



## News UK and Wireless Candidate Privacy Notice: How We Use Your Information

The privacy and security of your information is very important to you and to us. We want you to trust that the information we hold about you is properly managed and protected. This Privacy Notice lets you know what information we may collect about you, what we use your information for, who we may disclose it to, and how you may raise concerns or complaints if you are not happy with what we are doing.

The News Group company that may eventually engage you and News UK & Ireland Limited (together “**News UK**”) are the data controllers for the information you provide and we collect when you enquire about a role with us, and during the recruitment process, and for successful candidates the on-boarding process. This Privacy Notice covers how we process information relating to all categories of worker, including full- and part-time employees, casual workers, interns, freelancers, consultants and those seeking work experience.

### 1. What Information Do We Process

The information you provide when enquiring about or applying for a role at News UK, whether this is for an advertised role or unsolicited, will be used for the purposes of handling your enquiry or application, and to comply with our legal or regulatory obligations.

We will use the contact details you provide to us to contact you to progress your application. Additional information you provide or that we ask for, such as details about your previous experience, education, referees and for answers to questions relevant to the role you have applied for, will be used by us to assess your suitability for that role. We may also use your information to assess whether other roles may be suitable for you and advise you of those.

We rely on your consent for providing information we ask for. You do not have to provide the information, but if you don't then we may not be able to successfully complete our assessment of your suitability and so not progress your application.

Where relevant to your immigration status, if News UK intends to be your sponsor organisation, we will require information from you to complete the UK Resident Labour Market Test.

If you make an unsolicited application, we will consider your application and, if we are interested in speaking to you further, we'll contact you using the details you provided. We might ask you to provide more information about your skills and experience or invite you to an interview.

You may also be asked to provide information identifying your gender, sexual orientation, racial or ethnic origin, or religious affiliations, to assist News UK to monitor equal opportunities matters. This is not mandatory information, and it will not affect your application if you do not provide it to us. This information will not be made available to any staff outside of our Human Resources team in a way which can identify you. Any such information you do provide will be used only to produce and monitor statistics of our talent pool and workforce to help us address equal opportunities priorities.

We may also search publicly-available sources of information, such as social media platforms, to gather additional information about you. We rely on our legitimate interests to do this, to help us in assessing your suitability for a role.

We might ask you to participate in assessment days, complete tests or occupational personality profile questionnaires, and/or to attend an interview – or a combination of these. During these activities, information will be generated by you and by us and we will use this information in assessing your suitability for a role.

If you visit News UK premises, your information may be captured by access control systems or CCTV. These are used for security and safety purposes, not for the purpose of progressing your application.

If your application is unsuccessful or we do not have any suitable work at the time, we'll let you know but we might ask you if you would like us to retain your application within our talent pool so that we can proactively contact you about possible opportunities in the future. If you say yes, we will only keep your application for twelve months. We may contact you to ask if you would like this period extending. You can get in touch with us at [careers.sm-hr@news.co.uk](mailto:careers.sm-hr@news.co.uk) if you would like your CV removing from our talent pool.

## 2. How Do We Use Your Information?

If we make a conditional offer of employment to you, we will ask you for information so that we can carry out pre-employment checks and seek assurance as to your trustworthiness, integrity and reliability. You must successfully complete the pre-employment checks in order for your offer to be confirmed as unconditional. We use a third party to do these checks on our behalf and we ensure that our contract with that organisation requires it to comply with all data protection laws and our instructions in processing your information.

We are required to confirm the identity of our staff and their right to work in the United Kingdom or Ireland, or the relevant country where the role you are applying for will be based. We will therefore require you to provide us with sight of your passport or other original proof of your identity and citizenship, of which we will take a copy.

As part of our pre-employment checks, you may be required to provide:

- Proof of your qualifications;
- A criminal record disclosure, declaring any unspent convictions, provided by the relevant government agency in the UK or Ireland; or consent for a criminal records check to be carried out by us or by a third party on our behalf. We may carry out similar checks, as allowed by local laws, if your role is to be located in another country.

We will contact your referees directly to obtain references using the details you provide in your application.

When we make you a conditional offer or before any employment or engagement with us may commence, we will ask you for the following:

Bank account details – to process salary payments

Emergency contact details – so we know who to contact in case you have an emergency at work

Where appropriate, we will pass your contact details to our pension and benefits providers to allow you to take advantage of such benefits.

## Health & Wellbeing

Our Health & Wellbeing team provide our occupational health service. If we make you an offer, we will ask you to complete a questionnaire about your health. This is to establish your fitness to work and/or to identify any reasonable adjustments that may need to be made to accommodate any disability you may have or assist you to work more effectively.

## Protecting the interests of News UK and others

In the event of a complaint or claim received by us or another, your information may be used in the investigation of and response to that complaint or claim.

