

# OBS/OCS RECRUITING PRIVACY POLICY

This OBS/OCS Recruiting Privacy Policy (the “Privacy Policy”), as updated from time to time, explains what information about you is collected and how it is processed when you apply for a job within OBS/OCS, you use our recruitment platform, or if you send us an application to work or collaborate with us or your curriculum by any available means.

By applying to one of our position vacancies, you agree to your information being collected and processed in accordance with this Privacy Policy.

SUMMARY	
DATA CONTROLLER(S)	Olympic Broadcasting Services, S.L.U. (“OBS”) and Olympic Channel Services, S.L.U. (“OCS”). We will refer to them individually as the Data Controller of your personal data, being the relevant Data Controller, the company publishing the job vacancy that you are applying to.
PURPOSES	OBS/OCS as Data Controllers will collect and process your Personal Data for the general recruiting purposes, including without limitation, the evaluation of your application and obtaining references and referrals or the management of OBS/OCS Integrity Line, as further described in section 3 of this Privacy Policy.
RECIPIENTS	Third parties, including service providers (including IT and consulting companies, technology, recruiting and other relevant services providers that provide services to OBS/OCS).
LEGITIMATION	Performance of a contract, compliance with legal obligations (and public interest when it refers to the management of OBS/OCS Integrity Line), legitimate interest and consent.
RIGHTS	You have the right to access, rectify and erase your data, and other additional rights detailed in this Privacy Policy.
ADDITIONAL INFORMATION	You may consult the additional information for more details on the processing of your Personal Data below.

1. The Data Controller of your Personal Data.
  - 1.1. The Data Controller of the Personal Data that will be collected and used in connection with your job application is one of the companies indicated below, depending on the

position you are applying to as indicated in the particular description of the available vacancy/ position:

- Olympic Broadcasting Services, S.L.U. (“OBS”) with company registration number B83747691 and a registered address in Calle Torrelaguna 75, 28027 Madrid.
- Olympic Channel Services, S.L.U. (“OCS”) with company registration number B87320867 and a registered address in Calle Torrelaguna 75, 28027 Madrid.

**When we refer to “we”, “our” or “us”, we are referring to OBS/OCS acting as data controllers, and when we refer to “you” or “your” we refer to you as the individual from whom we process Personal Data.**

- 1.2. OBS and OCS have appointed a Data Protection Officer that can be contacted at the email address [dpo@obs.tv](mailto:dpo@obs.tv) or at the postal address Calle Torrelaguna 75, 28027, Madrid.
- 1.3. OBS and OCS have implemented the appropriate technical and organisational measures to prevent the alteration, loss, misuse, unauthorized processing and access, or theft of your personal data, taking into consideration the available technology.
- 1.4. From time to time, we may change this Privacy Policy to accommodate new technologies, industry practices, regulatory requirements, or for other purposes. We will inform you if these changes are material and, where required by applicable law, we will obtain your consent. We will inform you by sending an email, by posting notice of such changes on our websites, or by other means as required in compliance with the applicable laws.

## 2. Legal Grounds for Processing Personal Data.

- 2.1. Under the applicable data protection laws, there are various legal bases or grounds on which we can rely when processing your Personal Data. In some contexts, more than one ground applies. The grounds for processing are as follows:
  - Performance of a contract: data processing is necessary for the performance of a contract with you or to take steps at your request to enter a contract. These covers carrying out our contractual duties and exercising our contractual rights.
  - Legal Obligation: data processing is necessary to comply with our legal obligations. The processing is necessary for ensuring we perform our legal and regulatory obligations. For example, providing a safe place of work or complying with health and safety laws.
  - Legitimate Interest: **data processing is necessary for our or a third party’s** prevailing legitimate interest. We or a third party have legitimate interests in carrying on, managing, and administering our respective businesses effectively and properly and in connection with those interests processing your Personal Data. Where we rely on legitimate interests, we consider:
    - a) what our legitimate interest is – these are set out in the table below;
    - b) whether the processing is necessary to achieve it (i.e. whether it is

proportionate); and

- c) **whether it can be balanced against individuals’ interests, rights, and freedoms.**

Where this test is not met, we do not rely on legitimate interest. This Privacy Policy serves as a record of our legitimate interest assessment. Note that you can generally opt-out from processing based on our legitimate interests (or exercise your right to object to such processing on grounds relating to your situation at any time). Please contact us at [dpo@obs.tv](mailto:dpo@obs.tv) if you have any questions about this test or you would like a summary or if you would like to object to such processing of personal data (e.g. opt- out).

