

## Applicant Personal Information Protection Notice

**Last Updated: November 2018**

Warner Music Group Corp. (“**Company**,” and together with its affiliates collectively, “**WMG**”) values your trust and is committed to the responsible management, use and protection of Personal Information. This Applicant Personal Information Protection Notice (“**Notice**”) describes our practices in connection with all the information that Company collects through our online careers website (located at [Global \(Non-U.S.\) Careers](#)) (“**Careers Site**”) and offline in connection with your application for a job or internship with WMG (hereinafter referred to as “Personal Information”). Personal Information submitted elsewhere on WMG websites will be used in accordance with our general online [Privacy Policy](#)

### **PERSONAL INFORMATION WE COLLECT**

In connection with your application, Personal Information we collect includes:

#### **Information You Provide**

- Name, address, telephone number, e-mail address, and other contact information;
- Application source;
- Social media and network URLs (such as LinkedIn, Facebook, etc.);
- Username and password;
- Work authorization status;
- CV, résumé, cover letter, previous work experience and education information;
- Video and audio files submitted by you or recorded as part of the application and interview process;
- Skills;
- Professional and other work-related licenses, permits and certifications held;
- Assessment results and notes from other selection activities you may participate in through the recruitment and selection process;
- Information relating to references; and
- Any other information you elect to provide to us (e.g., employment preferences, interest in temporary employment opportunities,

willingness to relocate, current salary, desired salary, current and desired benefits package, awards or professional memberships).

We can also inquire about criminal records and credit reports. We will do so only where permitted by applicable law. Otherwise, we ask that you avoid submitting information which may qualify as sensitive information under applicable law, except where such information is legally required. Sensitive information includes race, religion, ethnicity, nationality or national origin, age, gender identity, sex life or practices or sexual orientation, marital status, medical or health information (including disability status), genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, judicial data such as criminal records or information on other judicial or administrative proceedings.

Any information you submit through the Careers Site or offline in connection with the application process must be true, complete and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your application during the application process or disciplinary action, including immediate termination of employment to the extent permitted by applicable law. In addition, it is your responsibility to ensure that information you submit does not violate any third party's rights.

If you provide us with Personal Information of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us.

### **Information from Other Sources**

For the purposes of background check reports in connection with your application and as permitted by applicable law, WMG obtains information about you from other sources.

Other sources include:

- Your references;
- Prior employers;
- Educational institutions you attended;
- Professional, licensing or accreditation organizations; and
- Background check report; criminal history; credit report (for certain positions) and proof of identity report.

### **USE OF INFORMATION**

We collect and process Personal Information about you for one or more of these reasons:

- a) Because you voluntarily provide this information and consent for us to process it;
- b) Because this information is necessary to take steps at your request prior to entering into an employment or internship;
- c) Because this information is of particular importance to us and we have a specific legitimate interest under law to process it;
- d) To comply with a legal obligation; or
- e) Where necessary to protect the vital interests of any person.

Where the collection or processing is based on your consent, you may withdraw your consent at any time to the extent permitted by applicable law and in accordance with the process established in this Notice.

The information that you submit on the Careers Site or offline in connection with the application process will be used for WMG's global personnel recruitment, management and planning purposes, as permitted by applicable law, including:

- To process your application. We will engage in these activities to manage our prospective employment or internship relationship with you, based on our legitimate interests;
- To assess your capabilities and qualifications for a job. We will engage in these activities to manage our prospective employment or internship relationship with you, based on our legitimate interests;
- To conduct reference checks. We will engage in these activities to comply with a legal obligation or based on our legitimate interests;
- To respond to your inquiries and communicate with you about your application, and to send you information regarding the Careers Site and changes to our terms and policies. We will engage in these activities to manage our prospective employment or internship relationship with you;
- To comply with or monitor compliance with any applicable law or regulation. We will engage in these activities to comply with a legal obligation or based on our legitimate interests;
- To conduct background checks if we offer you a position. We will engage in these activities to comply with a legal obligation or based on our legitimate interests; and
- To preserve our other legitimate interests, for example, for WMG's administrative purposes, aggregate management reporting, internal training, and as generally required to conduct our business within Company and its affiliates.

