



Privacy Notice for Business Partners (B2B)

This policy applies to the processing of personal data by:

JT International Luxembourg S.A.

25 C, op Zaemer

4959 Bascharage

Luxembourg

Company registration number: B58197

Hereinafter referred to as “JTI”.

Last updated: September 2026

1. Introduction and Purpose

JTI attaches great importance to the protection of personal data and processes such data in accordance with the General Data Protection Regulation (GDPR).

This privacy notice applies to the processing of personal data of employees, representatives and contact persons of our business partners, including suppliers, customers and other commercial partners.

JTI acts as the data controller for the processing activities described in this notice.

2. What personal data do we process?

We only process personal data that is necessary to enter into, perform and maintain our business relationships. The personal data we process is received directly from the data subjects, through their employer (for example, when retailer employees are listed as contact persons), or from publicly available sources. This may include:

- First and last name
- Business contact details (email, telephone number, job title)
- Company name and address details
- Correspondence and communication
- Contract and invoice details
- Login data for portals (if applicable)

We do not process special categories of personal data of our business partners.

3. Purposes and legal bases for processing

We process personal data of our business partners for the purposes listed below and on the corresponding legal bases:

- Maintaining the business relationship — Legal basis: legitimate interest (relationship management and business communication).
- Executing and managing agreements — Legal basis: performance of a contract.
- Delivery of products or services — Legal basis: performance of a contract.
- Administrative purposes, such as invoicing, financial administration and contract management — Legal basis: performance of a contract and legal obligation (including tax retention obligations).
- Communication regarding projects, services or cooperation — Legal basis: legitimate interest (business operations and efficient communication).
- Compliance with legal obligations, including tax and accounting legislation — Legal basis: legal obligation.
- Security of our systems, premises and data — Legal basis: legitimate interest (security and fraud prevention).

No automated decision-making or profiling takes place.

4. With whom do we share personal data?

We only share personal data when necessary. Potential recipients include:

- IT and cloud service providers who maintain systems for us
- Logistics or financial service providers
- Legal or tax advisors
- Government authorities where legally required

We conclude data processing agreements with parties that process personal data on our behalf.

5. Transfers outside the EU

Where personal data is transferred within the European Economic Area (EEA), we do so only when appropriate safeguards are in place, such as:

- An adequacy decision from the European Commission

JTI Intercompany Transfers

Where necessary for maintaining and performing our business relationships, personal data may be transferred to other JTI entities. JTI has implemented an IntraGroup Transfer Agreement (IGTA) to ensure a secure and compliant transfer of personal data.

6. Retention periods

We do not retain personal data longer than necessary for the purposes for which it was collected. We apply the following retention periods:

- Contract and administrative data: at least 10 years after the termination of the cooperation, in accordance with the Luxembourg retention obligation under the Commercial Code.
- Communication data: as long as necessary for the purposes or legal obligations.

7. Security of personal data

We take appropriate technical and organisational measures to protect personal data against loss, misuse, unauthorised access and unwanted disclosure. Examples include:

- Access control and authentication
- Encrypted connections
- Regular security updates
- Limited access based on role and necessity

8. Rights of data subjects

Data subjects have the right to:

- Access their personal data
- Correct inaccurate data
- Request deletion of personal data (where possible)
- Restrict processing
- Object to processing
- Request data portability

Requests can be submitted via our privacy contact email: DataPrivacy.Luxembourg@jti.com .

9. Contact and complaints

For questions about this privacy notice or our data processing, you can contact us via:

- Email: DataPrivacy.Luxembourg@jti.com
- If you believe that we are not complying with data protection law, you may file a complaint with the Data Protection Authority (CNPD).

10. Changes to this privacy notice

We reserve the right to amend this privacy notice. The most recent version is available upon request.