

PERSONAL DATA PROCESSING INFORMATION FOR THE SHAREHOLDERS OF PHILIP MORRIS ČR A.S.

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter referred to as the "GDPR"), Philip Morris ČR a.s., having its registered office in Kutná Hora, Vítězná 1, postcode 284 03, registered with the Commercial Register maintained by the Municipal Court in Prague under file no. B 627 (hereinafter referred to as the "Company"), hereby informs its shareholders and their representatives of the principles and procedures regarding the processing of the personal data of the shareholders of Philip Morris ČR a.s., in connection with the holding of the General Meetings of the Company, the maintenance of the list of shareholders, the potential payment of dividends, and the fulfilment of other obligations pursuant to Act No. 90/2012 Coll., on Business Corporations and Cooperatives, as amended.

PERSONAL DATA CONTROLLER:

The personal data controller is Philip Morris ČR a.s., having its registered office in Kutná Hora, Vítězná 1, postcode 284 03, registered with the Commercial Register maintained by the Municipal Court in Prague under file no. B 627 (hereinafter referred to as the "Company").

PURPOSE OF PERSONAL DATA PROCESSING:

The Company processes the personal data of its shareholders, their potential representatives, and/or accompanying persons (hereinafter the "Shareholder(s)") for the purposes of:

Compliance with its legal obligation:

For the purposes of holding the General Meetings, paying dividends, maintaining the list of shareholders, and exercising other rights, the Company is obliged to process the Shareholders' personal data in order to comply with its obligations arising from the applicable legal regulations.

Protection of its legitimate interests:

Further processing of the Shareholders' personal data is necessary for the purposes of protecting the legitimate interests of the Company, in particular ensuring the proper conduct of the General Meetings, documenting voting results, preparing the minutes of the General Meetings, recording the General Meetings, resolving matters related to the distribution and payment of profit shares, as well as exercising other rights, particularly in the event of handling complaints, lawsuits, and the exercise of supervision by state authorities. For this purpose, the Company must process data on who was a shareholder on the record date, how many shares they held, which shareholders attended each particular General Meeting (perform registration), and what protests, counterproposals, or questions they raised. The Company must also be able to document the voting data of each shareholder in the event of a dispute.

PERIOD OF PERSONAL DATA PROCESSING

The Company shall only process the Shareholders' personal data for a period of time appropriate to the purpose for which the personal data are processed. The scope of personal data processing and the retention period shall not exceed 10 years following the termination of the particular Shareholder's equity participation in the Company, unless legal regulations provide for a longer period of time.

SCOPE OF THE DATA PROCESSED

The Company shall process, in particular, the personal data of the General Meeting participants to the extent necessary for preparing the minutes of each particular General Meeting (including notarial records), documenting the proceedings of the General Meeting, and recording the General Meeting.

RECIPIENTS OF PERSONAL DATA

The Company shall provide the personal data of Shareholders or their representatives to processors and also to recipients of personal data, which include state administration authorities and other entities within the exercise of statutory rights and fulfilment of statutory obligations. This shall not relieve the Company of its responsibility for the processing of the Shareholder's personal data or for their protection.

RIGHTS OF DATA SUBJECTS

The Shareholders shall have the right:

- a) to access their processed personal data, to rectification, erasure, or restriction of processing thereof;
- b) to object to such processing;
- c) to lodge a complaint with the supervisory authority – the Office for Personal Data Protection, Pplk. Sochora 27, postcode 170 00, Prague 7, www.uoou.cz;
- d) to withdraw consent to the processing of personal data at any time with future effect (if consent is required for the processing of personal data);
- e) to obtain confirmation from the controller as to whether or not their personal data are being processed;
- f) to obtain from the controller without undue delay the rectification of any inaccurate personal data concerning them. Taking into account the purposes of the processing, the data subject shall have the right to have any incomplete personal data completed;
- g) to obtain from the controller the erasure of personal data concerning the data subject without undue delay (also known as the right to be forgotten), and the controller shall have the obligation to erase the personal data without undue delay based on the exhaustive list of grounds specified in the GDPR: i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; ii) the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing; iii) the data subject objects to the processing and there are no overriding legitimate grounds for the processing; iv) the personal data have been unlawfully processed; v) the personal data must be erased for compliance with a legal obligation under Union or Member State law to which the controller is subject; vi) the personal data have been collected in relation to the offer of information society services. Details and exceptions regarding the exercise of this right are regulated by the GDPR;
- h) to obtain from the controller restriction of processing where one of the following applies: i) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; ii) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; iii) the 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 defence of legal claims; iv) the data subject has objected to processing, pending the verification whether the legitimate grounds of the controller override those of the data subject;

i) to data portability, i.e., to receive the personal data concerning them, which they have provided to a controller, in a structured, commonly used and machine-readable format, and the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where: i) the processing is based on consent or on a contract, ii) the processing is carried out by automated means;

j) to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them, including profiling based on the provisions of the GDPR. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims;

k) not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them. Exceptions and details are laid down by the GDPR.