The information about you will be added to our international candidate database which may be used to consider you for opportunities at Company and its affiliates other than the one(s) for which you apply. If you do not wish us to do this, please contact [recruitment@wmg.com](mailto:recruitment@wmg.com). The information collected about you is also used by us to analyse responses to job postings and create statistical reports of applicants.

If we hire you, Personal Information we collect in connection with your application will be incorporated into our human resources system and used to manage the new-hire process; any such information can become part of your employee file and used for other employment-related purposes.

Providing Personal Information to us through the Careers Site or offline in connection with the application process is voluntary. However, if you do not provide sufficient information, we may be unable to consider your employment application or, if you are hired, your subsequent promotion, transfer, or relocation.

## **DISCLOSURE AND TRANSFER OF INFORMATION**

Company shares Personal Information with affiliates that are involved in evaluating candidates for a given position to manage any job application and, in general, the recruitment processes. Company will remain responsible for Personal Information that is jointly used with affiliates. You can consult the list and location of our affiliates at <https://wminewmedia.com/affiliates>.

We will limit access to Personal Information to personnel with a business need to know the information for the purposes described in this Notice, including personnel in the recruiting, human resources and information technology departments, and in the department(s) responsible for the position for which you are applying and for other open positions for which you may be qualified.

Company also shares Personal Information with our third-party service providers who provide services such as hosting and operating the Careers Site, recruiting assistance, background check processing, and similar services, in accordance with applicable laws and regulations.

Disclosing your Personal Information can include transferring Personal Information to other countries, including the United States or any other country in which we or our service providers have operations. If you are located in the European Economic Area (the "EEA") this may include countries outside of the EEA. Some of these countries are recognized by the European Commission as providing an adequate level of protection according to EEA standards (the full list of these countries is available at : [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en).) As for transfers to other countries, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to protect your information. You may obtain a copy of these measures by contacting us using

one of the methods in the “**Contact Us**” section below or consult standard terms at [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en).

## **OTHER USES AND DISCLOSURES OF INFORMATION**

We also use and disclose your Personal information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- To comply with applicable law.
  - This can include laws outside your country of residence.
- To respond to requests from public and government authorities.
  - These can include authorities outside your country of residence.
- To cooperate with law enforcement.
  - For example, when we receive law enforcement requests and orders.
- For other legal reasons.
  - To enforce our terms and conditions; and
  - To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
- In connection with a sale or business transaction.
  - We have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings.)

## **DATA RETENTION**

We will retain Personal Information for the period necessary to fulfil the purposes outlined in this Notice unless a longer retention period is required or permitted by law. The criteria used to determine our retention periods are: (i) the duration of the application process; (ii) as long as we have an ongoing relationship with you; (iii) as required by a legal obligation to which we are subject; (iv) as advisable in light of our legal position (such as in regard of applicable statutes of limitations, litigation, or regulatory investigations).

We may also retain your Personal Information for the purpose of considering whether your skills are suitable for other opportunities. If you do not wish us to do this, please contact [recruitment@wmg.com](mailto:recruitment@wmg.com).

We may remove Personal Information for inactive accounts from our database, subject to any applicable legal or regulatory obligations.

Furthermore, Company can delete Personal Information about you (including your CV/ résumé) from our database at any time and without providing any reason, as long as the aforementioned period has elapsed. Therefore, please retain your own copy of the Personal Information provided to us.

## **PASSIVE INFORMATION COLLECTION: COOKIES AND SIMILAR TECHNOLOGY**

We and our service providers may use “cookies” and similar technologies on the Careers Site. Please see our [Cookie Policy](#) for more information.

## **CHOICES AND ACCESS**

If you register on the Careers Site, you may access, review, and change your Personal Information stored therein by logging into the Careers Site and updating your account information. The updated profile will be used as the default the next time you apply for a job using your account online. To change Personal Information that you have already submitted for consideration for a specific position, please update your profile and resubmit your application for that position. We encourage you to promptly update your Personal Information if it changes or is inaccurate.

