

Privacy Notice



Job Applicants

What does this notice cover?

This Privacy Notice applies to the processing of personal data, which means information about an identifiable individual ("you") that PEI Media Limited ("PEI" or "we" or "our") processes when you apply for a position with PEI.

It also describes your data protection rights, including a right to object to some of the processing which PEI carries out. More information about your rights, and how to exercise them, is set out in the "What are your choices and rights?" section below.

PEI may also provide you with additional information when we collect personal data, where we feel it would be helpful to provide relevant and timely information.

What information do we collect?

We obtain your personal data because you have submitted an application for a position with PEI (either directly or through a recruiter). This personal data includes:

- Data you provide to us: PEI collects and stores any data you provide to us through your application, including:
 - Your name and contact details.
 - Your application materials (CV, cover letter, previous work experience, education and transcripts, and our notes from any interviews with you).
 - Your desired salary, type of employment sought and data available.
 - Your identification documents (passport number, government identification numbers where permitted, and immigration status).
 - Any other data you submit to us, including the name of the employer referring you and correspondences you may have with us during the application process.
- Data from other sources: PEI obtains data about you from other sources, including recruiters, employment research firms, identity verification services, the references you provide to us, websites and other publicly accessible data on the Internet. We will also receive data you submit to us through third-party websites.
- Information we collect automatically: When you make an application through PEI's online portal (available at: [<https://pei-media.workable.com/>]), PEI will collect information sent to us by your computer, mobile phone or other access device. For example, this includes the pages you access, your computer IP address, device identifiers, the type of operating system you are using, your location, mobile network information, standard web log data and other information, your browser type and traffic to and from our site.

Please ensure you have the consent of the PEI employee or any other referee whose details you provide alongside your application for us to use their personal data as outlined in this Notice.

Verification and staff checks

For some positions, it will be necessary for us to verify the details you have supplied (for example, in relation to your identity, academic credentials or your employment history) and/or carry out pre-employment checks (for example, in relation to previous criminal convictions or financial standing).

The level of required checks will vary by position and will usually be conducted at as late a stage as is practicable in the recruitment process and often only after you have been selected for the position. If your application is successful, we will provide further information about the checks involved and will obtain any necessary consent prior to completing such checks.

How do we use this information and what is the legal basis for its use?

PEI collects, uses and stores your personal data for the following purposes:

- Where this is necessary for PEI to review and assess your application for employment:
 - This includes assessing your skills and interest in career opportunities at PEI, processing your application, analysing your qualifications, verifying your identity and eligibility for employment, and communicating with you about your application to respond to your enquiries and schedule interviews.

Privacy Notice



Job Applicants

- Where necessary to comply with a legal obligation:
 - Disclosures to law enforcement agencies or in connection with legal claims, or regulatory purposes (including disclosure of such information in connection with legal process or litigation).
- Where necessary for PEI's legitimate interests, as listed below, and where these interests are not overridden by your data protection rights:
 - Protecting PEI's legal rights. This includes, but is not limited to, use in connection with legal claims, compliance, regulatory, auditing, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation) and other ethics and compliance reporting requirements.
- Where you have given your consent:
 - In case of unsuccessful application, we may ask for your consent to keep you informed about future job opportunities at PEI. Where we do process data based on consent, your consent can be withdrawn at any time.

How do we justify our legitimate interests?

PEI has carried out balancing tests for all the data processing it carries out on the basis of its legitimate interests, which we have described above. You can obtain information on our balancing tests by contacting us on the details below.

Where we require personal data to comply with legal or contractual obligations, then provision of such data is mandatory: if such data is not provided, then we will not be able to manage the employment relationship, or to meet obligations placed on us. In all other cases, provision of requested personal data is optional.

Who will we share this data with?

Your personal data will be processed in or accessed from jurisdictions outside the European Economic Area ("EEA") by us and by the third parties with whom we share your personal data.

Your personal data will be transfers to following non-EEA countries:

- The United States of America
- Hong-Kong

We will share your personal data with PEI Media Inc. (USA) and PEI Media (Hong-Kong) to administer and manage group functions, including to make systems available to our employees or to refer you for other open positions.

Your personal data will also be shared with companies providing services under contract to PEI, such as our HR provider, recruiters, employment research firms, identity verification service providers.

Personal data will also be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the protection of PEI's legitimate interests in compliance with applicable laws.

In the event that PEI is sold or integrated with another business (in part or whole), your details may be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business/business unit.

When we transfer your data within PEI entities, we use an intra-company agreement containing European Commission-approved standard contractual clauses. When we transfer your data to organisations outside PEI entities we use European Commission-approved standard contractual clauses to safeguard the transfer. When we transfer personal data to a third party that has implemented Binding Corporate Rules or which uses the EU-U.S. Privacy Shield, we may rely on one of those mechanisms to safeguard the transfer.

For further information, including to obtain a copy of the documents used to protect your personal data, please contact us using the details described below.

What rights to I have?

You may be entitled to **ask PEI for a copy** of your personal data, to **correct, delete** or **restrict** processing of it, and to **obtain the personal data you provide in a structured, machine readable format** and ask us to share (port) this personal data to other organisations. You may also have the right to object to processing in some circumstances.

Privacy Notice



Job Applicants

Where we have asked for your consent, you may **withdraw consent** at any time. If you ask to withdraw your consent to PEI processing your personal data, this will not affect any processing which has already taken place at that time. You can also ask us not to send or to carry out profiling for direct marketing, at any time.

These **rights may be limited** in some situations, for example if fulfilling your request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the GDPR and the UK Data Protection Act 2018. We will inform you of relevant exemptions we rely upon when responding to any request you make.

If you wish to exercise these rights, please contact us as set out below.

If you have unresolved concerns you have the **right to complain** to an EU data protection authority where you live, work or where you believe a breach may have occurred.

It is important that we maintain up to date records of key information on you. Please notify your manager of any changes in your personal circumstances as soon as they occur (e.g. change of address, marital status, emergency contacts). From time to time we may ask you to complete a new personal data form to ensure our records are up to date.

How long will you retain my information?

If your application is unsuccessful, we will retain your personal data only for twelve months following the closure of the recruitment campaign or as long as we need it for PEI's legitimate interest in accordance with applicable law, unless you give us permission to hold your records on file for other positions that become available.

If you accept employment with us, we will retain your personal data throughout your employment in accordance with a separate notice we provide to you upon your acceptance of employment.

Updates to this privacy notice

This Privacy Notice may be updated periodically. We will update the date at the top of this Privacy Notice accordingly. On some occasions, we may also actively advise you of specific data handling activities or significant changes to this Privacy Notice as required by applicable law.

Contact us

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your personal data, feel free to contact us on careers@peimedia.com or discuss this with your recruitment contact.

The data controller for your information is PEI Media Limited, registered in England and Wales under Company Number 04270060 who registered office address is: 100 Wood Street, London, England, EC2V 7AN.