors that provide the same adequate level of guarantees in relation to the compliance with the requirements of the GDPR and shall ensure the same adequate technical and organizational measures to protect the rights of the data subjects. The data processor cannot use any sub-processors without the prior authorization of the data controller.

The data processor used by BAT Hungary:

Case Solvers Kft. (seat: H-1145 Budapest, Szugló utca 5. III/8.; company reg. No. 01-09-175725)

7. The RIGHTS AND REMEDIES OF DATA SUBJECTS IN RELATION TO DATA PROCESSING

The rights and remedies of the data subjects in relation to their personal data are detailed in the GDPR (namely in Article 15., 16., 17., 18., 19., 20., 21., 22., 77., 78., 79., 80. and 82.).

The below summary contains the most important provisions and BAT Hungary informs the data subjects about their rights and remedies in relation to their personal in accordance with the below.

The information shall be provided in written form or otherwise, including but not limited to electronic way. Based on the request of the data subject and only in case the Data Subject has been properly identified, the information can be also provided verbally.

BAT Hungary shall inform the Data Subjects without undue delay, but in any case, within one month of the receipt of the Data Subject's request regarding the exercise of their rights (please see Articles 15-22.) the GDPR) about the measures taken as a result of their request.

If necessary, taking into account the complexity of the requests and the number of requests, this deadline can be extended by another two months. BAT Hungary shall inform the Data Subject of the extension of the deadline, indicating the reasons for the delay, within one month of receiving the request. If the Data Subject submitted the request electronically, the information must be provided electronically, if possible, unless the Data Subject requests otherwise.

If BAT Hungary does not take measures following the Data Subject's request, it shall inform the Data Subject without delay, but at the latest within one month of the receipt of the request, of the reasons for the failure to take action, and of the fact that the Data Subject may file a complaint with a supervisory authority and exercise his right to judicial redress.

The Data Subjects shall submit their requests regarding the enforcement of their Data Subject rights set out in this Privacy Notice, as per the below:

- by post: in a registered letter with return receipt sent to BAT Hungary headquarters,
- electronically: in an email sent to the e-mail address kozpont@bat.com .

7.1. Right of access

The Data Subject shall have the right to request information from BAT Hungary, at the contact details

specified under Section 2 above, about whether BAT Hungary is processing their personal data and if so:

- which specific personal data;
- on what legal basis;
- for what purposes; and
- on what kind of timescale;

as well as to whom, when and based on what legal regulations BAT Hungary may grant access to such Personal data or to whom BAT Hungary may transmit such personal data; from what sources BAT Hungary may collect such personal data; and whether BAT Hungary uses automated decision making and if so what kind of logic, including profiling, is involved.

On the Data Subject's first request, BAT provides a copy of the personal data processed, free of charge; for any further copies requested by the Data Subject, BAT Hungary may charge a reasonable fee based on the administrative costs occurred.

With a view to data protection (privacy) compliance and the protection of the rights of the Data subject, BAT Hungary has to verify that the person requesting access is the Data subject and therefore the authentication of the Data subject is a precondition to the provision of information, granting access to the data and the provision of copies of the data.

7.2. Right to rectification

The Data subject shall have the right to obtain from BAT Hungary the rectification of inaccurate personal data concerning them by contacting BAT Hungary at the contact details specified under Section 2 above. Where the Data subject is able to demonstrate the accuracy of the rectified data to the satisfaction of BAT Hungary, BAT Hungary fulfils the request within one month and advises the Data subject accordingly at the contact details provided by the Data subject.

7.3. The right to restriction of data processing

The Data subject shall have the right to obtain from BAT Hungary, at the specified under Section 2 above, restriction of the processing of the Personal data concerning them (by unambiguously marking such data as restricted and by ensuring processing of such restricted data separately from other data) if:

- the accuracy of the Personal data is contested by the Data subject (in such cases BAT will restrict the processing for a period enabling it to verify the accuracy of the personal data);
- the processing is unlawful, and the Data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the Data controller no longer needs the Personal data for the purposes of the processing, but they are required by the Data subject for the establishment, exercise or defense of legal claims; or
- the Data subject has objected to processing (pending the verification whether the legitimate grounds of the controller override those of the data subject).

7.5. Right to erasure ('right to be forgotten')

The Data subject shall have the right to obtain from BAT Hungary the erasure of personal data concerning them without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by BAT Hungary;
- b) the Data subject withdraws consent on which the processing is based and there is no other legal basis for the processing;

- c) the Data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- d) the Personal data have been unlawfully processed;
- e) the Personal data have to be erased for compliance with a legal obligation in Union or Member State law to which BAT is subject; or
- f) the Personal data have been collected in relation to the offer of information society services.

BAT is not obliged to erase the personal data to the extent that processing is necessary, among others:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law to which BAT is subject;
- c) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right referred to above is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- d) for the establishment, exercise or defense of legal claims.

5.6. Right to remedy

Where a Data subject considers that, during the course of processing the Personal data concerning them BAT Hungary infringed the data protection requirements in force, they may

- a) lodge a complaint with the National Authority for Data Protection and the Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság, address: 1055 Budapest, Falk Miksa utca 9-11., mailing address: 1374 Budapest, Pf. 603., e-mail address: ugyfelszolgalat@naih.hu, website: www.naih.hu), or
- b) initiate a judicial procedure to secure the protection of the personal data concerning them, which shall enjoy priority at the courts. In this (latter) case, the Data subject shall be free to decide whether they wish to file their case with the court or tribunal with jurisdiction at the address of permanent residence or at the address of temporary residence of the Data subject or, alternatively, at the address of BAT's principal offices (head office).
To identify the court or tribunal with jurisdiction at the address of permanent residence or at the address of temporary residence of the Data subject, data subjects may visit <http://birosag.hu>
The court with jurisdiction at the address of BAT's principal offices is the Municipal Court of Budapest (Fővárosi Törvényszék).

Effective from: 1 August 2024
Budapest