

China Unicom (Europe) Operations Limited

Privacy Notice – Employment and Work related

1 Introduction

This Privacy Notice ("**Notice**") applies to the data processing activities of China Unicom (Europe) Operations Limited, (the "**Company**", "**we**", or "**us**"), which is a controller of any of your personal information that it processes.

We, the Company, take the security and privacy of data seriously. We need to gather and use certain information or 'data' about you in order to perform our functions as your employer and to manage our relationship with you. In addition, we are also required to comply with our legal obligations under applicable privacy laws, including the European Union's General Data Protection Regulations ("**GDPR**") and local laws which implement it in the United Kingdom or the European Union Member State in which you are employed.

This Notice explains how the Company will hold and process your information. It also explains your rights as a Data Subject, and your obligations when obtaining, handling, processing or storing personal data in the course of working for, or on behalf of, the Company.

This Notice applies to all individuals (current and former) engaged by the Company, whether they be job applicants, employees, apprentices, consultants, independent contractors, contingent, temporary or contract workers, secondees, professional advisers and interns. For the purposes of this Notice, anyone who falls into the aforementioned categories is considered a "**Data Subject**".

This Notice should be read alongside your contract of employment (or contract for services), and any other notice which we may issue from time to time in relation to your data. However, this Notice does not form part of your contract for employment (or contract for services) and may be amended at any time by the Company.

The Company will hold the data we collect from you only for the length of time necessary for the purposes for which it is held; in accordance with our legislative requirements; and the Company's records retention policies and procedures. A copy of these policies can be found on the public drive, or can be obtained from the Data Protection Unit and HR team. We will only hold your data for as long as necessary for the purpose for which we collected it.

The Company is the "Controller" of your personal data. This means that the Company determines the purpose and means of processing your personal data in the context of the Company's activities.

If you are unsure about anything contained within this Notice, or if you notice any areas of data protection or security we can improve on, please contact Data Protection Unit and/or HR team.

2 Types of personal data that we collect

"**Personal Data**" means information which relates to a person who can be identified, directly or indirectly, from that data (a "Data Subject") on its own, or when taken together with other

information which is likely to come into our possession. This may also include special categories of personal data, which is processed to uniquely identify you.

This Notice applies to all Personal Data, whether it is stored electronically, or physically.

We will collect and use the following types of Personal Data about you:

- Identification data – such as your name, gender, photograph, date of birth, staff member IDs;
- Contact details – such as home and business address, telephone/email addresses, emergency contact details;
- Employment details – such as job title/position, office location, employment contract, performance and disciplinary records, grievance procedures, sickness/holiday records;
- Background information – such as academic/professional qualifications, education, CV/resumé, criminal records data (for vetting purposes, where permissible and in accordance with applicable law);
- National identifiers – such as national ID/passport, immigration/visa status, social security numbers (UK only);
- Spouse & dependents information, marital status;
- Financial information – such as banking details, tax information, withholdings, salary, benefits, expenses, company allowances, stock and equity grants;
- IT information – information required to provide access to company IT systems and networks such as IP addresses, log files and login information; and
- any other category of Personal Data which we notify you from time to time.

Sensitive personal information includes any information that reveals your racial or ethnic origin, religious, political or philosophical beliefs, genetic data, biometric data for the purposes of unique identification, trade union membership, or information about your health/sex life ("**Sensitive Personal Data**"). As a general rule, we try not to collect or process any Sensitive Personal Data (also known as special category personal data) about you, unless authorised by law or where necessary to comply with applicable laws.

However, in some circumstances, we may need to collect, or request on a voluntary disclosure basis, some Sensitive Personal Data for legitimate employment-related purposes or for the purpose of assisting you with obtaining the necessary national security clearance required for you to perform your duties or access our sites. For example, information about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws and for government reporting obligations;

3 Purposes for processing your Personal Data

Recruitment purposes

If you are applying for a role at the Company, then we collect and use this Personal Data primarily for recruitment purposes – in particular, to determine your qualifications for employment and to reach a hiring decision. This includes assessing your skills, qualifications and background for a particular role, verifying your information, carrying out reference checks or background checks (where applicable) and to generally manage the hiring process and communicate with you about it.

If you are accepted for a role at the Company, the information collected during the recruitment process will form part of your ongoing staff member record for background and security purposes.

If you are not successful, we may still keep your application to allow us to consider you for other suitable openings within the Company in the future.

Employment or work related purposes

Once you become a staff member at the Company, we collect and use this Personal Data for the purpose of managing our employment or working relationship with you – for example, your employment records and contract information (so we can manage our employment relationship with you), your bank account and salary details (so we can pay you), your benefits (for administration purposes) and details of your spouse and dependents (for emergency contact and benefits purposes).

We process our staff members' Personal Data through a human resources system ("**HR System**"), which is a tool that helps us to administer HR and staff member compensation and benefits. The Company may host these servers or utilize third-party servers, but in either case will be responsible for the security access of personal information on the HR System.

The Company directory

We maintain a directory of staff members which contain your professional contact details (such as your name, location, photo, job title and contact details). This information will be available to everyone in our corporate group to facilitate cooperation, communication and teamwork.

Other legitimate business purposes

We may also collect and use Personal Data when it is necessary for other legitimate purposes, such as to help us conduct our business more effectively and efficiently – for example, for general HR resourcing, IT security/management, accounting purposes, or financial planning. We may also process your Personal Data to investigate violations of law or breaches of our own internal policies.

Law-related purposes

We also may use your Personal Data where we consider it necessary for complying with laws and regulations, including collecting and disclosing staff member personal information as required by law (e.g. for tax, health and safety, anti-discrimination laws), under judicial authorization, or to exercise or defend the legal rights of our global group of companies.

