



### PMI THIRD PARTY PRIVACY NOTICE

1. Like all businesses, PMI affiliates use personal information relating to third parties (and their employees and representatives) with whom they interact. Such third parties include suppliers, service providers, third party contractors, retailers, government offices, visitors, people who communicate with us, and people who read our electronic publications (collectively, “**Third Parties**”). The information may include name, address, places of business, and contact details; trade-related data (e.g. sales data); bank account information; system user information, automated records of the use of information systems; information for building access control systems; identification information (including photographs, biometric data, and video recordings); and information submitted to us when using information systems that PMI affiliates operate. For details of the PMI affiliates and the countries in which they are established, see the relevant country pages of [www.pmi.com](http://www.pmi.com).
2. PMI affiliates use personal information in a number of different ways:
  - (a) PMI affiliates use personal information for their business purposes. These purposes include legal, personnel, administrative and management purposes (including procurement; administering the business relationship with the Third Party; administering commercial programmes; processing payments; correspondence; IT systems development, operation and maintenance; building access controls; the operation of contact databases and collaboration tools; performance review; maintaining the security of buildings; operating a safe environment, security of PMI and staff and visitor property; administering contractual arrangements with suppliers (for example, video recordings for delivery of goods, or for ensuring that restricted areas of buildings are accessed only by certain individuals or are used appropriately));
  - (b) where necessary for the administration of the relationship with a Third Party (and permitted by law), PMI affiliates may use personal information legally classified as “sensitive”. This may include data relating to trade union membership (for example, to comply with collective agreements); racial or ethnic origin (for example, for monitoring equal opportunities); and criminal background checks (for example, where security or reputation are sensitive);
  - (c) PMI affiliates make personal information available to each other for them to use for their own benefit, for the same purposes as described in (a) and (b) above; and
  - (d) PMI affiliates also make personal information available to:
    - (i) other third parties who provide them with products or services (such as advisers, payment service providers, and information services providers) for the same purposes as described above; and



- (ii) other third parties, where required or permitted by law, for example: regulatory authorities; government departments; and in the context of organisational restructuring.
3. As with any multi-national organisation, PMI affiliates transfer personal information globally. Accordingly, personal information as described above may be transferred either within or outside the country or territory where that person is based (their “**Local Country**”), including to a country or territory that may not have data protection standards equivalent to those of the local country. For example, PMI affiliates within the European Economic Area and Switzerland (“**Europe**”) may transfer personal information to PMI affiliates outside of Europe for the purposes described in this notice. In all cases, PMI affiliates will implement adequate measures (including appropriate security measures) for the treatment of personal information in those countries or territories in accordance with applicable data protection and privacy laws.
4. Individuals may request access to personal information about them that PMI affiliates hold, or request the correction or deletion of that personal information, by contacting the PMI representative responsible for managing the relationship with the Third Party they represent. Alternatively, they may e-mail their request to [privacy@pmi.com](mailto:privacy@pmi.com).