



WarnerMedia Employee Privacy Policy (the “Policy”)

Effective - April 2022

INTRODUCTION

Warner Media, LLC. and its broader group of affiliated companies (“**WarnerMedia**”, “**we**”, “**our**” or “**us**”) are committed to fair data protection practices, including when Processing information about our employees (whether permanent or fixed term), interns and apprentices (“**Staff**”). [You can learn more about WarnerMedia affiliated companies by visiting our controller and affiliate site \(https://www.warnermediaprivacy.com/policycenter/b2c/affiliateslist/\)](https://www.warnermediaprivacy.com/policycenter/b2c/affiliateslist/).

This Policy provides notice to Staff about WarnerMedia’s practices with respect to the use of information WarnerMedia may hold about Staff.

1. DEFINITIONS

Controllers are the WarnerMedia entities that decide the purpose and the manner in which any Processing of Personal Information will be carried out (a list of Controllers can be found [by visiting our controller and affiliate site \(https://www.warnermediaprivacy.com/policycenter/b2c/affiliateslist/\)](https://www.warnermediaprivacy.com/policycenter/b2c/affiliateslist/)). The WarnerMedia entity that employs you is always a Controller of your Personal Information. Depending on the particular Processing activity (as described below), there may be more than one Controller with respect to that particular Personal Information (for example, where your Personal Information is shared with a parent company for business planning purposes, this parent company may also be a Controller in respect of that Processing). If you have any questions about who is the Controller for your Personal Information, please contact us using the methods set out in section 7 below.

Personal Information means any data or information Processed by us that identifies, relates to, describes or is capable of being associated with, or may reasonably be linked, directly or indirectly, with an individual.

Processing, Process, Processed refers to any action that is performed by WarnerMedia on Personal Information, such as collecting, viewing, accessing, recording, organising, analysing, storing, modifying, using, disclosing or deleting such Personal Information and/or as otherwise defined by any applicable laws.

Sensitive Personal Information means Personal Information that requires a high degree of protection by law. In particular, under this Policy this includes all information identified as a special category of personal data under the General Data Protection Regulation (GDPR), and other applicable data protection laws, and/or regulations. Sensitive Personal Information may include Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data and biometric data Processed for the purpose of uniquely identifying an individual, data concerning health, sex life or sexual orientation, as well as Personal Information

relating to criminal convictions and offences or related security measures, and in certain jurisdictions where required under applicable law, passwords and financial information (such as bank account, or credit or debit card, or other payment instrument details).

2. PURPOSES AND LEGAL BASIS OF PERSONAL INFORMATION PROCESSING

To the extent permitted by law and where necessary, we Process Staff Personal Information for the following purposes:

- (i) To establish and perform any contract with you, to maintain, manage or terminate any contractual relationship and to enable you to perform any services for the purposes of your job or otherwise, or as necessary in connection with services or benefits you request from us, in particular:
 - Administration of payroll and benefits and absence, compensation and expense management;
 - Managing our personnel, for example, onboarding and exit management and performance;
 - Allowing you access to medical insurance, pension schemes and other benefits offered by WarnerMedia and other providers including management of employee transfers, travel and/or relocation (including immigration assistance). Some benefits may require you to provide Personal Information concerning family members, partners or next of kin, in which case you must inform them before providing the Personal Information to us and obtain their consent if this is required by applicable law;
 - Rights management and placement of credits, if applicable; and
 - Arranging professional travel (including hotel accommodation) and relevant insurance.
- (ii) To comply with a legal obligation including for:
 - Making deductions from payroll for tax and social security purposes and providing information to tax and social security authorities as required by law;
 - Managing statutory sick pay and maternity/paternity/parental pay;
 - Engaging in mandatory employee relations engagement activities;
 - Carrying out necessary checks on right to work; and
 - Carrying out or obtaining occupational health and safety and necessary medical assessments.
- (iii) For our legitimate interests, as listed below (where our interests are not overridden by your data protection rights), or where you have given your consent as required under applicable law in certain jurisdictions:
 - Developing our personnel – for example, training and leadership development, succession management, award recognition, social corporate responsibility activities, employee surveys and communications to employees;
 - Planning our business, including succession planning, reorganisation and restructuring, office location planning, business and HR reporting and statistical analysis of our workforce,

promotional planning, pitching, applications for awards and other professional recognition, collaborating or participating in industry initiatives, applying for entertainment industry incentives (if applicable), attending and organising professional or promotional events, any activities relating to disaster recovery, back-up and daily business continuity and recording/archiving any business operations and any documents including contracts, emails, productions or marketing creations;

