

Clear Channel Europe

# Commercial Operational Activities Privacy Notice

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## Operational Activities

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## Scope of this Privacy Notice

Clear Channel provide out of home (OOH) advertising services, including digital OOH advertising. Clear Channel customers can advertise through different OOH media provided by Clear Channel, including street furniture such as bus shelters and phone kiosks; billboards including digital towers and through digital panels predominately located in malls, entertainment venues and transport hubs.

Individuals whose personal data is processed have a right to be informed about the collection and use of their personal data. This is a key transparency requirement under data protection legislation.

This Privacy Notice applies to the processing of personal data in Clear Channel to carry out its business or operational activities, including sales, marketing and business relationship management, including personal data collected through the use of our websites and apps. This Privacy Notices applies to

- individuals whose personal data is processed by Clear Channel as they are individuals who work for or on behalf of our business partners which include
  - Clear Channel business customers,
  - Clear Chanel suppliers or vendors
  - Other Clear Channel business partners including investors and shareholders.
- individuals who access our website at <https://www.clearchanneleurope.com/>, <https://www.clearchannel.co.uk/> or other Clear Channel websites or platforms under the responsibility and control of a Clear Channel affiliate or subsidiary which is part of the Clear Channel Europe division.

Clear Channel process Personal Data for other purposes where different Privacy Notices will apply. If Clear Channel use personal data for any purposes not set out in this Privacy Notice, individuals will be informed when personal data is collected. For information about how Clear Channel process personal data when providing OOH advertising services, the [Commercial business activities privacy notice](#) applies.

If you have a question or wish to find out more about Clear Channel products and services generally this can be found on our website <https://www.clearchannel.co.uk/> and <https://www.clearchanneleurope.com/>

## Who are Clear Channel and how can you contact us?

When we refer to Clear Channel in this Privacy Notice, we mean the various affiliated and subsidiary companies of Clear Channel International Limited (trading as Clear Channel Europe) whose registered office is 33 Golden Square, London W1F 9JT, United Kingdom. Clear Channel Europe is a group of affiliated companies and a division of Clear Channel Outdoor Holdings Inc (CCOH) which is listed on the New York Stock Exchange.

Each of the Clear Channel companies in the Clear Chanel Europe division is an independent data controller for personal data processed to carry out its business or operational activities, including sales, marketing and business relationship management. For more information on Clear Channel Europe and the different affiliated and subsidiary companies in the Clear Channel Europe division can be found <https://www.clearchanneleurope.com/advertising#our-markets>

For any questions about how companies in the Clear Channel Europe division process personal data or any queries about information in this Privacy Notice you can contact our Data Protection Officer (DPO) at [mydata@clearchannelint.com](mailto:mydata@clearchannelint.com)

## What data do Clear Channel process and where do we get it from?

Clear Channel process personal data for business and operational purposes to provide OOH advertising services. This personal data includes information that is provided by Clear Channel business partners and by individuals directly and to facilitate the provision of Clear Channel services, through the completion of online forms, when individuals sign up to events and personal data that is collected by Clear Channel websites.

The data collected from individuals and Clear Channel business partners or third parties acting on business partners behalf may include some or all of the following:

- Name and job title
- Company or organisation
- Contact information including email address and telephone number
- Demographic information such as postcode, preferences and interests
- Other information relevant to client surveys or similar research
- Images collected using CCTV at Clear Channel managed facilities
- Information required to organise and accommodate individual requirements at events and webinars, which may include dietary, accessibility and accommodation requirements.
- Information pertinent to fulfilling Clear Channel services to our business partners
- Any other information that individuals voluntarily choose to provide.

In each case the data collection will be where permissible and in accordance with applicable law

### Information collected automatically

Some data collected through websites is collected automatically. When individuals visit a Clear Channel website or app certain personal data may be collected automatically from your device. this may include information like IP address, device type, unique device identification number, browser type, broad geographic location, (e.g., country or city level location) and other technical information. Clear Channel may also collect information about how your device has interacted with our websites including the pages accessed and links clicked.