## 3. Who Do We Disclose Your Information To?

- **Internal Disclosures:** Information about you may be disclosed for the purposes set out above to management, Human Resources staff, line managers, consultants, advisers and other appropriate persons employed or engaged by News UK.
- **Professional Advisors:** We may disclose your information to our accountants, auditors, lawyers, insurers, bankers, and other outside professional advisors in all of the countries in which News UK and associated group companies operates.
- **Outsourcing:** Like many businesses, from time to time, we outsource the processing of certain functions and/or information to third parties – these are known as processors. Processors provide services on our behalf, including human resources management, managing payroll, training, expense management, IT systems suppliers and support; equity compensation programs, company credit card schemes, medical advice and insurance administration, trade bodies and associations, and other services. These processors can only use your information in accordance with our instructions and for no other purpose, and we oblige them to protect your personal information with appropriate security measures.

- **Mergers and Acquisitions and Corporate Transactions:** As we continue to develop and grow our business, we may buy or sell companies and other assets. In such transactions, workforce information is generally one of the business assets transferred to a buyer or disclosed (on a confidential basis) to a potential buyer. In the unlikely event that the assets or shares of News UK, or part of the company, are sold, your personal information would be included in the workforce information transferred or disclosed to the buyer.

We may also disclose your information to other third parties (such as professional advisers or consultants) in connection with any proposed or actual reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of News UK's business, assets or stock (including in connection with any bankruptcy or similar proceedings).

- **Disclosures required or permitted by law:** We will disclose any personal information we have concerning you if we are compelled to do so by a court of law or requested to do so by a governmental entity or if we determine it is necessary or desirable to comply with the law, regulation, codes of practice or industry guidelines or to protect or defend our rights or property.
- **News Corporation:** News UK is an affiliate of News Corporation, headquartered in the United States of America (<https://newscorp.com/>). The transfer of personal information to News Corporation is protected by a contract, based on the European Commission Standard Contractual Clauses. This contract requires News Corporation to protect your information to the same high standards required by data protection laws in the United Kingdom. The purposes for which News Corporation will use your information are compatible with the purposes outlined in this Privacy Notice.

If you are being considered for a new position or secondment outside of European Economic Area for News UK or another News Corporation affiliate, some personal information concerning you will be transferred to the country where the position is located. With your consent, your personal information may also be transferred to managers and/or human resources staff of News UK or other News Corp Affiliate Companies in other locations in accordance with applicable laws for them to be able to contact you with respect to applying for a different position. The jurisdictions to which the information will be transferred may or may not have laws that seek to preserve the privacy of personal information, but News Corporation's global privacy and security standards shall apply. If your information is processed by another News Corp affiliate, its privacy notice will apply.

## Protecting Your Information

The personal information we collect from you is stored by us and/or our service providers on systems protected through a combination of physical and electronic access controls, firewall technology and other reasonable security measures. Nevertheless, such security measures cannot prevent all loss, misuses or alteration of personal information. We will notify you of any material loss, misuse or alteration of personal information that may affect you, so that you can take the appropriate actions for the due protection of your rights.

## International Transfers of Your Information

We may transfer your personal information to our News UK group companies, News Corporation affiliates, and our processors outside the European Economic Area (EEA) to countries that may not have data protection rules that provide the same level of protection as required in the United

Kingdom. However, where we do this, we only transfer your information where there are appropriate data security and privacy measures and controls in place. If you would like to receive a copy of the applicable data transfer safeguards used when your information is transferred outside the EEA, please contact us at [dataprotection@news.co.uk](mailto:dataprotection@news.co.uk).

## 4. Our Legal Grounds For Using Your Information

All organisations need a legal reason to use your personal information. If they don't have one, they can't use it. There are a number of legal grounds that enable News UK to process your information. Below are the most relevant grounds you should be aware of.

**Legitimate Interests:** We may use your information where there is a legitimate reason to do so. For example, we may use your information where it would help achieve our business objectives or to facilitate a benefit to you or someone else. Such interests are to:

- to build and develop an effective workforce
- run and operate an efficient and sustainable business;
- protect the health, safety and welfare of our workforce and visitors;
- protect our rights and the rights of others;
- provide general management of all employment-related matters

We only rely on legitimate interests if the reason for using your information is fair and lawful. Where we want to rely on legitimate interests as a legal basis, we will carry out a balancing test between our legitimate interests and your privacy rights.

**With your consent:** In some cases, we may need your consent to process your personal information. Where we obtain your consent to process personal information, you have the right to withdraw that consent at any time. If you wish to withdraw your consent, please contact us at [dataprotection@news.co.uk](mailto:dataprotection@news.co.uk) with details of your request. However, whilst we respect your wishes, there may be an important reason why we need to continue to process that personal information and in such case will inform you of the legal basis on which we rely to continue such processing.