- Developing, commissioning, producing, publishing, distributing, promoting and commercialising our productions, games and/or other audio-visual content, if applicable;
- Storing and archiving our productions, games and/or other audio-visual content, if applicable;
- Protecting our legitimate business interests and 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, or where requested by law enforcement or other relevant third parties) and Processing in connection with ethics and compliance policies such as the Standards of Business Conduct and related reporting tools;
- Managing the performance and security of our equipment, facilities, intellectual property and electronic platforms in accordance with our policies. This includes administering access rights, management and control of building and area access including access logs, monitoring compliance with information security and other WarnerMedia policies, operating CCTV and other recording software and systems, and where permitted by local law and in accordance with relevant policies, using Personal Information for investigations and disciplinary actions;
- Ensuring the safety and protection of our Staff, non-employees and visitors;
- Providing communication services such as email, telephone and internet access;
- Carrying out communications and engagement activities, including sending internal communications to Staff (including communicating with, and alerting, employees during a crisis), Staff discounts, loyalty or affinity programs, and access to promotions, competitions, and company products, managing participation in events and handling emergency contact information;
- Publishing internal directories, charts and providing other internal communications tools. This includes the information you provide for any internal company profile (including your photo, if applicable and permitted under applicable law);
- As applicable, analysing and monitoring the diversity of the workforce in accordance with applicable laws. This includes, for example, compliance with equal opportunity employment law;
- Obtaining insurance and processing claims;
- Conducting employee surveys and engaging third parties to conduct employee surveys; and

- Handling your Personal Information in connection with recruitment or onboarding activities you engage in, including CV reviews, interviews, conflicts of interest, (where permitted by law) relevant vetting and background checks and applying for visa/work permits, if applicable.

(iv) Where you have given your consent such as:

- Providing references to third parties where you have requested;
- Carrying out certain vetting and background checks where your consent is required by law; and
- Processing as described in any other consent we seek from you.

Where any of these purposes involves the Processing of Sensitive Personal Information, this will only be done where this is permitted by applicable law, for example because you have given your explicit and freely given consent (which may be in writing), because you have manifestly made the Personal Information public, because we are required to carry out the Processing due to applicable employment or social security laws, or because there is a substantial public interest in this Processing.

Where this Processing involves monitoring activities, any such monitoring, interception or investigation activities would be conducted in accordance with governance arrangements to ensure compliance with applicable laws (where applicable laws permit such monitoring activities) and internal policies. Where permitted, some of these may be covert or specifically targeted in relation to particular Staff. This would only happen in exceptional circumstances and usually where there is concern about the individual's conduct or a suspicion of criminal activity. Any Personal Information gathered may be used to establish the facts and as evidence in any potential/subsequent legal, criminal or disciplinary proceeding/actions. Monitoring may also be used for business continuity purposes, including where Staff are absent or have left the business.

3. TYPE AND SOURCES OF PERSONAL INFORMATION COLLECTED

We will generally collect Personal Information directly from Staff and will collect the Personal Information requested from you or that you otherwise provide, as part of your employment, including contact details, such as address, telephone number and email address, and financial information, such as bank account details. We may also create Personal Information as part of your employment, such as records of your performance, skills and experience, salary information, and absence records. However, to the extent permitted by law and where necessary to achieve the purposes of Processing, WarnerMedia may collect Personal Information from other sources (where permitted by applicable laws), including but not limited to:

- Government organisations, health providers and benefits providers, for example information needed to help identify which benefits have been sought or are needed to ensure compliance with taxation laws;
- Business partners and service providers such as, companies providing training and any other related activities, companies providing background checks, phone companies and taxi

companies. This can include details of your training, details included in any background or vetting check and details of your use of our service providers;

- Staff supervisors and colleagues or nominated referees; and
- Publicly available information that may be posted on the internet, in newspapers, etc. where used in connection with investigations or vetting checks, or which is otherwise brought to our attention.

4. DATA RETENTION

WarnerMedia holds Personal Information only for as long as is necessary for the purposes for which the Personal Information is Processed. This means that the retention periods will vary according to the type of Personal Information and the reason that we have this Personal Information.

Generally, we will hold your Personal Information for the course of your employment relationship with us (except where applicable law only allows for a shorter period) and for a certain period after termination of employment. We have a detailed internal retention policy that sets out varying retention periods for different categories of Personal Information, depending on our legal obligations and whether there is a commercial need to retain the Personal Information. After a retention period has lapsed, the Personal Information is securely deleted, unless, where permitted under applicable law, it is necessary for the establishment, exercise or defence of legal claims. For further information regarding applicable retention periods, you should contact your Controller using the contact methods set out below.

5. TRANSFERRING, SHARING, AND DISCLOSING PERSONAL INFORMATION

WarnerMedia may share Staff Personal Information with third parties or within the WarnerMedia group of companies that are located around the world and particularly in the United States where WarnerMedia, LLC is based. [You can learn more about WarnerMedia companies by visiting our controller and affiliate site \(https://www.warnermediaprivacy.com/policycenter/b2c/affiliateslist/\)](https://www.warnermediaprivacy.com/policycenter/b2c/affiliateslist/). Whenever we transfer Personal Information outside of the United Kingdom, Switzerland, European Economic Area (EEA), Mainland China or any country that restricts data transfers, we ensure that appropriate safeguards are in place by using appropriate data transfer mechanisms such as an adequacy decision adopted by the applicable jurisdiction such as the EU Commission using approved Standard Contractual Clauses, international data transfer certifications, or codes of conduct, or Binding Corporate Rules.

