



People Data Privacy Policy

INTRODUCTION

Showmax recognises that many countries regulate the collection and use of personal data relating to employees. This People Data Privacy Policy (“this Policy”) describes a baseline set of common principles governing the handling of personal data within the Showmax Group. In case of discrepancy between any local policy implemented by a Showmax Group Company and this Policy, the local policy shall prevail.

By a ‘Showmax Group Company’ we understand Showmax B.V. and Showmax s.r.o., all Showmax Group Companies will be understood as “Showmax” or “Showmax Group”.

1. WHAT THIS POLICY COVERS

This Policy applies to all personal data about past, present and prospective employees both temporary or permanent employees, contractors, consultants and trainees (“You”) that is collected, maintained or used by directors, officers and employees of any Showmax Group company (“we/us”) as part of an actual or prospective employment relationship.

Personal data collected, maintained or used outside of the employment relationship, such as personal data arising from your use of our consumer products or platforms, is not covered by this Policy.

Nothing in this Policy is intended to form a contract of employment or otherwise.

At our discretion and as necessary, we may amend this Policy from time to time. We will notify you when updates are made.

2. OUR APPROACH

We value our employees and appreciate the importance of treating personal data as confidential. In this Policy we outline our global standards for personal data-privacy practices so that you have an opportunity to understand our approach.

We require any directors, officers and employees entrusted with your personal data as part of their job responsibility to treat it as confidential and in conformity with this Policy.

We will also seek to assure that any third-party service providers we use to administer our Human Resources programmes, as described in Section 6 below, are bound to maintain confidentiality when handling your personal data on our behalf, in a manner that is consistent with this Policy.

3. PERSONAL DATA CATEGORIES

We generally process the following personal data about you over the course of recruitment or employment:

- Your biographical information, including your name, gender, date of birth, details of family members, previous job history, education details;
- Your contact information, including your home and postal address, telephone number, email address;
- Your identification numbers, including government-issued identification number;
- Your performance information, including management metrics, appraisals, feedback;
- Communications and internet information like Your correspondence and details of internet use held on or made through Showmax systems subject to relevant restrictions under applicable law;
- Payroll information, including your salary details and bank account information;
- information on benefits that we may grant you as part of the employment relationship.

We most often collect personal data about you directly from you in the course of your application and employment. We may also use other sources, subject to restrictions under applicable law, to assist in obtaining relevant personal data about you for example in relation to investigations of possible employee wrongdoing and to help us locate former employees and beneficiaries for purposes of administering certain benefits plans.

Our Human Resources programmes require personal data about you to function properly. In limited circumstances some programmes may involve certain sensitive health information (e.g. medical certificates submitted to us or other health-related benefits processes) and financial data (e.g. payroll) when mandated by local laws. Such sensitive personal data will be treated with the utmost care and in accordance with special requirements set out in applicable data protection and other laws, including the European Union's General Data Protection Regulation ("GDPR").

We will endeavour to collect only the minimum amount of personal data required to administer our programmes and to comply with applicable employment and other relevant laws.

4. LAWFULNESS

As required by the GDPR, we hereby set out the lawful grounds found in EU law that we rely upon for processing this personal data:

Generally, Showmax Group companies process your personal data because it is necessary to do so in connection with the performance of the employment agreements with you and where our legal duties as an employer require it. We may process your personal data where it is necessary for us to defend, prosecute or make a claim in a court of law. We may also process personal data for our legitimate interests, which requires us to put in place appropriate privacy measures to ensure that our legitimate interests are not outweighed by impacts on your interests, fundamental rights or freedoms. Where we take this latter approach, it is our policy to document the assessment we have made and the privacy measures that are in place so that these can be reviewed upon request. Finally, if none of the previous legal grounds apply, we may seek your explicit consent for specific forms of processing of your personal data, which you may decline or revoke at any time.

5. HOW WE USE THIS DATA

Your personal data may be used for the following employment-related purposes:

- to contact you and manage our relation with you, oversee compliance with policies and applicable law, assess performance, for promotions and appraisals and for training purposes;
- to store emails and documents generated by you on systems that we administer and make available for employment-related purposes, which may contain personal data;
- to manage your benefits, including administering remuneration, relocation, insurance, payroll, pensions and other employee benefits and tax and disclosing to other group companies and to others such as payroll providers, accountants, occupational health providers, insurers, pensions administrators, hosting service providers and legal advisers;
- to manage recruitment of employees, including eligibility for work, vetting, hires, promotion and succession planning;

