

### Information clause for registered consumers

1. The controller of your personal data within the meaning of the GDPR is Philip Morris Polska Distribution Sp. z o. o. with its registered office in Kraków (31-982), al. Jana Pawła II 196 (PMPL-D).
2. We process your data for the purposes of: verification of the age and status of the user of PMPL-D products; order fulfilment; payment processing; provision of warranty services; provision of sales services; sale of PMPL-D products (to the extent permitted by law); business analytics, market research, system audits and fraud prevention, product improvement, and device diagnostics and updates.
3. You have the right to access your personal data, rectification, erasure, restriction of processing, data portability, and the right to object to the processing of personal data. In order to exercise these rights, please contact us at: e-mail: [contact.pl@iqos.com](mailto:contact.pl@iqos.com) or by phone: 801 801 501 or (+48) 22 455 14 04 (call cost according to the operator's tariff).
4. The legal basis for the processing of personal data is:
  - a) Article 6(1)(f) of the GDPR - legitimate interest of PMPL-D related to:
    - providing sales and product support services to our customers (e.g. correspondence with you, general administration and problem solving),
    - providing points of contact with PMPL-D, providing electronic devices launched by PMPL-D, and providing support (e.g. enabling the use of points of contact with PMPL-D and electronic devices of PMPL-D and improving the comfort of using them),
  
    - analysing and improving our business results (e.g. business analytics, statistical, or scientific purposes), our products, points of contact with PMPL-D, points of sale and events, and engaging others in the promotion of PMPL-D products, if your interests, rights, and freedoms regarding the protection of information about you are not overriding them.
  - b) Article 6(1)(b) of the GDPR - the necessity to perform the contract concluded with you, in the case of managing your account in order to provide support as part of purchases or to provide after-sales service; we use this information to fulfil our contractual obligations towards you as a buyer or borrower of products launched by PMPL-D (e.g. fulfilling your orders, processing your payments, providing warranty service, and providing support services), as well as to support your security and the security of PMPL-D, as well as to prevent abuse.
  - c) Article 6(1)(c) of the GDPR - fulfilment of the legal obligation due to the need to comply with the obligation to sell products only to adults (verification of the age and status of the user of our products);
  - d) Article 6(1)(a) of the GDPR - consent to the transfer of marketing information about our products (e.g. development of marketing strategies, management of marketing campaigns), sending you information regarding your management of PMPL-D devices.
5. Your personal data may be transferred to third parties, i.e.:
  - a) PMI affiliates, that is members of the Philip Morris International group;
  - b) third parties who provide PMI affiliates or you with products or services;

- c) carefully selected business partners in areas connected to our products, so that they can contact you with offers that they think may interest you, in accordance with your preferences;
  - d) third parties where permitted or required by law.
6. The provision of personal data is voluntary. The consequence of not providing personal data, providing incomplete or even partially untrue or incorrect personal data, is the inability to register in the PMPL-D consumer database.
  7. Consent can be withdrawn at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
  8. Your data will be transferred to third countries (i.e. outside the European Economic Area, including the European Union, Norway, Liechtenstein, and Iceland).
  9. We will process your personal data for profiling purposes, i.e.:

a) personal data in the form of:

- data related to the use of PMPL-D devices, the period of use of these devices;
- tobacco sticks variants used;
- behavioural data, i.e. related to the use of websites belonging to PMPL-D, interaction with PMPL-D marketing communications, use of promotional offers for PMPL-D products;

in conjunction with data allowing your identification (e.g. consumer identification number specified in the PMPL-D system), may be processed by us for the purpose of sending you information related to your management of PMPL-D devices and/or sending you relevant commercial information.

The profile referred to above will be created in an automated manner by compiling the data indicated in point 9a.

b) personal data in the form of: data listed in point 9a, contact details (e.g. address, telephone number assigned to your profile and used to send SMS); data from your mobile or desktop device and software (e.g. your IP address or unique device identifier (e.g. Mobile Ad ID (MAID) or Android ID (SSAID))), location data (general location (derived from your IP address, in which case the information we hold will be of a general nature, e.g. the city in which you are located) or your precise location (if you choose to share it with us for specific purposes, e.g. for the needs of a store searcher)), make and model of your device (some of which may be used as part of “digital fingerprinting”) and details related to cookies (or similar technologies) that we may have stored on your device), may be processed by us to prevent: abuse, fraud, actions violating decency, applicable regulations, or applicable laws which negatively affect security (for example, in the context of our promotions, contests, and surveys to ensure that the same person does not enter them more than once, or in the context of online sales to protect cardholder data).

