



## PRIVACY POLICY - AUSTRALIA

### PURPOSE

The below policy sets out how Imperial Brands Australasia ("**IBA**") complies with Australian laws when it retains personal information it has obtained from you.

References to "we", "us" and "our" throughout this document are all references to IBA.

### OVERVIEW

At IBA, we believe an individual's right to keep their personal information safe and secure is of paramount importance.

IBA is committed to protecting and maintaining the privacy, accuracy, and security of your personal and financial information.

When IBA collects and stores personal information about you, it does so in compliance with Australian privacy legislation, in particular:

- the *Privacy Act 1988* (Cth); and
- The Australian Privacy Principles ("**APPs**") which form part of the *Privacy Act*.

### MORE INFORMATION

If you would like to know more about privacy law in Australia:

- **Contact the Office of the Australian Information Commissioner on 1300 363 992 or [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au); or**
- **Access the Australian Information Commissioner's website: [www.oaic.gov.au](http://www.oaic.gov.au)**

If you would like to know more about IBA or this privacy policy, or wish to discuss a privacy related issue or complaint, please contact IBA's Privacy Officer at [anzprivacy.officer@impbrands.com](mailto:anzprivacy.officer@impbrands.com) or on **(02) 9881 0888**.

### HOW THE APPS APPLY TO IBA

The application of the APPs to our business and our relationship with you is summarised in this privacy policy.

#### *1.1 How we collect your personal information*

- Personal information refers to information that identifies you. However, we only collect information relevant to our business relationship with you. The information we collect will include contact details, personal details, financial information and information about your dealings with our company ("**personal information**").
- We will collect personal information directly from you where possible. If we use external sources we will let you know as soon as practicable. We do not collect sensitive information from you or about you.
- We also use automatic data collection tools including cookies and session tools in

connection with our website. The information collected may include the IP address you are using and the pages accessed on our website. We use this information to maintain, secure and improve our website and to enhance your experience when using it. If you would like to know more about this, please read our Cookie Policy.

- If we receive personal information about you that we did not ask for, including sensitive information, we will assess whether retention of this information is permitted under the APPs. If it is not permitted we will destroy the information or ensure that it is de-identified.
- If the information that we request from you is not provided, we may not be able to process your request for products and services, or any request for further information.

### *1.2 How we use your information*

We will limit the use of your personal information to:

- Recommending to you, or providing you with, products and services that you request from time to time.
- Carrying out our business, including marketing, sales, and distribution and all activities that relate to this.
- Fulfilling our legal requirements (for example, disclosure to law enforcement agencies or the courts).
- Any use and disclosure with your consent and for any other purposes disclosed to you at or around the time of collection.
- Offering you products and services that we believe meet your needs. If you do not wish to receive these offers please email us at [anzprivacy.officer@impbrands.com](mailto:anzprivacy.officer@impbrands.com) and request to opt out or call our Privacy Officer on (02) 9881 0888. We will act promptly on any such request.

### *1.3 Who will use your information?*

- We provide your personal information to other select organisations that perform certain functions or operations for us with your consent.
- These organisations include, but are not limited to: legal representatives, accountants and third party service providers. Some of our third party service providers are located outside Australia.
- We bind our legal representatives, accountants, local and overseas service providers to the same high standard of care as we do ourselves and enforce these requirements through contractual agreements. These organisations are not permitted to provide your personal information to anyone else or to store it.
- We also share your personal information with companies in the Imperial Tobacco Group ("ITG").

### *1.4 Overseas Recipients*

- We share your personal information in a de-identified form to our global parent in the United Kingdom. Our global parent is bound by strict UK data protection laws and our UK privacy policy can be accessed at: <https://www.imperialbrandsplc.com/privacy-and-cookies>

- We may disclose your personal information to other overseas entities and third party service providers in the course of providing our products and services to you. We will only disclose your personal information to a third party service provider that is located in another country, if we believe they are subject to a law or binding scheme that has the effect of protecting the information in a way that is substantially similar to the protection afforded by the APPs. We also ensure that such entities are bound by and agree to comply with our privacy standards.
- Before we disclose your information to an overseas recipient, we will take reasonable steps to ensure that the overseas recipient will not breach the APPs.
- Under the Privacy Act, should IBA disclose your personal information to an overseas recipient and that recipient breaches an APP, we accept that we are accountable for that breach.

#### *1.5 Withdrawing your consent*

- Please contact our Privacy Officer if you wish to withdraw your consent to any use or disclosure of your personal information at any time. We will act promptly upon receiving notice that you withdraw your consent.
- Once your consent is withdrawn we can no longer rely on your past consent for any future use or disclosure.

#### *1.6 Your information is secure*

- We will use up-to-date techniques and processes which meet current industry standards to ensure that your personal information is securely stored, and we take steps to ensure that your personal information is protected from misuse, loss, or unauthorised access or disclosure. Personal information is stored in secured premises or in electronic databases requiring logins and passwords. If you would like to know more about this, please contact us.
- Only our employees and where relevant employees of ITG and those who perform services on our behalf will have access to and are authorised to handle your personal information.

#### *1.7 Retention of your personal information*

- We will not retain any of your personal information for any longer than is required by us, except to fulfil our legal obligations.
- We are generally legally required to retain account information for seven years after an account is closed. However, we may retain some information for shorter or longer periods than this to comply with any legal requirements and meet the needs of our business.

#### *1.8 You have access to your information*

- We will, with your help, keep your personal information accurate, complete and up to date.
- You can access most of the personal information we hold about you and request corrections in the event that you believe it is incorrect. We will process such a request within a reasonable time. This right is subject to some exceptions. For example, you may not obtain access to information relating to existing or anticipated legal proceedings.
- You can request access to your information by contacting the Privacy Officer on (02) 9881

0888. This service is free unless the information you request requires significant research or preparation time. Before we act upon requests of this nature, we will tell you how much this service will cost.

- If we refuse access or refuse to make a correction, you may contact our Privacy Officer and ask that they review the decision.

#### *1.9 What to do if you think we've made an error?*

- IBA is committed to the protection of your privacy, and our policies, processes and systems have been developed with this intention. We have developed strict guidelines in order to be better placed to protect your personal information.
- If you identify an error or inaccuracy in the personal information we hold about you, we will take all reasonable steps to correct the error, or delete the information where it is no longer required by us for business or legal purposes.
- Sometimes human errors occur. If you think we have not lived up to our commitment, we invite you to contact our Privacy Officer on (02) 9881 0888.

#### *1.10 Complaints and data breaches*

- Our objective is to respond to any complaint or concern relating to the personal information we hold about you, within five working days.
- In the event of a data breach, we have systems and processes in place which are designed to mitigate the impact of the breach. In the event of a 'notifiable data breach' of your personal information, we are required to comply with mandatory reporting requirements set out in the *Privacy Act 1988* (Cth). These requirements include reporting the breach of your personal information to you, and to the Office of Australian Information Commissioner.
- For more information about our commitment to securing your personal information, contact our Privacy Officer (02) 9881 0888.
- If you remain dissatisfied with our response to any complaint or request, formal complaints can be made to the Office of the Australian Information Commissioner at 1300 363 992 or [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) or via their website: [www.oaic.gov.au](http://www.oaic.gov.au)

#### *1.11 Things you should know*

Information is current as at February 2023 and is subject to change.

This policy incorporates the relevant provisions of the Privacy Act and the APPs.

If our policy surrounding the release of personal information to overseas entities changes, this policy will be amended with notice to you.