**To enter into and fulfil your contract:** We also process your personal information in order to consider entering into a contract with you or to perform the contract we may offer you.

**To comply with legal obligations:** There may be situations where we need to use your information to comply with legal and regulatory obligations or defend claims.

Applying these legal grounds to your information, in the table below we have listed the main purposes for which we process your information and the relevant legal bases that are available to us. The specific legal basis we use will depend on the activity and circumstances the information is used for. Please keep in mind that while we will usually rely on one legal basis, if that is no longer appropriate, we may be able to rely on another.

<b>Purposes of processing (why we use your information)</b>	<b>Lawful basis for the use of your information – this may depend on the specific activity</b>
Managing your enquiry or application to News UK	Your consent. Your request to enter into a contract with us. Legitimate interests
Pre-employment screening	Legitimate interests
Equal opportunity analysis	Your consent  Legitimate Interests
Occupational health programmes and Health & Wellbeing	Legitimate interests  Your consent
Emergency contact details and beneficiaries	Legitimate interests  Your consent
Protecting the health, safety and security of News UK workers and visitors, and the security of property	Legitimate interests
Complaint, litigation and claim investigation and management, and taking or defending legal actions	Legitimate interests
Monitoring by CCTV and access controls within News UK properties as well as the exterior for the safety and security of the News UK workforce and visitors	Legitimate interests

The use of CCTV recordings for complaint investigations, assessing compliance with company policy, to defend against claims, and to defend the rights of News UK and others

Legitimate interests

## 5. How Long Do We Retain Your Information?

We will retain your information for as long as necessary for the uses set out in this Privacy Notice or while there is a legitimate reason for doing so. We will also retain personal information collected and to process such personal information to comply with accounting and tax rules, regulations and any specific record retention laws.

If you accept our offer or employment or engagement, your information will be retained by us for seven years following the end of your employment or engagement. This includes information collected during the recruitment and on-boarding process, such as your criminal records declaration, fitness to work, records of any security checks and references.

## 6. Your Data Protection Rights?

You have rights as an individual which you can exercise in relation to the information we hold about you. You have the right to request:

- a copy of the information that we hold about you (this is known as a 'Subject Access Request' or SAR);
- that your information be corrected, if it is incorrect;
- that your information be deleted;
- that we restrict our processing of your information;
- that we cease processing your information; and
- that your information be provided in a portable format for another organisation where you may work.

All requests must be submitted in writing by letter or email to the HR Hub ([HRhub@news.co.uk](mailto:HRhub@news.co.uk)). Please be sure to include your full name and details of the role you enquired about or applied for. We may ask for a copy of a document evidencing your identity (such as an ID card or passport) before responding to your request.

If you request that we correct, delete or stop processing your personal information that we hold, please tell us the grounds on which you are making such a request. If we agree that the information is incorrect, or that the processing should be stopped, we will delete or correct the information. If we do not agree that the information is incorrect, we will tell you that we do not agree and record the fact that you consider that information to be incorrect. We carefully consider all requests, as there may be circumstances which require us, or allow us, to continue processing your information. If you ask us to

delete your information, we may not be able to do so due to technical, legal, regulatory or contractual constraints.

If you request a copy of information that we hold about you, please provide us with sufficient detail so that we can locate the information you are seeking.

These rights may be restricted by law, for example we may not be able to provide a copy of your information where what we hold is also the information of a third party and it is not reasonable to disclose this information. We may not disclose information that you are not entitled to receive under applicable laws (e.g., information revealing something about another individual).

## 7. Queries and Complaints

We seek to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously.

If you have any questions about this Privacy Notice, about our processing or your personal information, or any concerns or complaints regarding our handling of your information, please contact the Privacy Team ([dataprotection@news.co.uk](mailto:dataprotection@news.co.uk)).

If you have a complaint and we cannot resolve the matter, you have the right to complain to the Information Commissioner's Office in the UK ([www.ico.org.uk](http://www.ico.org.uk)), the Office of the Data Protection Commissioner in Ireland ([www.dataprotection.ie](http://www.dataprotection.ie)) or the data protection regulator responsible for the country or region where you are based.

### News UK Data Protection Officer

If you wish to contact the News UK Group Data Protection Officer, you can send an email to [dataprotection@news.co.uk](mailto:dataprotection@news.co.uk) or write to:

Group Data Protection Officer  
Legal & Compliance Department  
News UK & Ireland Limited  
1 London Bridge Street  
London  
SE1 9GF  
United Kingdom

### Changes To This Privacy Notice

We keep our privacy notices under regular review. This privacy notice is effective as of 25 May 2018.