- **Consent:** this is where you have given specific consent to processing your Personal Data. Where the legal ground is your express consent, we will only process your personal information in this way if you agree to us doing so. You have the right to withdraw your consent at any time by contacting us at the address indicated in this Privacy Policy; however please note that this does not affect the lawfulness of our processing of your personal information based on your express consent before such withdrawal.

2.2 The relevant legal bases that we rely upon for each type of data processing activity and Personal Data collected are specified in the next section 3.

### 3. The Information and Personal Data we collect, purposes and Legal Bases.

3.1. As part of the recruitment process, we will collect information from and about you which can be that (a) you provide us directly by means of your job application within the OBS/OCS recruitment platform or by other electronic means such as email or, indirectly, provided by a third party authorised to share information with us; and (b) we collect from third parties or public sources (e.g. recruitment agencies or social media profiles). We will also (c) collect information about other individuals when you provide information about them (note: such information is used solely to facilitate the communications requested or applying for a role). When we do this, we will identify you as the person making the referral/reference and you warrant that you have the appropriate consent to provide this information on his/her behalf in accordance with this Privacy Policy.

3.2. Candidates and potential candidates Personal Data will be processed for the following purposes:

Purpose		Personal Data processed	Legal basis
1	Recruitment evaluation: to evaluate your eligibility and suitability to apply to work for OBS/OCS for a particular role and/ or to be considered for	Information concerning your application and our assessment of it, including without limitation, your name, surname, education, CV, salary expectations, continent and	<ul style="list-style-type: none"> <li>• Performance of a Contract;</li> <li>• Legal obligation;</li> <li>• OBS/OCS prevailing legitimate interest to</li> </ul>



Purpose		Personal Data processed	Legal basis
	future positions at OBS/ OCS. OBS/OCS will also process certain data in such recruitment evaluation process for the purposes of implementation of diversity hiring policies and practices within OBS/OCS.	<p>city of residence, any relevant contracting conditions (such as notice period) types of work and type of contracting you are interested to be considered for, skills relevant to the job, your references, any checks we may make to verify information provided, other background checks, referrals, etc. CV, LinkedIn/other social platform public profile information and publicly observed data (such as activities on social networks, web searches and other online postings and consent), etc.</p> <p>Please note that this Privacy Policy does not cover the practices of these third parties and their use of your information by them is governed by their own privacy policies.</p> <p>We will also be requesting Date of Birth, Gender and Nationalities (some optional) as we build up toward our organizations goals of hiring diverse talent for positions within OBS/ OCS.</p>	<p>consult public information for a fair evaluation candidate, provided candidates can effectively opt-out.</p> <ul style="list-style-type: none"><li>• OBS/OCS prevailing legitimate interest to create a job pool to consider candidates for future positions for an efficient management of recruiting, if candidates do not object to such data processing activity.</li><li>• For diversity purposes, OBS/OCS prevailing legitimate interest in implementing the <b>companies'</b> Diversity and Inclusion Policy, in alignment with the IOC goals of diversity, always provided candidates do not object to such data processing activity.</li></ul>
2	Recruitment process management and pre-contractual steps: including managing paperwork to be able to work in Spain and generally facilitating the process to hire you if you are the successful candidate.	Information concerning your application and our assessment of it, including, without limitation, your full name, when you voluntarily provide family/lifestyle details, education, CV, salary expectations, DNI, NIE, Passport, Country and city of residence, Date of Birth and gender and any other relevant documentation required in the pre-contractual stages.	<ul style="list-style-type: none"><li>• Performance of a contract</li></ul>

Purpose		Personal Data processed	Legal basis
		For <b>freelancers'</b> position, OBS/OCS will occasionally when required request additional information such as TRC Certificate and/or confirmation of VAT registration as a Freelancer if you have not worked with us before.	
3	References: Consult with third parties, including companies where you have previously worked, for references of your performance.	Name, surname, former positions and companies, information about your performance in previous roles and projects. Before sharing their references details you confirm and warrant that you have informed them that you will be passing their contact details to OBS/OCS to be contacted.	• Consent.
4	Referrals: OBS/OCS may request you to refer to suitable candidates for open vacancies or receive referrals for current vacancies/ future roles and will process such details in accordance with this Privacy Policy.	We may also ask you to refer people to us that may be suitable for positions that you may know. When you provide such referrals information, you warrant that you have obtained their consent and that you have informed them that OBS/OCS then will be processing their personal data in accordance with this Privacy Policy.	• Consent
5	OBS/OCS Integrity Line management and the subsequent processing of any reports and relevant investigations in compliance with our legal obligations.	Contact information (name, surname, job title), investigation/report information and in certain cases special categories of personal data that you may voluntarily include as part of a complaint. As part of this activity, we may share some information with our external advisors, and, exceptionally with the IOC, under the specific requirements established.	• Legal obligation; • Public Interest.

