

PRIVACY NOTICE

INTRODUCTION

The present Privacy Notice applies to the processing of your personal data* by British American Tobacco Trading EOOD, UIC 200130216 seated at Sofia, Bulgaria, 1784, residential district Mladost, 115M-115M Tsarigradsko Shosse Blvd., building D, floor 5 telephone: (2) 9769890, represented by Ms. Mila Marechkova or Ms. Marina Genkovska, separately, Managers, hereinafter referred to as “BAT Trading”, “we”, “us” and their related, in our capacity of a controller of your personal data for the purposes of the local round of **Battle of Minds, an initiative organised by British American Tobacco (Holdings) Limited (BAT)**.

You can contact BAT Trading at: bgpersonaldata@bat.com

****The present Privacy Notice applies to you if you are a participant, as a member of a team, in the local round of the initiative Battle of Minds, 2024 edition (hereinafter referred to as “Battle of Minds, 2024”).***

The local round of Battle of Minds, 2024 with participants that are current university students or recent graduates from Bulgarian universities, is held before BAT Trading under the terms and conditions of the initiative Battle of Minds, 2024.

In order to be aware of all aspects of the processing of your personal data when participating in Battle of Minds, 2024, please, see the terms and conditions for the competition, as well as the Privacy Policy of British American Tobacco (Holdings) Limited in its capacity of organiser and controller to your personal data by visiting: <https://competition.bat-battleofminds.com/>.

The present Privacy Notice is not a contract between parties, the present Privacy Notice solely aims to inform you of the ways BAT Trading deals with your personal data in connection with your participation in the local Bulgarian round of Battle of Minds, 2024. We will inform you in case of changes to this Privacy Notice.

CATEGORIES OF PERSONAL DATA WE COLLECT AND PROCESS.

The following categories of personal data will be the subject of processing for the purposes revealed herein below.

1.	Basic personal data that allows us to identify and communicate with you regarding the local round of Battle of Minds, 2024: <ul style="list-style-type: none">- Name.- Email address.- Country of residence, address.
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2.	<p>Personal data related to your eligibility to participate in Battle of Minds, 2024:</p> <ul style="list-style-type: none"> - Information that you are a university student and in which university you are studying or - Information that you've recently graduated (in the last 5 years) from a Bulgarian university and which one, as well as - Information when you've started and/or when you've finalised your studies at a Bulgarian university.
3.	<p>Data regarding concepts and opinions, part of the competition entry of your team and its presentation before a jury of BAT Trading during the local round of Battle of Minds, 2024.</p>
4.	<p>If we reasonably doubt that you do not match the criteria for participating in Battle of Minds, 2024, under the terms and conditions at: https://competition.bat-battleofminds.com/, we can request that you substantiate the facts requested by the terms and conditions of Battle of Minds, 2024. Please have in mind that BAT Trading don't mandate that you present specific types of documents or forms to demonstrate those facts, including but not only your needed status of an active student at a Bulgarian university of a recent graduate (in the last 5 years) from a Bulgarian university.</p>
5.	<p>Additional information that you decide to share with us. We would keep and process such data only if it is necessary for your participation in the local round of Battle of Minds, 2024, for example data included in any documents presented as a justification that you eligible for participating in Battle of Minds, 2024.</p> <p>If you share with us information that is not necessary for the purposes of Battle of Minds, 2024, we will destroy such information unless we have another legal basis for its further processing.</p>
6.	<p>Additional personal data for your identification only in case you are a winner of Battle of Minds, 2024, third place and you have participated in the initial local round via BAT Trading.</p> <p>For the purposes of complying with tax legislation, BAT Trading, as a company that provides a prize, should declare this prize, its value, as well as shall identify the person receiving it to relevant tax authorities, for example the National Revenue Agency. The data we would provide is: your names, your unique identification number, address, phone number. We will collect this data from you additionally, with a special declaration.</p>

HOW DO WE RECEIVE YOUR PERSONAL DATA?

Your personal data is collected in the following ways:

- **Directly from you** – during your participation in the local round of Battle of Minds, 2024 we may invite you to an interview and you, together with the other members of your team will present your competition entry and will

share related opinions and concepts. It is possible that we request you to reasonably verify your capacity of a student or recent graduate from a Bulgarian university or other facts required by the terms and conditions for participation in Battle of Minds, 2024.