The profile referred to above will be created in an automated manner by compiling the data indicated in point 9b.

10. Personal data will be processed for the period of:

**a) direct sales (including marketing communication) (if you use digital points of contact and we are able to contact you)**

Most of the information contained in the marketing profile is kept for the duration of our marketing relationship with you; for example, while you continue to use the digital touchpoints (website) or respond to our communications. However, some elements of your marketing profile, such as records of how we interact with you, naturally go out of date after a period of time, so we delete them automatically after defined periods (typically 3 years) as appropriate for the purpose for which we collected them.

**b) marketing to you (including marketing communication), (if you are not in contact with us)**

This scenario is the same to the one above; however, if there is no contact for a long period of time (typically 2 years), we will stop sending you marketing communication and delete your history of responses to them. This will happen, for example, if you never click through to an invitation to an event, log on to a digital touchpoint, or contact customer care, during that time. The reason is that in these circumstances, we assume you would prefer not to receive the communications.

**c) marketing to you (including marketing communication), (if you are not contactable)**

If you have registered to receive marketing communications, but the information you give us to contact you doesn't work, we will retain your details for a period of typically only 6 months to allow you to return and correct it.

**d) marketing to you (including marketing communication) (incomplete registration)**

In you commence registering yourself in a database, but do not complete the process (for example, if you don't complete the age verification process, or you don't accept the touchpoint's terms of use), we will store your data for a maximum of 30 days to allow you to complete the process if you decide to return, depending on the type of missing information.

**e) market research**

In the case you are not registered in our database for other purposes (e.g. marketing communication, warranty, customer service), and we use publicly available information about you in order to understand the market or your preferences, we will retain the information about you for a short period in order to perform the particular item of market research.

If we collect information about you as part of other market research, we will retain these information:

- for the purposes of the relevant part of the market research for the reasonably required period (usually no longer than one year); and
- for the purpose of demonstrating fair practices for as long as we need to be able to demonstrate that this purpose has been achieved, which we will review regularly to determine whether retention is still required.

**f) purchases, loyalty transactions, and warranty**

If you purchase goods or make a loyalty transaction, we will retain information about this for the period necessary to complete the sale, and to comply with any legal obligations (for example, for tax and accounting purposes and fraud prevention purposes). If you also register for a warranty for a device, we will retain details of this for so long as relevant to the warranty.

**g) customer care**  
If you contact customer care, we will make a record of the matter (including details of your enquiry and our response) and retain it while it remains relevant to our relationship, for example if you need us to replace a device under warranty, or if your recent enquiries are relevant. Temporary records (for example, an automated recording of a telephone call in which you ask us to direct you to a retail outlet) may be relevant only until more permanent records are made, and will be retained only temporarily.

**h) system audits and fraud prevention**

System audit logs are typically kept for up to six months for system recovery purposes and for up to 10 years for fraud prevention purposes.

**i) business analytics**

Most business analytics data is retained for the duration of our marketing relationship as described in point 10 a) above. However, some items, such as certain device information (if you choose to provide it to us), will become outdated after a certain period of time and will therefore be automatically deleted after a certain period of time depending on the purpose of its collection.

**j) device data**

We store data collected from your device (if you choose to provide it to us) for various periods, depending on the purpose of its use:

- product improvement: 5 years (or less if the marketing profile is removed);
- business analytics: 5 years (or shorter if marketing profile is removed);
- device diagnostics and update: deleted immediately after the service is provided;
- demonstration of fair treatment of the consumer: 10 years.

**k) age verification**

Detailed information provided to us for age verification purposes are deleted once the verification process is complete. We carry out several such processes, so a process-specific retention period is maintained, ranging from a few minutes to six months. We keep certain detailed information separately for fraud prevention purposes - see above.

**l) claims**

For the period of limitation of claims in connection with the determination, defence, and pursuit of claims, archiving data and documents, or responding to letters, applications, and requests.

11. You have the right to file a complaint with the supervisory authority (President of the Office for Personal Data Protection, ul. Stawki 2, 00-193 Warszawa; [www.uodo.gov.pl](http://www.uodo.gov.pl)).
12. Information clause of 08.12.2022