- to comply with policies, including in relation to claims, disciplinary actions or legal requirements and conducting investigations and incident response, including reviewing your communications in these situations in accordance with relevant internal policies and applicable law;
- for security purposes, for providing IT support and for employee authentication;
- to manage occupational health and absence and fitness for work and notifying family members in emergencies;
- to comply with our legal obligations and to change our business structure we may disclose Your personal data in connection with proceedings or investigations to third parties, such as public authorities, law enforcement agencies, regulators and third party litigants. We may also provide relevant parts of Your personal data to any potential acquirer of or investor in any part of Showmax' business for the purpose of that acquisition or investment;
- to facilitate business travel, travel-related support including conference attendance, bookings, and emergency support services;
- to conduct certain checks on you, such as anti-fraud checks where this is relevant in accordance with applicable law.
- to monitor equal opportunities, managing gender, disability as part of equal opportunities initiatives where applicable and allowed by the specific country's legislation;
- to manage collective agreements for administering collective employee arrangements where these are in place;
- for internal and external auditing, assurance and risk management purposes; and
- for analytics, statistical analysis and research purposes in the context of employment.

6. INFORMATION SHARING & TRANSFER

Your personal data will be shared within the MultiChoice Group¹ for the purposes described in Section 5 above to the extent necessary to carry out these purposes, and as permitted by law.

MultiChoice is a global group with a global footprint. Note that your personal data may be processed either locally in the jurisdiction where you work or reside, or in any other jurisdiction where we or our approved third-party service providers operate, worldwide, depending on the needs of the business over the course of your tenure with us, to the extent we deem necessary and as permitted by law. Should your personal data move outside the European Economic Area or another jurisdiction that restricts the international transfer of personal data, we use GDPR- and locally-compliant mechanisms to require that the same level of data protection be applied in the jurisdiction where the data is being processed.

Your personal data will only be shared outside the MultiChoice Group with third parties under the following circumstances: (1) Where a third-party service provider retained by us is under contract to assist in administering aspects of our Human Resources programmes or related corporate functions, subject to appropriate confidentiality obligations and data processing agreements, compatible with this Policy; (2) in the event that the company, business or division in which you are employed is being considered for outsourcing or sale, and then only subject to contractual requirements to preserve confidentiality; (3) with private or government authorities only when we have determined that we are required to do so under applicable laws, to investigate suspected fraud or illegality, to anticipate or defend legal claims; or to conclude a change of control of your company, business or division; (4) you have given us your prior permission to do so.

¹ MultiChoice Group includes MultiChoice Group Treasury Services and its direct and indirect subsidiaries and controlled affiliates where MultiChoice Group Treasury Services owns more than 50 per cent of the voting right to control the entity.

7. WHAT ARE YOUR DATA SUBJECT RIGHTS?

- **SUBJECT ACCESS:** You have the right to access your personal data in many circumstances, generally within 1 month of your request;
- **RECTIFICATION:** You can ask us to have inaccurate personal data amended;
- **ERASURE:** You can ask us to erase personal data in certain circumstances, recognising that Showmax must in any case respect its data retention legal obligations in the field of employment;
- **WITHDRAWAL OF CONSENT:** You can withdraw any consents to processing that you have given us and prevent further processing if there is no other legitimate ground upon which Showmax can process your personal data;
- **RESTRICTION:** You can require certain personal data to be marked as restricted for processing in certain circumstances as defined in article 18 of the GDPR ;
- **PORTABILITY:** You can ask us to provide you with a copy of your personal data in a such a form that you can send it to a third party;
- **RAISE A COMPLAINT:** You can raise a complaint about our processing with the data protection regulator in your jurisdiction . If you find it difficult to contact the data protection regulator, we will help you. Please contact us at peopleprivacy@showmax.com .

8. DATA SECURITY

Maintaining the security and integrity of your personal data is a high priority and we endeavour to maintain appropriate administrative, technical, personnel and physical measures to safeguard personal data against loss, theft, and unauthorised uses or modifications.

We expect you to contribute to the culture of the Showmax Group by following appropriate security policies and procedures, completing assigned trainings, and reporting suspected incidents to relevant incident response contacts promptly.

9. DATA RETENTION

We keep records of your personal data no longer than necessary for the purpose for which we obtained them and for any other permitted compatible purposes, including compliance with legal obligations in the field of employment law. In case we process your personal data on the bases of your explicit consent we process your data for the period of one year.

10. DATA CONTROLLER

Unless we provide you with other information, if you are applying for a job or you are employed in:

- Czech Republic – the data controller of your personal data is Showmax s.r.o. with its registered seat in Beroun, Politických vězňů 1940, Beroun-Město, 266 01 Beroun
- Other territories than stated above – the data controller of your personal data is Showmax B.V. with its registered seat in Taurusavenue 105, 2132 LS Hoofddorp, The Netherlands.

11. CONTACTS

To exercise your data subject rights, or if you have questions about this Policy, please send an email to: peopleprivacy@showmax.com

If there are any updates or changes in your personal data please notify us by contacting your human resources representative so that we can ensure accuracy.

ANNEX – SHOWMAX S.R.O.

This Annex to the Showmax People Data Privacy Policy is aimed at presenting you detailed information about processing of your personal data by a local Showmax Company.