If you would like to request to review, correct, update, suppress, restrict or delete Personal Information, object to the processing of Personal Information, or if you would like to request to receive an electronic copy of your Personal Information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact us at [recruitment@wmg.com](mailto:recruitment@wmg.com) or Warner Music Group Corp., Attn: Talent Acquisition, 1633 Broadway, 7<sup>th</sup> Floor, New York, NY 10019 with copy to [nadia.ceron@warnermusic.com](mailto:nadia.ceron@warnermusic.com). We will respond to your request within a maximum period of 20 (twenty) days from the receipt of your request.

In your request, you must: (i) indicate your name; (ii) indicate your address or other communication media to communicate the response to your request; (iii) attach the documents that prove your identity (INE, passport or military card); (iv) make clear what Personal Information you would like to access or have changed, whether you would like to have Personal Information that you have provided to us suppressed from our database, or what limitations you would otherwise like to put on our use of your Personal Information. For your protection, we only implement requests with respect to the information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. Please note that certain Personal Information may be exempt from such requests pursuant to applicable data protection laws or other laws and regulations.

## **ADDITIONAL INFORMATION FOR THE EEA**

You also may:

- Contact us at [recruitment@wmg.com](mailto:recruitment@wmg.com) with any questions about this Notice.
- Individuals in Germany, Austria or Switzerland may contact our DPO in Germany, Melanie Ludolph, via [mludolph@intersoft-consulting.de](mailto:mludolph@intersoft-consulting.de).
- Lodge a complaint with a data protection authority for your country or region, or in the place of the alleged misconduct. A list of data protection authorities may be found at [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080).

## SECURITY

We seek to use reasonable organizational, technical and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the **“Contact Us”** section below.

Company hereby disclaims, as far as permitted by local laws, any liability for itself and its affiliates and contractors for any Personal Information we collect in connection with your application that is lost, misused, illegally accessed, disclosed, altered or destroyed or not timely delivered to our Careers Site.

## LINKS TO THIRD-PARTY WEBSITES

This Notice does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the Careers Site links. The inclusion of a link on the Careers Site does not imply endorsement of the linked site or service by Company or our affiliates. We encourage you to read the legal notices posted on those sites, including their privacy policies.

## LAW APPLICABLE TO JOB APPLICATION

The Careers Site allows you to apply for non-U.S. jobs in many locations, as a benefit of Company’s centralized global recruitment function. The Careers Site is operated from the United States. Accordingly, any Personal Information you submit to the Careers Site will be collected in the United States and will be subject to U.S. laws. However, if we share your Personal Information with an affiliate located in another country in its capacity as a potential employer, the affiliate will handle your Personal Information in accordance with this Notice. Any hiring or other employment-related decisions will be made by the hiring affiliate in accordance with the laws of the country where the job will be located.

**The Careers Site is not intended for distribution to, or use by, any person or entity in any jurisdiction or country where such distribution or use would be contrary to local law or regulation.**

### **ABOUT CHILDREN**

The Careers Site is not intended for minors under the age of 18.

### **CURRENT PERSONNEL OF COMPANY**

If you currently work for Company or one of our affiliates, you must be eligible to apply for a different position within WMG to use the Careers Site. If you accept such a position, your benefits programs and Human Resources policies may change. Please consult with the HR manager for the new position concerning application eligibility, benefit programs, and HR policies applicable to that position.

### **CHANGES TO THE NOTICE**

We reserve the right to amend this Notice at any time in order to address future developments of Company, its affiliates, the Careers Site or changes in industry or legal trends. The “Last Updated” legend at the top of this Notice indicates when this Notice was last revised. Any changes will become effective when we post the revised Notice on the Careers Site.

### **CONTACT US**

If you have questions or requests, please feel free to contact us by email at the following address: [recruitment@wmg.com](mailto:recruitment@wmg.com) or Warner Music Group Corp., Attn: Talent Acquisition, 1633 Broadway, 7<sup>th</sup> Floor, New York, NY 10019 with copy to [nadia.ceron@warnermusic.com](mailto:nadia.ceron@warnermusic.com).

Because email communications are not always secure, please do not include sensitive information in your emails to us.

### **ACKNOWLEDGEMENT**

This Notice is part of the Terms and Conditions applicable to the Careers Site. By consenting to those Terms and Conditions, you are also acknowledging that you have received, reviewed and understood this Notice.