

IMPERIAL TOBACCO GLOBAL INTERNSHIP, GRADUATE AND MBA OPPORTUNITIES

PRIVACY NOTICE

Thank you for visiting the Imperial Brands' career website for Graduate and MBA Programme opportunities and for your interest in a career with Imperial.

This notice, our "Privacy Notice", explains what personal information we collect about you online and offline in our recruitment process and how we use and share that information. We encourage you to review our Privacy Notice carefully before applying for any of our jobs.

This Privacy Notice was last updated on 1 October 2019.

It applies to all applicants applying for MBA Summer Internship, Graduate and MBA programme with Imperial Brands' companies through this career website. Applicants applying for other jobs with Imperial should refer to the privacy notice applicable to Global Careers website.

If you have any questions about how we handle or protect your personal information, please contact us using the contact details below.

In addition to the commitments set out in this Privacy Notice, Imperial Brands has a set of data privacy rules which apply to the processing of all personal information by our organisation. These privacy rules can be found at http://www.imperialbrandsplc.com/content/dam/imperial-brands/corporate/about-us/governance/Code_of_Conduct/Our_CoC/2018%20Code%20of%20Conduct_English.pdf.

Who we are

We are Imperial Brands PLC, 121 Winterstoke Road, Bristol, BS3 2LL in the United Kingdom. We are responsible for operating these online career services for the Imperial Brands group of companies.

How we collect personal information

We collect your personal information to provide you with a seamless recruitment process. We collect information from you when you register your user profile and apply for a job with us. We collect some information about you automatically, such as information collected by cookies, when you use, access or interact with us via our recruitment site. Some of the information we collect about you comes from third-parties such as analytics service providers or, depending on your "settings", social media providers.

Information we collect

We collect personal information in our drive to recruit skilled and talented people to join our teams. Personal information is any information that tells us something about you.

We collect the following kinds of personal information:

- Name
- Contact details (address, email, phone numbers)
- Nationality
- Employment history
- Information from your CV
- Information generated as part of the recruitment process, such as interview notes/scores, assessment centre scores, right to work documentation, qualifications and references
- Information generated by our online assessment, for example, online test scores
- IP address, location data and other information generated by your use of our website

We ask you to let us know about any disability for which you need us to make reasonable adjustments during the recruitment process. By submitting this information in your application, you are giving your consent to our use of this information to make reasonable adjustments for you where necessary. You may withdraw your consent at any time. If we do not have your consent, or if you do

not provide the information to us, we may not be able to provide you with the reasonable adjustments you need.

We may ask you for demographic information, such as ethnicity or religion, on an anonymous basis as part of our ongoing efforts to ensure our recruitment processes are inclusive. In certain countries we are obliged by law to monitor demographic information. Unless it is a legal requirement in your country, providing us with this information is entirely voluntary.

Additional information collected if your application is successful

Should you be successful in your application, and where the laws in your country allow it, we will conduct background checks using a third party service-provider. Background checks involve searches against criminal records, court records and checks related to credit-worthiness or credit standing. The service-provider we use varies according to your location. You will be asked to complete a "*Declaration of Consent*" which explains what information is collected.

At this stage, we will also contact the references you provide to us from your educational establishment or your previous employers.

We will use the information gathered from the background checks and from references to decide whether or not to confirm an offer of employment with Imperial.

The purposes for which we collect your personal information

Your registration on our recruitment site is voluntary but it is necessary in order to provide you with all the services listed below. Your user profile holds your personal information as well as your choices and preferences in the context of our services:

- Specifying job searches
- Providing you with job search results via email
- Administering your job applications (speculative or for particular vacancies)
- Assessing and making decisions in relation to your suitability for employment with Imperial
- Sending you invitations for video and physical interviews, assessments and online assessments
- Sending you your online assessment results
- Corresponding with you about your job application, interviews and the outcome of your application

If you agree, our recruiters may also contact you in connection with future recruitment opportunities.

Please keep your profile and personal information you have submitted up to date.

Automated decisions / profiling

Our online application form automatically checks whether you meet our minimum entry requirements (for example, specified diplomas). We also use online assessments to assess your cognitive abilities and competencies against Imperial's values. Cut off scores are set for these assessments to automate decisions about whether or not to progress a candidate through to the next stage of the recruitment process. The online assessment is carried out by an external service provider on our behalf.