## Why do Clear Channel process personal data?

Clear Channel process data for operational and business purposes to support and make OOH advertising services it provides as effective as possible. This will include using information provided

- To provide and improve customer support including for sales and marketing, business development, strategy and public relations purposes.
- For internal training purposes, we may use personal data to ensure that we have the knowledge and expertise to ensure that we provide the best possible experience when you interact with us
- For reporting and analytical purposes to enable us to improve our products and services and provide appropriate levels of support to our customers;
- To manage the security of our sites, networks and systems and to operate our business,
- For marketing purposes, any communications we send to you will include options to unsubscribe from receiving further marketing materials;
- To plan and run Clear Channel events and webinars
- Images collected using CCTV at Clear Channel managed facilities may be collected for security and crime prevention purposes or for the legitimate interests of Clear Channel or third parties.

- To maintain our records and other administrative purposes, including record keeping and general administrative purposes, including for business transactions (including M&A), to include information sharing with potential transactional partners or other third parties in connection with the consideration, negotiation or completion of a transaction in which Clear Channel are acquired by or merged with another company or there is a sale, liquidation or transfer all or a portion of assets including any bankruptcy or corporate reorganisation.
- To comply with legal obligations, to respond to legal processes or requests for information from government authorities or other third parties. Compliance with legal obligations includes processing personal data for finance related activities, legal, privacy and compliance activities including audit and corporate governance processes and activities.

## What is the legal basis for processing Personal Data?

Data Protection law means that every organisation must have a lawful ground or reason for processing any personal data about an individual.

### Consent

Where Clear Channel collect information from you such as when we use non-essential cookies or technology like cookies and/or collect information about the device you use to access our website, Clear Channel ask for consent. Sometimes third parties who carry out these activities on our behalf. Further information about the cookies is available in our Cookie Notice.

Clear Channel may also rely on consent for the administration of prize draws, surveys and other promotional activities.

### Legitimate Interest

Most of the Clear Channel business and operational purposes process personal data under a lawful ground called “legitimate interest”. Personal Data can be used on the basis of legitimate interests where the benefits of doing it are not outweighed by the interests or fundamental rights or freedoms of individuals. Clear Channel rely on it for the following purposes where there are benefits to Clear Channel:

- To provide and improve customer support including for sales and marketing, business development, strategy and public relations purposes.
- For internal training purposes, we may use personal data to ensure that we have the knowledge and expertise to ensure that we provide the best possible experience when you interact with us
- For reporting and analytical purposes and product development to enable us to improve our products and services and provide appropriate levels of support to our customers.
- To manage the security of our sites, networks and systems and to operate our business,
- For marketing purposes, to send marketing communications via various platforms that include social media networks including but not limited to LinkedIn and X (formerly known as Twitter), search engines including but not limited to Google and Bing, as well as email marketing activities.
- To process images captured using CCTV at Clear Channel managed facilities for security and crime prevention purposes and other legitimate business activities.
- For digital advertising with partners such as Google and Facebook for affiliate marketing and to create marketing content and perform lead scoring activities and refine our marketing strategies;
- To personalise experiences on websites and apps so that services can be tailored to individuals.

- To maintain our records and other administrative purposes, including record keeping and general administrative purposes, including for business transactions (including M&A), to include information sharing with potential transactional partners or other third parties in connection with the consideration, negotiation or completion of a transaction in which Clear Channel are acquired by or merged with another company or there is a sale, liquidation or transfer all or a portion of assets including any bankruptcy or corporate reorganisation.
- To resolve complaints or disputes
- To improve data accuracy and completeness.
- To protect the rights and interests of Clear Channel, our employees and others as required and permitted by applicable law

When we process personal data under legitimate interest, we carry out an assessment to consider individuals rights under data protection laws. The assessment is part of a process to embed data protection by design and by default to understand the potential privacy risks and put in place mitigations in place to minimise the risks. A key objective is to assess how data is collected and ensure that only data necessary for the purpose is processed. All processing is subject to security controls to ensure that Personal Data is adequately protected.

