

Global Candidate Privacy Policy

This policy tells you how we collect and use information when considering you for employment with Global.

1. What is in this policy?

It tells you:

- what information we might collect about you
- how we might use that information
- when we might use your details to contact you
- what information of yours we might share with others
- your rights about the personal information you give us

2. Who are we?

We are Global, the Media & Entertainment group. Global is Europe's largest radio company home to some of the biggest brands in commercial radio, namely Capital, Heart, LBC, Classic FM, Smooth, Capital XTRA and Gold. Our portfolio also includes our digital platform PopBuzz, our outdoor advertising companies Primesight, Outdoor Plus, Exterior Media and our licensed broadcast partner Communicorp.

3. What personal information do we collect?

Personal data is any information about an individual from which that person can be identified. Personal information does not include anonymous or non-personal information, i.e. information that cannot be associated or tracked back to a specific individual.

There are also special categories of personal data (i.e sensitive data) which includes information regarding racial or ethnic origin, political opinion, religious belief, sexual orientation, membership of a trade union, physical or mental health/conditions, biometric and genetic information and alleged or actual criminal offences.

When we consider you for opportunities at Global, the types of information we collect and process include:

- Your name, contact information (such as home address, phone number, email address), gender, work permit or visa information, your employment and education history, your qualifications, skills or experience, referrals or references, and whether you are subject to any prior employer obligations, and any other information that you provide (such as information included in your CV or cover letter)
- Desired salary, willingness to relocate, other job preferences
- Results of pre-employment screening checks where necessary
- If you are being referred, we process information that the person referring you provides about you
- Information that you make publicly available such as contact information, your education and work experience information (e.g. when you share information

via job search and career networking sites as far as it is relevant to consider you for career opportunities)

- Interview details and outcomes of any recruiting exercises that you complete
- Assessment results e.g. psychometric assessment results and video or telephone assessments;
- CCTV footage as well as your photographic image for security and identification purposes if you attend for interview;
- Equal opportunities monitoring information, including information about your gender, ethnic origin, sexual orientation and religion or belief;
- Information we need to make reasonable adjustments for you to attend for interview or participate in other assessments

Note: We collect some information because we are required to collect it under applicable law or need it to move forwards with your application. We'll tell you if the information is required when we ask you to provide it. We'll use any information that you submit in accordance with this Policy.

4. How is your personal data collected?

Generally, we collect personal information directly from you when you apply directly for employment with us or information that we are provided with by third parties e.g. recruitment agencies.

We may also collect personal information about you from other third parties, for example, when a referee provides information about you, when a Globaler recommends we consider you for a position with us or from other sources where you have made your information publicly available for the purposes of recruitment such as LinkedIn or other social media and databases.

5. How do we use your personal data?

We use your information for the following purposes:

(a) We process your information as necessary to consider you for, and assess your suitability for, employment opportunities with Global

We process information:

- To receive, review and reply to your application
- To verify the information you or others provide, and to check your references
- To assess your suitability for the opportunity you applied for, and in certain cases, for other opportunities at Global
- To facilitate the interview/recruiting process
- To prepare an offer letter, if your application is successful

(b) We process your information to stay in touch and engage with you

In considering you for opportunities at Global, we may consider you for current and future opportunities. You can request we do not consider you for future opportunities at anytime.

(c) We process your information to maintain and improve our recruiting processes, for internal planning and management reporting and to comply with laws and regulations

We process your information:

- To manage and improve our Careers portal and our recruiting processes, for example, to make the application process easier and more efficient
- To prepare and perform management reporting and to perform analysis related to recruiting metrics, such as length of the recruiting process
- To create and submit reports as required by applicable law or regulation

(d) If you accept an offer from us, we process your information for background verification

We will provide additional information regarding this processing upon start of the background verification process.

6. What is our legal basis for processing your information?

We process the data that we have in the ways described above:

- As necessary to prepare and enter into an employment contract with you
- Consistent with specific consents, which you may revoke at any time
- As necessary to comply with our legal obligations
- To protect your vital interests or those of others
- As necessary for our legitimate interests, including for current and future employment opportunities, and in managing and improving our recruitment and hiring processes, unless those interests are overridden by your interests or fundamental rights and freedoms, which require protection of personal data

Special category data

Special category or sensitive personal data is information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

We may process such data where necessary for the establishment, exercise or defence of a legal claim by us, with your explicit consent or where necessary for the purpose of carrying out our obligations and for the exercising of our rights or your rights in the context of employment or social security law. For example, we may

need to process information about your health to accommodate any special needs you have when you come on site for an interview.