You have the right to request that a member of the Imperial recruitment team manually reviews your application form and/or the outcome of your online assessments. Please contact our recruitment team at enquiry@imperialtobaccograds.com or by calling us on +44 (0)1635 279803 (our office hours are Mon-Fri, 9.00am - 5.30pm UK Time) if you would like to request this.

What is the legal basis that permits us to your personal information?

If you are based in a European country where the EU rules on data protection apply, we need to tell you the legal basis on which we process your personal information as we are only permitted to use your personal information if we have a legal basis for doing so. We rely on the following legal bases to use your personal information for recruitment related purposes:

- where we need your personal information to enter into a contract with you (for example, where we offer you a role with us);
- where we need to comply with a legal obligation; and/or
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Some personal information is classified as "special" under data protection legislation. This includes information relating to health, racial or ethnic origin, religious or philosophical beliefs, political opinions, genetic and biometric data, sex life, sexual orientation and trade union membership. This personal information is more sensitive and we need to have further justifications for collecting, storing and using this type of personal information. There are also additional restrictions on the circumstances in which we are permitted to collect and use criminal conviction data. We may process special categories of personal information and criminal conviction information in limited circumstances with your explicit consent, in which case we will explain the purpose for which the personal information will be used at the point where we ask for your consent.

The table below provides more detail about the personal information we use and the legal basis that we rely on in each case.

Purpose	Personal information used	Legal basis
Recruitment decisions	Contact details, recruitment information (such as CV, information provided in a cover letter, references), employment records, interview results, assessment centre results and online assessment details	Performance of a contract and legitimate interests. It is in our legitimate interest to evaluate whether you have the necessary skills and qualities to perform the relevant role.
Recruitment decisions	Online assessment scores	Consent
Right to work checks	Information relating to your right to work status, identification information depending on which country your role is in (for example, in the UK, national insurance number), passport number, nationality, tax status information and contact details	Performance of a contract and legitimate interests. It is in our legitimate interest to ensure that those who work for us have the right to work in their relevant location.
Fraud and crime prevention	Information about criminal convictions and offences committed by you. Identify verification information.	Compliance with laws, public interest and legitimate interest. It is in our interests as well as the interest of our candidates/employees to ensure the prevention of fraud and crime is monitored. This helps create a safe workplace for all.
Diversity monitoring	Gender, marital status and dependents and information about your race or ethnicity, religious beliefs, health and sexual orientation.	Compliance with laws and public interest.

To deal with legal disputes	Contact details, references, information submitted as part of the selection process and interview notes.	Legitimate interests. It is in our legitimate interest to process personal information to make and defend legal claims in order to ensure our legal rights are protected.
Recruitment marketing	Contact details	Consent. We rely on your explicit consent to receiving any job search emails from us and contacting you with any further recruitment opportunities.
Data analytics	Device, IP address, web pages you view and whether you interact with the content on the site, contents of forms submitted, files containing CVs.	Legitimate interests. It is in our legitimate interest to evaluate our website and its services to ensure its effectiveness. Where possible, we use this data in aggregated non-identifiable form. Where necessary, we get your consent.

What happens if you do not provide the personal information that we request?

We need some of your personal information in order to conduct the recruitment and selection process. If you do not provide such personal information, we may not be able to continue with the recruitment process or offer you employment/engagement. We explain when this is the case at the point where we collect personal information from you.

Who we share your personal information with

Through our recruitment team, we will use your personal information solely to provide you with the services set out above and to manage any applications you submit.

As part of the process, we share the personal information supporting your application with the relevant Imperial Brands department or function that advertised the role.

We are assisted by the following global service provider:

- Amberjack: recruitment partner administering the end to end recruitment process and providing the recruitment system that processes job applications and hosts your personal information, making it available to our recruitment team.
- Arcticshores: recruitment partner administering the online assessment tools included in the selection process, providing the recruitment team with the data collected from candidates during that stage of the process.

In addition to our global service provider, we may use local service providers to help us with our recruitment processes.

