

PRIVACY STATEMENT EMPLOYEES

1. INTRODUCTION

In this privacy statement we are pleased to explain how VodafoneZiggo collects, uses, shares and protects your personal data.

Employees expect us to protect their privacy. Whether it is about their personal data, the confidentiality of private messages or the way we develop our products and services. The way we handle privacy is an integral part of the responsibility we have towards our employees. It is our aim to develop a company culture at VodafoneZiggo in which it is clear to everyone how important our employees' privacy is and how this is protected. VodafoneZiggo sees to it that applicable laws and regulations are observed, including the General Data Protection Regulation (GDPR).

2. WHO ARE WE?

VodafoneZiggo has various operating companies, including Vodafone Libertel B.V. and Ziggo B.V. The name of the legal entity mentioned in your employment contract is the name of your employer. We are responsible for personnel matters, including the processing of personal data of our employees.

3. DEFINITIONS

In this privacy statement the terms listed below have the following meaning:

"we/us/our"	every member of VodafoneZiggo, including Vodafone Libertel B.V., Ziggo B.V., Ziggo Services B.V., Ziggo Services Employment B.V. and Liberty Global Content Netherlands B.V., depending on which operating company you are employed by;
"third party"	not being you, us, or a member of VodafoneZiggo Group Holding B.V.; and
"VodafoneZiggo"	VodafoneZiggo Group Holding B.V. and any partnership or other organisation in which VodafoneZiggo Group Holding B.V. holds more than 20% of the share capital;
"personal data"	all information regarding an identified or identifiable natural person;
"data subject"	the individual who is the subject of personal data. In this case you, the employee.

4. FOR WHICH PURPOSE DO WE PROCESS YOUR PERSONAL DATA

VodafoneZiggo collects personal data on the basis of:

1. **the implementation of your employment contract with VodafoneZiggo** and in order to take action following a request, like a leave application, or to pay the correct wage; or
2. **a legitimate business interest of VodafoneZiggo**, like fraud prevention, safeguarding the security of our systems, meeting our goals regarding diversity and integration, when you participate in events organised by VodafoneZiggo and improving the service provision to our employees; or
3. **the compliance with a legal obligation**, in accordance with our company policy and procedures determining the extent of our legal assistance; or
4. **your consent**, in so far as VodafoneZiggo cannot rely on any other legal basis or in addition to the implementation of an agreement or reliance on our legitimate business interests, like when you voluntarily provide information and give your consent for processing that information. You can revoke this consent at any time.

In implementation of the above, it can be necessary to transfer your personal data to other members of VodafoneZiggo or to third parties that (or of which the servers) are located in countries outside the European Economic Area (EEA). When we transfer your personal data to a country outside the EEA, we ensure the adequate protection of your personal data.

5. WHAT PERSONAL DATA DO WE PROCESS OF YOU?

We collect personal data about you from the moment you apply for a job at VodafoneZiggo and thereupon if you are hired in the context of commencing the employment. Some data we collect about you are laid down by law or are required to carry out the employment contract with you or meet the obligations arising from that contract. The reason will be explained at the time of collecting your data. If you do not provide this data, we cannot enter into an employment contract with you, nor can we meet our obligations arising from such a contract, like payment of wages and approval of leave applications. During your employment, our internal processes and applications also generate other data about you.

We can collect the following types of personal data about you:

- a) Personal details, like name, date of birth, home address, personal email address, telephone number, contact details in case of an emergency, copy identity card;
- b) Personnel details, meaning details related to your job, like employee reference number, changes in terms of employment, dismissal or resignation letter, service record, leave forms, company email address, number company mobile, job title, job description;
- c) Job application details, like your letter of application, CV, notes of the conversation, references from previous employers, internal references;
- d) Wage and payment details, like citizen service number, salary statements, travel allowances (e.g. carpooling), bank details, tax details, expense statements and allowances, pension details;

- e) Performance and career details, like completed courses, course results, qualifications, information regarding personal development, job evaluations, survey results, disciplinary measures;
- f) General personnel matters, like correspondence with HR, redundancy arrangements, complaints;
- g) Access details, like your VodafoneZiggo username and password to log onto the VodafoneZiggo network;
- h) Details related to the use of company equipment, networks, accounts and company communication systems;
- i) Details related to company security, like camera footage and details of access passes;
- j) cookies, on certain internal HR pages and the VodafoneZiggo intranet.