### **Who do Clear Channel share Personal Data with and why?**

Personal data is shared with individuals and organisations who need to handle it so that Clear Channel can support its business and operational activities. Clear Channel take steps to allow access to personal data only to when required to perform identified tasks and duties and to third parties who have a legitimate purpose for accessing it. Where a third party is granted access to personal data appropriate measures are put in place to ensure that the security and confidentiality of the information is maintained.

It is shared with

- Clear Channel business partners so that Clear Channel services can be provided.
- Clear Channel group companies who may manage or support some parts of the services;
- Service providers, including suppliers, resellers, distributors and agents we have engaged to support our business who receive or have access Clear Channel systems and data as part of providing services. These Clear Channel group companies and service providers may be located overseas.

### **Transfer of personal data overseas**

Clear Channel Europe are a group of companies located mainly in the UK and European Economic Area and as such any personal data will usually remain within the UK or the European Economic Area. Clear Channel group companies and service providers who may support these services also operate elsewhere, in and outside the European Economic Area, so data may be accessed from and transferred to these locations as well. Where data is transferred overseas, we will ensure that any personal data is adequately protected. There are different ways that this can be achieved, for example where it is transferred to a country which has been approved by the European authorities as having adequate protection in place or by putting contracts in place that has been approved by the European commission with the recipient of the personal data that provides a suitable level of protection.

## How long do we keep your personal data for?

Clear Channel keep personal data for as long as there is a continuing need to do so and in accordance with the Clear Channel data retention and destruction policy. Data that is no longer required will be securely disposed of.

Information may be retained to comply with our legal obligations, resolve any disputes and enforce our rights. These reasons can vary and will depend on the type of data processed, so the amount of time we may keep personal data may vary.

## Your rights in relation to the personal data we hold

Data protection laws give individuals a number of rights in relation to personal data. These include

- Right of access – see what information we hold about you
- Right to rectification – correct any information you think is wrong
- Right to object – ask us to stop using your data
- Right to be informed – understand what happens to your personal data
- Right to restrict processing – change how your data is used
- Right of portability – move your data
- Rights in relation to automated decision making and profiling
- Right to erasure or right to be forgotten

Clear Channel will consider all data subjects requests individually and, on a case,-by-case basis. Not all the rights listed above apply to the data processed by Clear Channel for its business and operational activities.

To exercise any of these rights, or to find out if they apply or if you require further information on your rights or our use of your Personal Data, please contact us at [mydata@clearchannel.com](mailto:mydata@clearchannel.com).

## How do Clear Channel keep your personal data secure?

Clear Channel use a variety of the latest technologies and organisational measures to protect data from unauthorised access, destruction, use or disclosure.

Clear Channel have an information security framework based on internationally recognised standards of security. The cyber security measures protecting data include appropriate technical and organisational measures aligned to ISO 27k requirements and CIS controls. Clear Channel have a dedicated cyber security investigations team who safeguard Clear Channel key assets and systems. This team identify and effectively manage any security developments that may threaten Clear Channel people, processes or technology.

## Contacting our Data Protection Officer

If you have any questions, concerns or issues about the way we are handling your personal data or want to exercise any of your data subject rights (or find out if they apply) please contact our DPO by email at [mydata@clearchannelint.com](mailto:mydata@clearchannelint.com) .

If you would prefer to contact us by post, please address this to The Data Protection Officer c/o Clear Channel International Limited, 33 Golden Square, London W1F 9JT, United Kingdom

## Supervisory authority

Having contacted Clear Channel if you are still unhappy with any aspect of how we handle your personal data you have the legal right to lodge a complaint with the supervisory authority of the relevant Clear Channel entity that is the data controller for personal data processed to carry out its business, operational and group management activities, including recruitment activities. Each of the Clear Channel companies in the Clear Channel Europe division is an independent data controller for personal data processed to carry out its business or operational activities, including sales, marketing and business relationship management.

Information Commissioners Office (ICO) the supervisory authority that regulates handling of personal data in the UK is the supervisory authority for Clear Channel International Limited. You can contact them by going to their website at [www.ico.org.uk](http://www.ico.org.uk)

## Changes to this Privacy Notice

Clear Channel may update this Privacy Notice from time to time and ideally you should check it regularly for updates. Previous versions of Clear Channel privacy notices are available upon request.

Last updated – October 2023