7. Who do we share your personal information with?

Your information will be shared with our employees, consultants and other parties who need access to such information in the performance of their roles when they assist us with our recruitment processes.

Third parties

We may need to share your information with partners who provide recruitment and candidate interview and assessment services;

We will share your data with third parties to conduct pre-employment background checks (i.e. criminal and credit history checks);

We may also need to validate the information you have provided to us and share it with academic institutions, previous employers and those who may act as referees.

If you are successful in your application we will also share your data with third parties that process data on our behalf, in connection with the administration of our HR system, payroll, the provision and administration of employee benefits (including pension, private health insurance, life assurance and group income protection) and the provision of occupational health services.

Where we engage third parties to process personal data on our behalf, these third parties will operate under a duty of confidentiality and will be obliged by contract to implement appropriate technical and organisational measures to ensure the security of data. We do not allow our third-party service providers to use your personal data for their own purposes – we only permit them to process your personal data for specified purposes and in accordance with our written instructions.

8. How long do we keep your information for?

We hold personal data for different purposes and the length of time we keep your information will vary depending on the services or products we are providing. We will only keep your data for a reasonable period of time, which is based on the purpose for which we are using your data. Once that purpose has been fulfilled, we will securely delete that data or anonymise your information (so that we, or anyone else, can no longer tell that data relates to you) unless we are required to retain the data longer for legal, tax or accounting reasons.

To determine the period we store personal data, we always stick to these principles:

- we will only keep your information for as long as we need to
 - we think about what type of information it is, the amount collected, how sensitive or intrusive it might be and any legal requirements
- we design our services so that we do not hold your personal information longer than we have to

If you are successful in your application for a position at Global, we retain the information that you provide during the application process, and information about your application process, as part of your employee records.

9. International Transfers of Personal Information

Personal information which you supply to us is generally stored and kept inside the European Economic Area.

However, due to the nature of our business and the technologies required, your personal information may be transferred to a third party service provider outside the EEA. These countries may not have the same data protection laws, including a lower level of protection.

If we do need to transfer your personal information in this way we take steps to ensure your level of privacy including data minimisation, anonymising or pseudonymising data, undertaking due diligence on the recipients and putting in place contractual obligations on them to take care of your data, for example EU model clauses, or in the case of US recipients, a Privacy Shield certification.

10. Your rights in relation to how we use your personal information

Data Protection laws give you certain rights in respect of your personal information. You have the following rights:

- **Right to rectification**
The right to have your personal data corrected if it is inaccurate or incomplete.
- **Right of access**
You have the right to obtain your personal data from us. This is referred to as a data subject access request.
- **Right to be erasure (“right to be forgotten”)**
You have the right to be forgotten.
- **Right to object and opt-out of marketing**
You have the right to object to the processing of your personal data. This includes the right to object to direct marketing. You will always be given the opportunity to opt-out of further direct marketing when you receive such communications from us or you can contact us at crm.marketing@global.com
- **Right to portability**
You have the right to move, copy or transfer certain personal information
- **Right to restrict processing**
You have the right to restrict the use of your information in certain circumstances
- **Right to opt-out of automated individual decision-making (including “profiling”)**

You have the right not to be subject to a decision based solely on automated processing, including profiling, which significantly affects you or produces legal effects.

If you wish to submit a request in relation to any of your rights above, please contact us at: privacy@global.com. Please note you will be asked to supply us with proof of identity before we will be able to provide you with a response

11. Contact Us and Complaints

The data controller responsible for your personal information is Global Media & Entertainment Limited.

If you do have any concerns we would like you give us the opportunity to know about them so we would encourage you to contact us first so we can try and to help you: privacy@global.com or write to the Data Manager, Global Media, 30 Leicester Square London WC2H 7LA.

If you do not think we are handling your personal information adequately, you have the right to lodge a complaint with the Information Commissioner's Office. Further information, including contact details, are available at ico.org.uk.

12. Changes to Privacy Policy

This Privacy Policy will be amended from time to time if we make any important changes in the way that we collect, store and use personal data. We will prominently post these changes to this Policy.