- **From others** – for example:

- from British American Tobacco (Holdings) Limited, where British American Tobacco (Holdings) Limited is responsible for the website (<https://join.bat-battleofminds.com/en/challenges/edition-2024>) where you have submitted your initial competition entry for participating in Battle of Minds, 2024, as well as your data;

- from another member of your team. Please bear in mind that under the terms and conditions of Battle of Minds, 2024 the said member shall have the right to share your data and represent the team. If that is not the case, please immediately let us know.

PURPOSES FOR PROCESSING. LEGAL BASIS.

The personal data of the participants in the local round of Battle of Minds, 2024 is processed by BAT Trading for the following purposes and under the following legal basis.

Purposes for processing	Legal Basis
<p>We use your data in order to ensure your smooth participation in the local round of Battle of Minds, 2024, as well as to evaluate your participation and select a finalist for the local round of Battle of Minds, 2024.</p> <p>Also, we will process your data when we need to answer questions, you may have, and also for internal organisational and administrative purposes.</p> <p>In addition, we may use your personal data if it is necessary for us to protect our legal rights and legitimate interests, including before the competent administrative authorities or the courts.</p>	<p>We process your personal data for the purposes set out herein based on our legitimate interest, and as per our evaluation that our legitimate interest does not breach your rights or freedoms.</p>
<p>In the event that you are a winner of the Battle of Minds initiative, 2024 in third place and have participated in the local phase via BAT Trading,</p>	<p>We process your personal data for the purposes set out herein to comply with our legal obligations.</p>

BAT Trading will provide you with a prize. In order for us to do this legally, we will need additional data from you, which we will use for tax purposes subject to our legal obligation.

Special categories of personal data: We don't request and nor do we process any types of special categories of your personal data for the purposes of your participation in the local round of Battle of Minds, 2024.

NB! In case we rely on our legitimate interest to process your personal data we always evaluate the case and balance our presumed legitimate interest against your interests, rights, and freedoms, as well as those of other individuals in connection with the protection and privacy of personal data. However, if you consider that we don't have a legitimate interest to process your personal data or we breach your rights and interests, please contact us and you can request the restriction of processing of your data or exercise any of your other rights (please see Part "**What are your rights?**" below). You can contact us at: bgpersonaldata@bat.com

NB! Please, have in mind and be aware of all additional privacy policies or notices that may have been provided to you during your participation in Battle of Minds, 2024.

FOR HOW LONG ARE WE KEEPING YOUR DATA?

BAT Trading is keeping the personal data for your participation for the length of the initiative Battle of Minds, 2024, as well as for an additional period that as per our local laws represents the statute of limitations for initiating legal claims and/or legal actions, namely – 5 years. In other words, we need to continue keeping your data, so that BAT Trading can protect its interests and rights in potential legal cases or other disputes. After the expiry of that period, we destroy the personal data if we don't have any other legal basis for its legitimate processing.

HOW DO WE KEEP YOUR PERSONAL DATA SECURE AND PRIVATE?

BAT Trading ensures the privacy and security of personal data including by appropriate internal procedures and processes. We guarantee that the access to personal data is limited following a need-to-know principle. Our employees are trained to process personal data in responsible, legally compliant ways. BAT Trading relies on high-level systems and measures for data protection, as well as technical and organisational measures that meet the expectations created by best practices and are compliant with legal requirements within the EU for the protection of personal data.

WHAT ARE YOUR RIGHTS?