Furthermore, we can process sensitive personal data about you – but only if this is absolutely necessary to fulfil our obligations as an employer. These include, among other things:

- a) health data, like sick leave, advice/statements by a company doctor, details to pay out sick pay or details in connection to maternity leave or details necessary in fulfilling our obligations arising from the Working Conditions Decree;
- b) information about your criminal history, pursuant to the examination of your background as part of the selection procedure and/or the execution of our screening policy.

6. WHAT DO WE USE YOUR PERSONAL DATA FOR?

Personal data we collect about you can be processed for the following purposes:

- a) **Recruitment**, like internal recruitment, acceptance of employees in the international mobility programme of VodafoneZiggo. In that context we may collect your private email address in order to be able to contact you during the selection process;
- b) **Training and development**, like identifying a learning requirement, registering and offering training courses and workshops. Our learning management system, for example, may use your profile to recommend certain courses;
- c) **Reward and recognition**, like determining reward and recognition based on periodical job assessments or for the management of share plans. Data can also be used, for example, for calculating the level of a bonus;
- d) **Communication & Engagement**, like conducting employee surveys, communicating important company changes. We can conduct research among our employees, for example, to obtain people's opinion about certain topics like diversity and integration;
- e) **Protecting the safety, health and well-being of the employees**, like monitoring incidents in the field of safety and well-being, safeguarding the well-being of the employees, carrying out safety and welfare inspections. Information about incidents, for example, can be used to register company incidents;
- f) **Effectivity & Changes**, like internal reporting and analysis to support company changes or to assess organisational effectivity. Data regarding your working location and your

access pass can be used, for example, to gather insight into the workplace requirement at the various locations;

- g) **Information protection and research**, like using our Data Loss Prevention-Tool, to prevent unauthorised storage and distribution of classified information (inside and outside VodafoneZiggo);
- h) **Work practices and administration**, like processing changes in the personnel administration with regard to your employment, like leave, end of employment, absence, expenses, office IT and salary records, handling of complaints and requests received by HR;
- i) **Performance and career**, like registration of job evaluations, tailored to company goals, potential of employee, career expectations, management of resources. Job evaluations, for example, can be used to determine who is eligible for participation in a talent programme;
- j) **Compliance with our legal obligations as an employer**, like tax obligations by providing data about your employment. We provide tax details to the tax authorities, for example;
- k) **Fulfil our contractual obligations as your employer**, in the context of implementing your employment contract. We need to enter your name, date of birth, and other details in your employment contract;
- l) **Other processing activities in the context of facilitating your work**, like, for example, during logging into company networks we can process other personal data about you (see annex 1 for more details).

Monitoring the use of company equipment, networks and accounts.

To protect business data of VodafoneZiggo and the integrity of our IT systems, we monitor the use of our:

- Company devices (like laptop, tablet, and company mobile);
- Company networks (like access to document management systems, your use of our internal networks and your online activities);
- Company communication accounts (like messages sent via Outlook, Microsoft Teams, Yammer, Skype for Business – including in certain cases inspecting the content of these messages).

NB: Information will only be stored or inspected if it is moved or sent in violation of the **Security policy and Fraud policy of VodafoneZiggo**, even when you are not connected to the VPN, with due observance of the applicable national laws and regulations. Article 7 of this privacy statement describes where to find more information about this policy.

We routinely inspect the use by our employees of the company network and connections in order to be able to identify threats like computer viruses, visits to suspect websites, attempts to gain unauthorised access and internal misuse (like breach of the information security policy). Furthermore, your company devices are equipped with software that monitor which information is sent from that device, reporting any breach the moment one logs into the VPN again.

You are advised to read the applicable guidelines. They explain how company equipment, networks and communication systems should be used in order to comply with the internal corporate policy. The information security policy explains our security controls in more detail.

