



Clear Channel Europe

# Recruitment Activities Privacy Notice

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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 when individuals apply for a job or other role with Clear Channel and the rights that you have in connection with that information.

This Privacy Notices applies to applicants. The term “applicants” is used in this Privacy Notice to refer to anyone who applies for a job role, a placement scheme, or otherwise seeks to carry out work with or for Clear Channel (whether on a permanent or non-permanent basis).

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.

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.clearchanneleurope.com> and any other website of Clear Channel Europe subsidiary and affiliated companies.

## 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, operational and group management activities, including recruitment activities. 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/>

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 when applicants apply for a job or other role with Clear Channel. Information is collected from applicants directly; some information will be collected automatically when you visit the recruitment section of the applicable Clear Channel website or platform and as part of the application process information may be collected from other sources.

### Information collected from applicants.

The types of information collected and processed when you apply for a role with Clear Channel may include (but is not limited to) some or all of the following:

- Identification information and contact details including name, address, national identifiers such as national ID, passport, social security number)
- Employment history
- Background information – such as qualifications, education, details included in any CV or resume
- Details of nominated referees
- Details of immigration/visa status
- Criminal offence information
- Other information individuals voluntarily provide through the process including through assessment centres/exercises and interviews.

### Information collected automatically.

Individuals can visit the recruitment section the of the applicable Clear Channel website or platform and search for jobs without providing personal information. However, 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. For further information please see the privacy notice that applies to the use of the website.

### Information collected from other sources

Information may include (but is not limited to) some or all the following:

- References provided by referees
- Other background information provided by training or certification providers
- Criminal records data obtained through criminal records checks
- Information provided by background checking agencies and other external database holders (for example credit reference agencies etc)
- Information provided by recruitment or executive search agencies
- Information collected from publicly available sources, including any social media platforms and other information available online.

In each case where permissible and in accordance with applicable law.

### **Why do Clear Channel process personal data?**

Clear Channel process this data primarily for recruitment purposes to assess skills, qualifications and backgrounds for a particular role and to generally manage the hiring process and communicate with applicants about it.

If an applicant is accepted for a role at Clear Channel, the information collected during the recruitment process will form part of the individuals HR record and will be processed in accordance with the Clear Channel Employee Privacy Notice.

If an applicant is not successful information will be deleted in accordance with the Clear Channel data retention policy. At the request of the applicant, information may be retained for a longer period so that the applicant can be considered for other suitable openings in future.

## 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.

The legal basis for processing personal information as part of the recruitment process is:

### Legitimate Interest

Personal Data can be used based on 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 the ground of legitimate interest for the recruitment purposes

- to assess skills, qualifications and backgrounds for a particular role and to generally manage the hiring process and communicate with applicants about it.
- Where personal data has been made public by the applicant,
- For reporting and analytical purposes to enable us to improve our services and provide appropriate levels of support to our applicants;
- To manage the security of our sites, networks and systems and to operate our business,
- 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, applicants 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.

### Contractual obligations

Personal data may be processed to take steps prior to entering into an employment contract where applicants are considered for employment.

### Compliance with law

Information including personal data may be processed to comply with applicable immigration and or employment laws and regulations.

## 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 recruitment 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, operational and group management activities, including recruitment activities.

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