Site traffic information and cookies

This site uses cookies. A cookie is a small file of numbers and letters that we put on your device if you agree. These cookies allow us to distinguish you from other users of the site and tells us how you are using the site. Some cookies help us to provide you with a good experience as you browse our site; others enable us to gather information that informs how we improve our site.

When you visited imperialbrandspc.com for the first time, a popup banner asked you to accept the use of cookies. The information these cookies collect is based on your browsing device's IP-address (hardware identifier).

To delete or stop cookies generally being placed on your device, please review the help menu of your internet browser.

This site uses two types of cookies:

1. Persistent cookies which remain on your device to capture and remember your preferences (if chosen) for any future re-visit (e.g. your location).
2. Session cookies which are deleted when your browser is closed. These cookies are used for analytical services provided by Google Inc. in the US on behalf of Imperial. The analysis allows an insight into where and how our website is used so that we can continuously work on its improvement. Google will not associate your IP address with any other data held by Google. However, if you don't wish to be part of this analysis, feel free to download and install a browser plug-in to opt-out under <https://tools.google.com/dlpage/gaoptout?hl=en-G>.

For further information on the cookies Imperial uses on this website, please refer to our Cookies Policy at <http://www.imperialbrandsplc.com/Footer/Privacy-cookies.html>.

For general information about cookies, visit www.allaboutcookies.org.

How we look after your personal information

Transmission of information via the internet is not always secure. We cannot guarantee the security of the information while it is being transmitted to our site; any transmission is at your own risk. However, once we have received your information, we take appropriate security measures to prevent unauthorized access, improper use or disclosure, unauthorized modification or unlawful destruction or accidental loss of your personal information once it is under our control. We monitor compliance with our policies and take disciplinary action where appropriate. Where we use service providers, we require them to take appropriate security measures to protect your personal information.

Cross-border transfers

Imperial is a global organisation and our vacancies arise all over the world. We will pass your information to the part of the organisation with the job vacancy you have applied for where it will be used to consider your application.

Any personal information you submit via this careers site will be transmitted to Imperial's global recruitment services provider, Amberjack, which is based in the UK and hosts your personal information on servers in the European Union ("EU").

As required by the EU and other countries, robust service contracts have been put in place to ensure your personal information is adequately secured and handled in accordance with the EU's strict data protection requirements as well as Imperial's instructions. A copy of the relevant data privacy clauses agreed with our service providers are available on request by contacting us using the details below.

Transfers within the Imperial Brands group of personal data originating in the EU are governed by internal data processing agreements.

How long we hold it for

We will keep your user profile and (if any) application data for as long as legally required in a particular country. If your application is successful and you are hired by an Imperial Brands company, your personal information collected during the recruitment process will be used to form the basis of your employment record and retained for the duration of your employment.

If your application is unsuccessful, unless there is a legal reason to keep it, your information will be kept for a maximum of 12 months from the date the record was last modified when it will be deleted.

There will be some circumstances where we have statutory obligations to keep your personal information for a longer period or where it is necessary in case of a legal claim. If this is the case, you will be informed accordingly.

You can access and change/delete your user profile's content at any time and may also request that your entire user profile be deleted from our database.

Your information rights

You have the right, within certain legal parameters, to:

- be informed about how we use your personal information;
- obtain access to your personal information that we hold;
- request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate;
- ask us to erase your personal information in certain circumstances;
- ask us to restrict our information processing activities in certain circumstances;
- ask us for a copy of certain personal information that you have provided to us in a commonly used electronic format;
- object to our processing of your personal information; and
- not be subject to automated decisions about you and to request human intervention.

For more information and to exercise your rights, please contact us using the details below.

Contact us:

If you have any questions, concerns or complaints relating to the handling of your personal information and your privacy, please email data.protection@uk.imptob.com.

Lodging a complaint

If we cannot resolve your complaint, you have the right to complain to the UK's Information Commissioner's Office at <https://ico.org.uk>.

Changes to this Privacy Notice

We will keep this Privacy Notice updated and, if you still have a user profile, keep you informed of any material changes to the way we process your personal information. We encourage you to read about the changes so that you keep up to date. The date this Privacy Notice was last updated appears at the top of the page.