In specific cases (for example when an internal investigation starts, or when VodafoneZiggo is obliged to provide information in the context of an investigation by the regulatory authority or in the context of a judicial procedure) we can:

- Check your use of our company equipment, networks and communication systems remotely;
- Ask you to hand over the company device provided to you for the purpose of forensic investigation (**NB:** any personal information you may have stored on the device, like pictures, documents or apps, can be inspected during this investigation by the investigating officer); or
- Check your travel expense claims to determine whether or not expenses have been claimed that are not in accordance with internal company policy;
- Apply other means in the context of an investigation to protect the legitimate interests of VodafoneZiggo and under the applicable laws and regulations.

The information gathered in the context of an internal investigation can be used in disciplinary or legal proceedings that are brought against you ensuing from that investigation. Please refer to our Fraud policy for more information.

For the sake of clarity: under no circumstance do we monitor your use of company equipment when you use it for:

- Other apps than work apps (for example when you use your company mobile for downloading and opening apps like Facebook, Netflix and Amazon or to take pictures); or
 - Storing personal information, like photographs, documents or apps, on cloud-accounts for personal use (like One Drive, Google Docs, Dropbox or Facebook) (but an investigating officer may have access to this personal information if it has been stored on the hard drive of the device).
- Analysis & Profiling

We may process the personal data we collect about you for internal analysis, in the context of determining the future staffing strategy of VodafoneZiggo, especially in considering changes in business operations, or in assessing the effectivity of the organisation.

For example:

- In certain cases for drawing up **profiles**, for the purpose of being able to identify smaller groups of employees or people (e.g. for risk profiling or determining fraud).
- In certain cases **anonymous, aggregated insights** are generated; in these insights aggregated from these analyses, you cannot be identified in any stage of the processing of your personal data for these purposes.

- We do not use these insights generated on the basis of these analyses for the purpose of **automated decision-making** (meaning decision-making by software, without human intervention). The insights generated by such analyses are used to gather additional information and data as part of the decision-making process.
- In all cases this processing is meant for **internal purposes** only.

In certain cases you can indicate that you do not want your personal data to be used for analysis and profiling purposes (**opt-out**). Please refer to article 10 'Your rights' for more information.

Some examples of analysis purposes for which personal data of employees is used:

- **Expense claims:** processing information about expense claims by employees in order to determine whether expenses and claims are in accordance with the internal travel and accommodation expenses policy and in order to determine any possible fraud with expense claims;
- **Analysis of remuneration:** processing of information about remuneration (salary, bonus, provision) of our employees in relation to possible issues regarding equal pay and unequal pay of men and women. The results of that analysis can subsequently be used to change the strategy for staffing policy at VodafoneZiggo in order to respond to such issues. Furthermore, processing within specific application(s) in the context of maintenance and work by technicians (see annex).

7. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

VodafoneZiggo does not supply your personal data to others without reason. However, VodafoneZiggo is allowed to do so if you have given your consent, or if it is obliged to do so under the law or a court ruling, or if such a provision is consistent with the purpose for which the data has been gathered. We can provide your personal data to:

- Other members of VodafoneZiggo;
- Companies or advisers providing services to or for VodafoneZiggo, like pension scheme administrators, administrators of share plans, car leasing companies, business travel agencies and other companies that provide services to VodafoneZiggo;
- A third party providing services to VodafoneZiggo, for example in implementing our internal screening policy during the selection process;
- Several training and educational institutes in the promotion of your personal and job-related development (via Progress For You platform);
- Law enforcement authorities, government institutes, regulatory authorities, courts of law or other public bodies, if we are required or permitted by law to do so;
- A third party or institution in so far as publication is required to comply with applicable laws and regulations;
- Other third parties if we have your consent to do so (for example to provide references about you to a bank, housing association, landlord or estate agent);
- in connection with a merger, sale or acquisition of a member of VodafoneZiggo.

8. HOW DO WE PROTECT YOUR PERSONAL DATA?

VodafoneZiggo handles your personal data with utmost care. By means of various technical and organisational measures, your personal data is protected as effectively as possible against unauthorised access and unauthorised use. In addition, our buildings and workplaces are protected as well. VodafoneZiggo also conforms to the data breach notification obligation as described in the [Data Breaches Reporting Obligation Procedure](#).

9. HOW LONG DO WE STORE YOUR PERSONAL DATA?

VodafoneZiggo will never retain personal data any longer than necessary for the purpose for which the data has been collected, in compliance with the maximum statutory retention period. For all the details please refer to our [Data retention policy](#).

