

# CANDIDATE PRIVACY STATEMENT

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## 1. INTRODUCTION

### A How we operate

- **Accountability:** we are accountable for living up to these principles throughout our corporate family, including when working with our partners and suppliers. We have in place accountable privacy compliance measures and we monitor and enforce our compliance with these principles.
- **Fairness and lawfulness:** we comply with privacy laws and act with integrity and fairness. We will work with governments, regulators, policy makers and opinion formers for better and more meaningful privacy laws and standards.
- **Openness and Honesty:** we communicate clearly about actions we take that may impact privacy, we ensure our actions reflect our words, and we are open to feedback about our actions.
- **Choice and access:** we give people the ability to make simple and meaningful choices about their privacy and allow individuals, where appropriate, to access, update or delete their personal data.

### B How we manage and protect data

- **Responsible Data Management and limited disclosures:** we apply appropriate data management practices to govern the processing of personal data. We choose the partners who participate in processing of personal data carefully and we limit disclosures of personal data to such partners to what is described in our privacy notices or to what has been authorized by our customers.
- **Security safeguards:** we implement appropriate technical and organisational measures to protect personal data against unauthorized access, use, modification or loss.

### C How we design our products and services

- **Privacy by Design:** respect for privacy is a key component in the design, development and delivery of our products and services.

### D How we make decisions

- **Balance:** when we are required to balance the right to privacy against other obligations necessary to a free and secure society, we work to minimize privacy impacts.

## 2. WHO WE ARE

VodafoneZiggo includes several legal entities such as Vodafone Libertel B.V. and Ziggo B.V. We manage HR operations, including the processing of personal information about the employees and applicants to the VodafoneZiggo company to which you are applying.

## 3. DEFINITIONS

In this privacy policy:

"we/us" means each member of VodafoneZiggo such as Vodafone Libertel B.V., or Ziggo B.V., or Ziggo Services B.V., or Ziggo Services Employment B.V., or Liberty Global Content Netherlands B.V. depending on to which company you are applying;

"third party" means someone who is not you or us or a part of VodafoneZiggo Group Holding B.V.; and

"VodafoneZiggo" means VodafoneZiggo Group B.V. and any company or other organisation in which VodafoneZiggo Group B.V. owns more than 20% of the share capital.

## 4. THE BASICS

### 4.1 Personal information we collect about you

4.1.1 VodafoneZiggo will process your personal information based on:

1. **Consent you provide,** when you apply for a role at VodafoneZiggo you provide us with your personal information and agree that we can use this information to assess your application, progress your application through the recruitment process, make a decision about your suitability for the role and contact you throughout the recruitment process. Your consent can be withdrawn at any time.
2. **VodafoneZiggo's legitimate business interest,** for example, understanding your eligibility to work at VodafoneZiggo or meeting our targets for diversity and inclusion.
3. **Compliance with the law,** where certain information is necessary to satisfy a legal or regulatory requirement.

4.1.2 How we collect personal information about you

We collect personal information about you when you register a general interest or apply for a specific role at VodafoneZiggo. Some of the information we collect about you is required to make an assessment on your application to VodafoneZiggo and contact you as you progress through the recruitment process, for example your telephone number, email address, CV. If you do not provide this information then we will be unable to make an assessment of your application or contact you to invite you to interview, or make you an offer. We may collect information about you from the public internet where you have made

this information publicly available, for example, we may find your profile on LinkedIn and contact you about suitable roles.

Please note: **the Recruitment Screening Policy** is applicable for specific roles. We will inform you about this policy during the application process.

4.1.3 The types of information we may collect about you are, for example:

- 1) **Personal details**, such as name, personal email address, current address, telephone number;
- 2) **Recruitment information**, such as application form (website and paper), CV, resumes, interview notes of successful candidates, interview notes of unsuccessful candidates, video interviews, references from previous employer, psychometric test results;
- 3) **Internal candidate information**, such as references given by VodafoneZiggo, interview notes, internal transfer or promotion, succession planning documents;
- 4) **Identification information**, such as proof of identity;
- 5) **Authentication information**, user name and password for our recruitment portal, if applicable;
- 6) **Cookies**, such as performance and functionality cookies.