To comply with the legal requirements and support you in keeping your data secure and private, BAT Trading ensures and guarantees that all the individuals whose data we process can exercise the following rights:

- Right not to be subject to automated decision making: This right enables you to not be subject to a decision based solely on automated processing including profiling which produces legal effects on you or similarly affects you. BAT Trading does not use automated decision-making technologies as part of the local round of Battle of Minds, 2024.
- Right to object: This right enables you to object to us processing your personal data. We will stop such processing unless we can demonstrate compelling legitimate grounds for the processing which overrides your interests or if the processing is necessary for the establishment, exercise or defence of legal claims.
- Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities.
- Right to access your data: You may ask us for a copy of the information we hold about you at any time, and request us to modify, update or delete such information. We will respond to your request within one month. That period may be extended by two further months where necessary, taking into account the complexity and number of requests.
- Right to erasure: You have the right to request that we "erase" your personal data in certain circumstances. We would only be entitled to refuse to comply with your request for erasure in limited circumstances and we will always tell you our reason for doing so.
- Right to restrict processing: You have the right to request that we restrict our processing of your personal data in certain circumstances, for example if you dispute the accuracy of the personal data that we hold about you or you object to our processing of your personal data for our legitimate interests.
- Right to rectification: You have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you.
- Right of data portability: If you wish, you have the right to transfer your personal data to another third party, without hindrance. To allow you to do so, we will provide you with your data in a commonly used machine-readable format so that you can transfer the data.
- Right to complain: You can do so to the local regulatory body – the Commission for Personal Data Protection (the CPDP) in one of the following ways:
 - **Personally, on paper** – to the CPDP at: Sofia, Bulgaria, 1592, 2 Prof. Tsvetan Lazarov Blvd.
 - **Via post to address:** Sofia, Bulgaria, 1592, 2 Prof. Tsvetan Lazarov Blvd., for Commission for Personal Data Protection
 - **By fax:** 029153525.
 - **By using the email address of the CPDP** – kzld@cpdp.bg.

Except for the right to lodge a complaint, you can exercise your rights by writing to us, BAT Trading. You can use the address indicated at the beginning or contact us via email at bpersonaldata@bat.com.

RECIPIENTS OF DATA. HOW DO WE TRANSFER YOUR DATA?

For the purpose that you continue your participation in Battle of Minds, 2024 and only if you are a member of a winning team in the local Bulgarian round, BAT Trading will share your data, as well as information on your presentation and participation in the local round to companies within the so-called BAT Group (i.e. companies, connected by a structure of ownership and control with British American Tobacco plc.), including but not limited the organiser of Battle of Minds, 2024, namely: British American Tobacco (Holdings) Limited.

Also, your data collected in relation to your participation in the local round of Battle of Minds, 2024 may be shared with our consultants and legal advisers, as well as the Commission for Personal Data Protection or other competent state authorities and institutions in cases of claims and/or complaints or if under another legal requirement we may be obliged to share data and/or so we can protect our legitimate interests and rights under the law.

For the purposes of storing your data regarding the local round of Battle of Minds, 2024 we may use the services of suppliers of cloud storage or other digital archiving solutions.

HOW ARE WE ENSURING THE SECURITY AND PRIVACY OF YOUR INFORMATION WHEN WE NEED TO TRANSFER YOUR DATA BEYOND THE TERRITORY OF THE REPUBLIC OF BULGARIA?

For the purposes of the present Privacy Notice we may transfer your data outside the territory of the Republic of Bulgaria, to one or some of the recipients that we have listed in Part ***“Recipients of data. How do we transfer your data?”*** above.

We would like to inform you that your personal data is stored and transferred in a secure way. We would transfer your data outside the territory of the Republic of Bulgaria only to a receiving party situated in a country that can offer an identical level of protection of personal data – for example in another Member State of the European Union or the European Economic Area (EEA), as well as in countries with an active adequacy decision issued by the competent authorities in the EU that establishes that the said country presents adequate measures for the protection of personal data, also we will comply with the requirements of the EU legislation and the local laws.

What do we do in cases of data transfers to other territories, except the ones mentioned above:

- We rely on the relevant standard contractual clauses, adopted by the European Commission for the transfer of data to recipients in countries outside the

European Union as well as outside the EEA, for which there is no active adequacy decision by the European Union's authorities, as well as

- When we conclude such clauses together with any other appropriate agreement protecting the privacy of personal data we will comply with the local legal requirements as well as those under the General Data Protection Regulation.

We could transfer your data also in cases where we have received your explicit consent for such transfer (only if that is relevant for the case at hand).

OTHER CONDITIONS

We regularly review our privacy notices, and we can update them if needed. The present Privacy Notice is in its initial and last version dated, 01/08/2024r.