4 Sharing your Personal Data

We take care to allow access to Personal Data only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it.

Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the information is used in a manner consistent with this Notice and that the security and confidentiality of the information is maintained.

Transfers to other group companies

As mentioned above, we will share your Personal Data with other members of the China Unicom group in order to administer human resources, staff member compensation and benefits at an international level on the HR System, as well as for other legitimate business purposes such as IT services/security, tax and accounting, and general business management.

Transfers to third party service providers

In addition, we make certain Personal Data available to third parties who provide services to us. We do so on a "need to know basis" and in accordance with applicable data privacy law.

For example, some Personal Data will be available to third party companies who provide us with payroll support services, relocation, tax and travel management services.

Transfers to other third parties

We may also disclose Personal Data to third parties on other lawful grounds, including:

- To comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, including, but not limited to, a subpoena, government audit or search warrant
- In response to lawful requests by public authorities (including for national security or law enforcement purposes)
- As necessary to establish, exercise or defend against potential, threatened or actual litigation
- Where necessary to protect the vital interests of another person
- With your consent.

5 Legal basis for processing your Personal Data

Our legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it. We use Personal Data about our employees where we need the Personal Data to perform a contract with you (i.e. to administer an employment or work relationship with us) or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. Our legitimate interests include transmitting personal data within the group for internal administrative purposes.

We take measures to ensure that your Personal Data is kept secure and to limit our processing activities to what is necessary for our legitimate interests. We also give you the right to object to processing that we undertake for our legitimate interests (please see the section entitled "Your data protection rights" below); however please note that if you exercise your right to object to some of our processing activities we may need to restrict your access to our facilities.

In some cases, we may also have a legal obligation to collect Personal Data from you or may otherwise need the Personal Data to protect your vital interests or those of another person (e.g. for the purposes of contacting emergency services in the event of an accident at our facilities) or for other legitimate employment related purposes.

6 Who will process your Personal Data and where will it be processed?

Your Personal Data may be processed by the Company and by those categories of third parties to whom we are entitled to disclose your Personal Data. Your Personal Data may be transferred to and processed in countries outside of the European Union. These countries may have data protection laws that are different to the laws in the United Kingdom or European Union. Specifically our group companies including China Unicom (Hong Kong) Operations Limited.

Where we do transfer your personal data outside of the European Economic Area, we will endeavour to take appropriate safeguards to require that your Personal Data will remain protected in accordance with this Notice.

7 How do we keep your personal data secure?

We use appropriate technical and organisational measures to protect the Personal Data that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your Personal Data.

8 Data retention periods

Personal Data will be stored in accordance with applicable laws and kept as long as needed to carry out the purposes described in this Notice or as otherwise required by applicable law. Generally this means your Personal Data will be retained until the end of your employment, or work relationship with us plus a reasonable period of time thereafter to respond to employment or work-related inquiries or to deal with any legal matters (e.g. judicial or disciplinary actions), document the proper termination of your employment or work relationship (e.g. to tax authorities), or to provide you with ongoing pensions or other benefits.

For more information about how we retain your personal information, please see our Data Retention Policy.

9 How you should process Personal Data on behalf of the company

Everyone who works for, or on behalf of the Company has responsibility for ensuring Personal Data is collected, stored and handled in accordance with this section 9.

You should only access Personal Data covered by this Notice if you need it for the work you do for, or on behalf of the Company, and only if you are authorised to do so. You should only use the Personal Data for the specified lawful purpose for which it was obtained.

You should keep Personal Data secure and not share it with unauthorised people (including for the avoidance of doubt, third parties).

You should review and update any Personal Data which you have to deal with on the Company's behalf. This includes telling the Company if your own contact details change.

You should securely dispose of any unnecessary copies of Personal Data.

Do not save Personal Data to your own personal computers or other personal devices.

Do not transmit Personal Data using social media (including private WeChat) unless specifically required to perform your duties (for example, if you are using social media for public relations purposes).

Personal Data should never be transferred outside of the European Economic Area, except in compliance with the law. You may transfer Personal Data to our group companies within the European Economic Area or Hong Kong in accordance with the Company's policies.

All physical copies of Personal Data should be locked in draws and filing cabinets, and should not be removed from the Company's premises without the prior authorisation of the HR team.

10 How we will deal with data breaches

We have put robust measures in place to minimise and prevent data breaches from taking place. Should a breach of Personal Data occur (whether in relation to you or someone else), then we must take notes and keep evidence of that breach. If the breach is likely to result in a risk to the rights and freedoms of individuals then we must also notify the Information Commissioner's Office within 72 hours.

If you are aware of a data breach you must contact the Data Protection Unit immediately, and keep any evidence you have in relation to the breach.

11 Your data subject rights

You have the right to access your own Personal Data by way of a 'Subject Access Request'.

You can obtain information about the Company's data processing. You can correct any inaccuracies in the Personal Data we hold about you. To do so please contact the HR team. You have the right to request that we erase your Personal Data where we are not entitled under law to process it, or it is no longer necessary to process it for the purposes for which it was collected. To do so please contact the HR team.

If we have collected and process your Personal Data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Data conducted in reliance on lawful processing grounds other than consent.

For more information about exercising your data subject rights, please see our Data Subject Rights Handling Policy.

12 Updates to this Notice

This Notice may be updated periodically to reflect any necessary changes in our privacy practices. In such cases, we will inform you either on the intranet or by company-wide email and indicate at the top of the Notice when it was most recently updated. We encourage you to check back at our public folder periodically in order to be aware of the most recent version of this Notice.



13 Useful contacts

For any queries, concerns, escalations or requests you may have in relation to this Notice, the Personal Data we hold in relation to you, and how it is processed, please contact the legal and HR team.