10. YOUR RIGHTS

Since VodafoneZiggo processes your personal data, you have a number of rights under legal regulations. If you want to exercise any of the rights listed below, please submit your request via Mijn HR (Mijn Gegevens & Privacy) or send an email to: HelloHR@vodafoneziggo.com

- a) **Right to rectification and supplementation:** you have the right to have personal data we have about you rectified if the information is incorrect, needs to be updated, or if you are of the opinion that the information is not accurate.
- b) **Right to access:** you can submit a request for receiving a copy of your personal data.
- c) **Right to object:** in certain cases you have the right to object to the processing of your personal data by VodafoneZiggo, for example for the purpose of analysis or profiling.
- d) **Right to be forgotten (right to oblivion):** you have the right to request that we delete the personal data we have about you.
- e) **Right to restriction of processing of your personal data:** if you believe the personal data we have about you are incorrect or should not be processed by us, you have the right to request that we restrict the processing thereof.
- f) **Right to data portability (transfer of information):** in certain cases you have the right to port the personal data you have provided to us. In addition, you can also submit a request to transfer your personal data to a third party.
- g) **Right to transparent information:** VodafoneZiggo has a duty of disclosure and is obliged to inform you about what it does with your personal data.

11. CHANGES IN THIS PRIVACY STATEMENT

It is possible that VodafoneZiggo changes this privacy statement. The website always has the latest version of the privacy statement. Significant changes will be announced on My HR.

12. DO YOU HAVE ANY QUESTIONS OR A COMPLAINT?

Should you have any questions about this privacy statement or a complaint about the way VodafoneZiggo handles your personal data, please contact our Data Protection Officer: privacyoffice@vodafoneziggo.com.

We will do our utmost to help you. In case you are not satisfied, you can apply to the Dutch Data Protection Authority: www.autoriteitpersoonsgegevens.nl

Dutch Data Protection Authority, Bezuidenhoutseweg 30, 2594 AV The Hague
0900-2001201

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Appendix 1

Privacy Policy – Field Tool AutoFill

The Field Tool AutoFill consists of a physically installed application and a linked Google Chrome plug-in. VodafoneZiggo employees can choose to use this application to improve their efficiency. The Field Tool AutoFill is a tool that manages a standard set of bookmarks in Google Chrome and supports automatic login based on login details entered by the user. These login details are only present in the physically installed application. The physical application can only be installed through the internal application portal of VodafoneZiggo and is as such only accessible through VodafoneZiggo employees using VodafoneZiggo equipment/laptops.

- The Google Chrome plug-in is not publicly available in the Play Store and does not work if it cannot communicate with the physically installed application;
- The Field Tool AutoFill has been centrally configured and will only function for whitelisted websites. These are manually added to the domain URL index of the physical application;
- The Google Chrome plug-in is set to have 'access to all sites'. This is done to retain flexibility with regard to the configuration. Adding new sites (to bookmarks and for the purpose of automatic login) should be done without delay, which is enabled by setting the plug-in in this way. Every other way would require the plug-in itself to be updated whenever sites are added or updated.

Storage, protection and encryption

The Field Tool AutoFill configuration is stored in the physically installed application and automatically synchronised every two hours. This configuration does not contain any personal information.

All passwords entered by users in the application, are only stored locally and encrypted through 'salting' and AES 256-bit encryption. The communication between the physically installed application and the Google Chrome plug-in is also encrypted through 'salting' and AES 256-bit encryption. This can only be unlocked by using a master password which can only be chosen by the local user. There is no password reset functionality available to keep the information safe.

- If the user loses his master password, he is forced to go back to a factory reset of the physical application and start again;
- The master password needs to be entered every four hours, and when the browser is opened or restarted. Entering the correct password will generate a decryption key to the Google Chrome plug-in that will work for up to 4 hours (or until the browser is shut down).
- The master password is always required to gain access to previously set passwords in the application.

Personal data

The AutoFill is solely meant for increasing the efficiency of VodafoneZiggo employees.

- No user information or personal information whatsoever is sent to any server. All data will only remain present locally and only in the physically installed application;
- The personal data is limited to login details like first name and surname, passwords and email addresses.