1. DATA CONTROLLER

The controller of your personal data in relation to your employment is Showmax s.r.o., Company ID No.: 037 37 101, with its registered office at Politických vězňů 1940, Beroun-Město, 266 01 Beroun, incorporated in the Companies Register kept by the Municipal Court in Prague under file No. C 236914 (“Local Data Controller”)

2. DATA CONTROLLER CONTACT DETAILS

In all matters related to processing of your personal data for human resources purposes you can contact Local Data Controller:

- electronically via e-mail to: peopleprivacy@showmax.com,
- and/or in writing to Politických vězňů 1940, Beroun-Město, 266 01 Beroun.

3. ADDITIONAL DATA PROCESSED BY THE LOCAL DATA CONTROLLER

When you perform your activities, we process a variety of personal data which may be generally divided into the following categories:

(a) Identification data

The identification data includes the first name, surname, photographs, permanent address, ID card number, date and place of birth, birth identification number.

(b) Data on medical fitness

Data on medical fitness include mainly information on medical fitness to perform some specific work, information on occupational health examinations, data on the incapacity for work, data on changed or reduced capacity for work.

(c) Data relating to occupational safety and health and fire protection

This data includes, in particular, your identification data, data on accidents at work, attendance at trainings and health assessment.

(d) Audio-visual record pro company premises

Our records include audio and visual records of people, objects and events and allow us to monitor the security of our staff, our premises and our assets, our clients' assets which is located at our premises and also the provision of our services.

We would like to assure you that no automated decision making or profiling occur when wprocess personal data.

4. ADDITIONAL PURPOSES

(a) Records of employee attendance

To ensure a safe and smooth movement at our premises, we assign personal chip cards to our employees to be able to enter and exit our premises. Using them, we record data on your entering the premises.

(b) Client service

In order to offer and provide services to our clients, our company provides clients and potential clients with, in particular, the identification and contact information of employees who provide / will provide them. This data is provided to our clients on the basis of legitimate interests of our company.

Provision of this data is not a contractual or legal obligation, but without providing such data, the Company will not be able to provide services.

(c) Processing of photographs of our current employees

We process the photographs of our current employees for the purposes of legitimate interests of the company, especially for easier orientation in the company's sitting order and for internal communication. Provision of a photograph is not a legal or contractual obligation but we are entitled to it.

(d) Monitoring of our premises

In order to prevent crime, protect our property, detect crime, and protect our employees, we use systems that produce audio-visual records of our company's premises.

With this monitoring, an audio-visual record is effectively made of the premises with passers-by, previously unknown persons who may be our employees. We process this data based on our legitimate interests. The monitored objects are also marked with an appropriate pictogram. Processing of any data is not a statutory or contractual obligation but our legitimate interest. Failure to provide it would make it impossible for us to protect our property.

(e) Transfer of personal data within the group

The company is a member of MultiChoice group operating a common administrative system, which includes, among other things, the sharing of personnel information. In the light of the foregoing, your personal data (identification, contact and demographic) will be transferred for internal administrative purposes (including statistical ones) to affiliates of the company, both within the EU (or EEA) and outside the EU (or EEA) if all the conditions under the applicable personal data legislation, in particular Article 46 of the Regulation, are met for such transmission. Such transfer of personal data to countries outside the EU (or EEA) occurs on the basis of standard contractual clauses. Processing for internal administrative purposes is a legitimate interest of the company. Failure to provide this data would result in functionality limitations of the administrative processes within the group.

(f) Monitoring of our systems

In order to prevent misuse of personal data, detect extraordinary activity and protect customer and employee personal data we monitor electronic access to our systems with logs and we control electronic access to our systems.

5. RETENTION PERIOD

We keep your personal information for a different amount of time depending on the reason for its processing, and we are obliged, in particular, to respect the statutory limits for the storage of certain documents containing your personal information.

We use and keep the personal information (or documents where it is contained in) for:

- three calendar years from the end of the year to which they relate in the case of copies of personal files and data on the provision of voluntary benefits which do not affect the calculation of wages and employee contributions;
- five calendar years from the end of the year to which they relate in the case of pay checks and records of OSH and FP training;
- ten years after termination of employment in the case of data contained in your personal file, including the evidence of commencement, termination and changes in employment and wage scales;
- ten calendar years from the end of the year to which they relate in the case of the recording of work hours, tax returns and all data affecting the calculation of the employee's wages and contributions, including data on bonuses and voluntary benefits;
- thirty calendar years from the end of the year to which they relate in the case of wage sheets (if you are retired or a recipient of disability pension, then only for the period of ten years);
- the duration of the labour or similar relations for the management, use and control of entrusted work means, processing of photographs, data transmission within the group and for client service.

After the above deadlines, we are authorized to process your personal data only for compatible purposes.

We keep your personal information solely on servers of our company or by our trusted partners.