Staff may obtain further information about the transfer mechanism we rely on when transferring their Personal Information outside the United Kingdom, Switzerland, the EEA, or other jurisdictions that may require a transfer mechanism by contacting us at WMPrivacy@warnermedia.com.

- ***Data sharing within the WarnerMedia family of companies***

All WarnerMedia entities are part of the WarnerMedia group of companies operating internationally. All members of the WarnerMedia group support and interact with each other to run their businesses

and to set group-wide strategy. Certain Personal Information can be accessed by any of the WarnerMedia group of companies on a worldwide basis (such as corporate directory information) where there is a legal basis to do so. Other Personal Information will be Processed by your line managers, employees within your local HR team and the Legal, Compliance, Financial and HR shared services teams where relevant, necessary and legally permitted. Some of these employees and IT systems may be located outside of your country, including in the US. All access is subject to data security measures and internal controls established under applicable WarnerMedia policies and is restricted to what is relevant and proportionate for the relevant legitimate purpose.

Certain Personal Information is shared among WarnerMedia group of companies for group reporting, legal, management and regulatory purposes, including name, employee and ID numbers, birth date, gender, role information and salary information. [You can learn more about WarnerMedia companies by visiting our controller and affiliate site \(https://www.warnermediaprivacy.com/policycenter/b2c/affiliateslist/\)](https://www.warnermediaprivacy.com/policycenter/b2c/affiliateslist/).

- ***Change of Control***

In the event we go through a business transition such as a merger, acquisition, bankruptcy, reorganization, or sale of all or a portion of our assets, or a diligence process in connection with a potential business transaction, the information we collect and maintain may be disclosed, sold, or transferred as part of that transaction. If such transfer is subject to additional restrictions under applicable laws, we will comply with such restrictions.

- ***Data sharing with third parties***

WarnerMedia needs to engage with third parties to run every aspect of its business. Where necessary for the Processing activities set out in section 2 above, WarnerMedia shares Personal Information with:

- (i) ***Third party service providers*** which help WarnerMedia carry out its business activities, for example, IT providers (resources and support), training providers, security companies, benefits providers, payroll and other HR related service providers, travel/events/communication companies, hotel and transport companies etc. as well as any advisers (e.g., lawyers, accountants, auditors, etc.) and insurance companies;
- (ii) ***Business partners*** such as event partners, co-producers, broadcasters, licensees and distributors and awards organisers; and
- (iii) ***Other relevant third parties*** such as journalists, professional organisations, industry bodies, public/governmental agencies or authorities, law enforcement, emergency contacts and services or potential purchasers of WarnerMedia or parts of its business and the advisors of those potential purchasers.

6. STAFF RIGHTS AND MANDATORY PROCESSING

As provided for by applicable law, Staff may have the right to **access** their Personal Information; to **correct (or update), delete** or **restrict** (stop any active) Processing of their Personal Information; and

to obtain the Personal Information they provide to us in a structured, commonly used and machine-readable format and to ask us to share (**portability**) this Personal Information to another controller.

In addition, Staff may have the right to **object to the Processing** of their Personal Information in some circumstances (in particular, where we don't have to Process the Personal Information to meet a contractual or other legal requirement). Where WarnerMedia has asked for your consent, you have the right to **withdraw your consent** at any time by contacting your Controller using the contact methods set out below.

As provided for by applicable law, Staff may also have the right **not to be subject to certain wholly automated decisions**.

The rights set out above are not always applicable or may be limited under the GDPR or applicable law. Under certain circumstances, WarnerMedia may not action a request for these reasons. WarnerMedia will inform you of relevant exemptions we rely upon when responding to any request you make.

If you are not happy with how WarnerMedia has responded to your request or how we Processes your Personal Information, you also have the right to complain to the data protection authority where you live, work or where you believe a breach has occurred and the right to bring an action before courts.

We will tell you where Personal Information collection is mandatory – this will include Personal Information that is necessary to perform our contract with you, information needed to check your right to work and to manage your performance. As permitted under applicable law, failure to provide information may be a breach of your agreement with us and may have disciplinary consequences. Staff are also required to report any changes to Personal Information that is mandatory (in particular, your bank account number and any changes in your contact details). Where Personal Information is optionally provided, for example details of an emergency contact, there may be some adverse consequences if you refuse to provide this.

7. CONTACTING YOUR CONTROLLER

To exercise any of the rights listed in section 6 above, or if you have any queries or concerns about the way that WarnerMedia Processes your Personal Information (or any questions about this Policy), or to contact your Controller or your Controller's DPO, please email WMPrivacy@warnermedia.com. You can also contact your local HR team with your queries or concerns, but use of the email address above will better direct your query to our Privacy team.

The Data Protection Officer:

Susan Rohol
4000 Warner Blvd.
Burbank, CA 91522
USA

8. MODIFICATIONS TO THE POLICY

WarnerMedia reserves the right to modify this Policy at any time. To the extent required by law, changes to this Policy will be communicated to Staff and, where applicable, any additional consent will be requested.