3.3. Your Personal Data will not be used for automated decision making or profiling.

## 4. Recipients of your Personal Data.

OBS/OCS may share your Personal Data with the following recipients:

- Service providers (IT and telecommunications providers, agencies, recruiting and consulting companies and analogous suppliers) that OBS /OCS contracts, or may contact, that assist OBS/OCS in their day-to-day activities acting as data processors and with whom OBS/OCS have a data processing agreement in place.
- Public authorities and bodies, including Courts and Tribunals, when required by the applicable regulations or when necessary and/or appropriate for the defense of OBS/OCS legitimate rights (on the basis of its overriding interest in the defense of such rights).
- OBS/OCS affiliates and Olympic Stakeholders: Your Personal Data may be occasionally disclosed to the International Olympic Committee (**the “IOC”**), located in Switzerland, for administrative purposes and/or when the job you apply for is also in connection with IOC activities and to other OCS/OBS affiliates based on OBS/OCS legitimate interest. This disclosure also constitutes an international data transfer. Switzerland is a country with level of protection equivalent to the European Economic Area according to the Commission Decision of 26 July 2000 pursuant to Directive 95/46/EC of the European Parliament and of the Council, on the adequate protection of personal data provided in Switzerland.
- External advisors as required and relevant to manage OBS/OCS Integrity Line on the bases of OBS/OCS legitimate interest.

## 5. International Transfers

- 5.1. Your Personal Data may be shared to third parties on a cross border basis for the purposes of managing the business trips of the employee, manage Olympic Games operations where the Olympic host country is outside the EU/EEA and/or hiring adequate health insurances for employees when travelling abroad.
- 5.2. Such recipients may be located in various jurisdictions inside and outside of the European Economic Area (**“EEA”**), including in countries (such as the United States of America) which may not have a level of protection for Personal Data equivalent to the level of protection available in the EEA.
- 5.3. OBS/OCS shall take measures required by the applicable data protection laws to ensure that the Personal Data continue to benefit from an adequate level of protection, including without limitation, the formalisation of European model clauses as approved by the European Commission. In other occasions OBS/OCS will rely on the available derogations under art. 49 of GDPR, particularly contractual necessity (49.1(c) GDPR) as certain information will need to be transferred to other countries for lawful and appropriate reasons. OBS/OCS will provide further information on the specific cases by

complementary data protection notices as relevant. You can request a copy of any such safeguards in the address mentioned in this clause.

## 6. Personal Data storage and Data Retention

- 6.1. Your personal data shall be retained as well for the time required to fulfil the purposes and generally manage your job application.
- 6.2. We will retain your information only for the duration necessary for the purposes identified in this Privacy Policy or as required to meet our legal requirements and in no event for longer than two years. Once your personal data is no longer necessary for these purposes, data will be blocked. During the blocking period, your data will be only unblocked and processed again exclusively for the purpose of the exercise or the defence against administrative or legal claims. Once this period is over, your personal data will be erased.

## 7. Third **Party's Personal Data**

- 7.1. In the context of the preliminary contractual steps of your employment with OBS/OCS if you are a successful candidate, **you may provide third party's Personal Data** (i.e. relatives such as your next of kin or spouse) to fulfill any of the abovementioned purposes. In such cases, you guarantee that you have informed them of this data processing by OBS/OCS and obtained their authorisation to share such details with OBS/OCS in accordance with this Privacy Policy.

## 8. Your Data Protection Rights

- 8.1. You may exercise your rights of access, rectification, erasure, objection, restriction of processing and data portability in the cases and to the extent established by applicable law at any time. You also have the right to withdraw your consent at any time.
- 8.2. When we have relied in our legitimate interest for the data processing activity at hand, you have the right to object to such data processing following the same process established herein. We will then stop processing the data unless we can demonstrate a compelling legitimate ground that overrides your rights (e.g. exercising or defending a legal claim) or an exemption that applies.
- 8.3. To exercise your rights, you may write to Calle Torrelaguna 75, 28027 Madrid, or send an e-mail to our Data Protection Officer at [dpo@obs.tv](mailto:dpo@obs.tv). If you have any additional data **protection concerns that we can't address, you can also file a complaint before the Spanish Data Protection Agency** ([www.aepd.es](http://www.aepd.es)).