We may also process sensitive personal information about you – but only where this is strictly necessary to assess your suitability for the role you have applied for. For example:

- a) We may collect records of criminal convictions or right to work in the country you are applying to in order to perform security background checks where it is required by local law. For example we may ask you to submit a certificate of conduct (Verklaring Omtrent het Gedrag). This is a document by which the Dutch State Secretary for Justice and Security declares that the applicant did not commit any criminal offences that are relevant to the performance of his or her duties;
- b) We may collect information such as your age, gender or nationality to evaluate who applies for roles at VodafoneZiggo in order to meet our targets for diversity and inclusion – but only where you provide this information voluntarily and provide consent for us to process this information. You can withdraw your consent at any time;
- c) We may collect financial information in order to do financial probity checks for certain high risk roles.

## 4.2 How we use information about you

We may process the personal information that we collect about you for the following purposes:

- **Recruiting people into jobs**, the information you provide to us will be shared with the VodafoneZiggo company you are applying to in order to assess and progress your job application and to make any verifications required by local law. If you apply for more than one vacancy, your information will be shared with each VodafoneZiggo company where you have applied.
- **Resourcing for jobs**, if you register a general interest in pursuing a career with VodafoneZiggo, the information that you provide will be retained by us and searched by people who are employed by VodafoneZiggo to help us fill future vacancies. If you apply for a specific vacancy and you are unsuccessful, the information you provide to us will be retained so that we can consider you for future suitable vacancies – but only where we have collected your consent to do so.
- **Creating an employee record**, if your job application is successful, the information you give during the application process will form part of your employee record and will be used to administer your employment and manage your career at VodafoneZiggo.
- **Analytics**, in certain circumstances we may use the information you provide in your application to assess your suitability for a role. We may also use the information you provide to report on our diversity targets – you will not be identifiable from these reports.
- **Screening**, in certain circumstances we will make an automatic decision on the suitability of your application based on certain criteria. For example, graduates must be proficient in English and have completed a university degree to be considered – we will bring this to your attention wherever we collect information to make an automatic decision about you.

## 4.3 Who we share information about you with

We may share personal information about you with:

- Other companies in the VodafoneZiggo Group, which will process your personal information solely and only, for the above purposes;
- Third parties who help us assess the suitability of candidates. Where we use third parties, VodafoneZiggo ensures that they meet the same privacy and security standards as VodafoneZiggo;
- Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law;

- A third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement.

#### 4.4 Where we process information about you

In doing the above, we may need to transfer personal information about you to a VodafoneZiggo Group company or third parties located (or whose servers may be located) in countries outside of the European Economic Area (EEA). If we send personal information about you to a country that is not in the EEA, we will make sure that your information is properly protected. If you would like to find out more about the ways we comply with our legal obligations in relation to international data transfers, contact our HR Recruitment department. The contact details are available under section 7 'How to contact us'.

#### 4.5 How long we keep information about you

We will keep your information maximum four weeks after the end of the application procedure. If we aren't able to offer you a role, we may keep your information for a maximum of one year after the end of the application procedure but only where we have collected your consent to do so – you can withdraw your consent at any time in your candidate profile.

### 5. YOUR RIGHTS

Please send an email to [recruitment.nl@vodafone.com](mailto:recruitment.nl@vodafone.com) if you want to invoke one of the following rights:

- a) **Right to correct or update information:** you have the right to have information we keep about you corrected if it is not accurate. If the information we keep about you needs updating, or you think it may be inaccurate, you can update your information in your candidate profile or contact our HR recruitment department at any time to update this.
- b) **Right to access:** Want a copy of the personal information we hold on you? You can apply for a copy of your personal information.
- c) **Right to object:** you have the right, in certain circumstances, to object to VodafoneZiggo processing your personal information. If you wish to raise an objection.
- d) **Right to deletion:** in certain circumstances you have the right to request that we erase the personal information we hold about you. If you wish to request for your information to be deleted.
- e) **Right to restrict use of your data:** if you feel data we hold about you is inaccurate or believe

we shouldn't be processing your data, you may have the right to ask us to restrict processing that information.

- f) **Right to data portability:** in certain circumstances you will have the right to take the data you have provided to us with you. You can apply for a copy of your personal information.

### 6. CHANGES TO THIS PRIVACY STATEMENT

This privacy policy gets updated from time to time, so we'd encourage you to check it regularly on our recruitment portal. If we make a major change, we'll post this on the recruitment portal you will use to make your application.

### 7. HOW TO CONTACT US

If you have any further questions about this privacy policy or how we process your information, please contact our HR Recruitment Department, email: [recruitment.nl@vodafone.com](mailto:recruitment.nl@vodafone.com)

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