Your specific information for the use of the means of legal age verification

Data Controller for the processing of your personal data is the company under the name **"PHILIP MORRIS CYPRUS LTD",** with its registered office at Fotis Pitta 4, 1065, Nicosia, Cyprus, with registration number HE420512 (hereinafter referred to as the **"Company"** or **"We"**).

1. What is the Purpose

1.1 Our Website and all our Programs are addressed to adults only; you declare responsibly to us that you are of legal age at the age gate when entering and/or using our Website and your Account. Our Company must, however, confirm that legal age for the sale of PMIProducts to you, due to their nature, as well as when offering services to you related to any of our Programs ("the Purpose").

1.2. You are given the possibility to choose the mean that best suit you in order to fulfill this Purpose since you can opt either to conduct remote age verification by scanning your face or other remote age verification methods as applied by the Company from time to time and/or alternatively to verify your age with physical means (by visiting one of IQOS stores). In any case, if you choose technical means of remote age verification for your purchases via our remote channel www.cy.iqos.com these tools are the necessary and appropriate ones to fulfil our Purpose remotely.

1.3. For the avoidance of any doubt legal age in Cyprus is considered over 18 years.

1.4. This legal age verification procedure appears to you, at this stage, since this verification was not previously completed in any other way or in another sales or communication channel with our Company (e.g. in the physical store, call center, previous remote purchase or other).

2. What data we process about you and how we process it

You are free to choose one of the means of remote or physical legal age verification we offer as laid down below.

The personal data we process for the purpose of legal age verification is limited to what is strictly necessary, appropriate and relevant to fulfil this purpose.

In particular, depending on the way you opt to conclude your legal age verification:

a) With regard to the process of legal age verification through the scanning of your face, this takes place with the use of the camera of the device you are using while you are in our Website; we only conduct legal age verification with a general analysis of your face characteristics by means of an AI technical application (you may see more detailed

information at https://www.yoti.com/privacy/age-verification/) based on a statistical estimation of general age parameters analyzed by the system, with a minimum error rate. This process is carried out real time, without any storage of your face characteristics in PMI or Yoti's systems, it does not involve identification, authentication, or comparison against any database, and is not intended to uniquely identify you. As such, it does not constitute processing of special categories of personal data within the meaning of Article 9 GDPR.

b) With regards to physical verification, in IQOS Stores our agent (sales person) will confirm your legal age in person and/or requesting to show an appropriate government issued document that proves your adulthood. No copies are taken and no such documents are recorded or stored by the Company.

3. Information regarding the procedure of remote age verification in specific

3.1 When you opt for the remote legal age verification (scanning of your face based on a statistical estimation of general age parameters), You must follow the instructions given to you in our Website correctly. In order to be able to proceed with your remote transaction and/or receive the services of a Program, you must successfully complete the process of legal age verification, as applicable per case.

3.2 In case that the scanning of your face cannot be successfully concluded for any reason, three times, you can opt to have a physical verification by purchasing in Store.

3.5 In case the remote legal age verification is not fulfilled with the mean set above, we follow a process of automatic log out from your Account.

4. Method of collection and legal basis for processing of data

4.1 The information mentioned in Article 2 above is generally provided by you to us directly.

4.2 The process of legal age verification is based on our legitimate business interest to sell PMI products only to adults that is not overridden by your interests, rights and freedoms to protect information about you. Our legitimate interest is reinforced by the legal obligations we have in preventing access to PMI products and services by individuals who are under the applicable legal age, as further explained in our general Privacy Policy.

You can freely choose among the available methods of age verification depending on what you prefer. Where remote age verification methods are used, these are implemented solely for the purpose of verifying whether you meet the legal age requirement and are not used to identify you. If you prefer not to use a specific remote method, you may opt, for an alternative age verification method involving human intervention, as described in Article 3.2.

4.3 Once your legal age is verified, you may continue making transactions via www.cy.iqos.com, and/or participating to our Programs and receiving the services, notwithstanding however any re-verification or new confirmation that our Company may deem necessary at its discretion, for any reason at any stage and for any of its programs or services.

4.4 You may ask to unsubscribe at any time from our Adult Smokers Database by deleting your account with us on your profile on www.cy.iqos.com, by sending an email to contact.cy@iqos.com, or by calling the telephone line **800 088 03**, or by completing the contact form at the following link: https://cy.iqos.com/en/contact-us**.**

In the event you exit from the Adult Smokers Database, the whole process of legal age verification may be repeated in the future, depending on the applicable procedures of our Company at the time you opt to re-register or re-transact.

5. Categories of Recipients

For the due fulfillment of the above procedures, we cooperate with trusted, reliable and reputable provider of remote legal age verification services that are able to meet and respond to all the appropriate guarantees of data protection and security of their systems and their procedures based on the legal requirements and the strict conditions set by the policies of PMI. We may also cooperate for this process and for the completion of the Purpose with our parent company and/or our subsidiaries and/or our Group affiliate companies. Transfers to third countries, if any, are based on compliance with appropriate safeguards under applicable law, including also transfer to a country that has obtained an adequacy decision for Yoti (UK).

In addition to the above, all the provisions of our general Privacy Policy apply and complements the present information; you are informed of our Privacy Policy and accept it when you choose to use the tools of remote age verification.

These products are not risk free and provide nicotine, which is addictive. Only for use by adults who would otherwise continue to smoke or use other nicotine products.