



CONSULTANT/ FREELANCER PRIVACY NOTICE

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Table of Contents

1. INTRODUCTION	3
1.1 CATENA MEDIA AND PERSONAL DATA.....	3
1.2 WHY THIS PRIVACY NOTICE?	3
1.3 YOUR DATA CONTROLLER	3
1.4 HOW TO READ THIS PRIVACY NOTICE.....	3
2. SUMMARY OF THE CONSULTANT/FREELANCER PRIVACY NOTICE	4
2.1 WHERE DO WE COLLECT YOUR PERSONAL DATA FROM?.....	4
2.2 CATEGORIES OF PERSONAL DATA.....	4
2.3 WHY DO WE PROCESS YOUR PERSONAL DATA AND ON WHAT BASES?.....	4
2.4 RECIPIENTS WE SHARE YOUR DATA WITH	5
2.5 WHERE DO WE PROCESS YOUR PERSONAL DATA?	5
2.6 WE STORE YOUR DATA ONLY AS LONG AS IT IS REQUIRED	5
2.7 CHANGES TO THIS DOCUMENT	5
2.8 YOUR RIGHTS.....	5
2.9 FURTHER INFORMATION ABOUT HOW WE HANDLE YOUR PERSONAL DATA.....	6
3. FULL VERSION OF THE CONSULTANT/FREELANCER PRIVACY NOTICE.....	7
3.1 WHERE DO WE COLLECT PERSONAL DATA FROM?.....	7
3.2 CATEGORIES OF PERSONAL DATA	8
3.3 WHY DO WE PROCESS YOUR PERSONAL DATA AND ON WHAT BASES?.....	12
3.4 RECIPIENTS WE SHARE INFORMATION WITH.....	24
3.5 HOW LONG DO YOU STORE MY PERSONAL DATA?	30
3.6 WHERE DO WE PROCESS YOUR PERSONAL DATA?	30
3.7 YOUR RIGHTS.....	30
3.8 CHANGES TO THIS DOCUMENT.....	32
3.9 WHO DO I CONTACT IF I HAVE QUESTIONS?	32

1. INTRODUCTION

1.1 CATENA MEDIA AND PERSONAL DATA

It is important for us at Catena Media that you feel comfortable with how we handle your personal data. That is why we are open about what and how we collect, use and share your personal data, or in privacy terms, process it.

Catena Media takes data protection seriously and every individual within Catena Media is responsible for protecting personal data about each other as well as that of our customers, business partners and suppliers.

Catena Media (“we” and “us”) means Catena Media PLC and any of its directly or indirectly owned or controlled subsidiaries.

1.2 WHY THIS PRIVACY NOTICE?

This Privacy Notice explains when, why and how we process information which may relate to you ("personal data"), a consultant/freelancer on a definite (time-limited) or indefinite basis. It also provides important information on your statutory rights.

The Privacy Notice is not a contract. Neither is it intended to override the terms of any contract you have with us, nor rights you might have under applicable laws.

1.3 YOUR DATA CONTROLLER

The Catena Media company as per your consultancy/freelancer agreement is the primary data controller for the processing of your personal data in accordance with this document, unless otherwise stated.

“*Data controller*” means the company that determines the means and purposes of processing of your personal data.

1.4 HOW TO READ THIS PRIVACY NOTICE

In this Privacy Notice you will find a:

- a) **Summary** which is a condensed version to give you a brief overview of how Catena Media handles your personal data.

Go to Section 2.

- b) **Full version** where you can read in detail about how we process personal data, your rights and for how long we keep personal data.

Go to section 3 & Appendices 1-3.

2. SUMMARY OF THE CONSULTANT/FREELANCER PRIVACY NOTICE

2.1 WHERE DO WE COLLECT YOUR PERSONAL DATA FROM?

We may collect personal data from:

- Yourself
- Managers, HR and occasionally other colleagues and recruitment agencies
- Relatives and other related persons (in the event of an accident or other emergency situation we may collect personal data which your relatives or other related persons may submit to us)
- Public authorities (e.g. gambling or sports betting licensing bodies, privacy authorities)
- Banks (e.g. to manage your fees)
- Insurance companies (e.g. in the event of a dispute or legal claim)
- External advisers (e.g. auditors or legal counsels)
- Other sources (such as suppliers and business partners and when communicating with them)

2.2 CATEGORIES OF PERSONAL DATA

We may process several categories of personal data about you. Examples: *identity, contact details, fees, bank details, appraisals, performance, absence, sick leave, administrative information, social situation, skills, education, preferences, audio and video material, office access data, business device management data, login details.*

We may process relevant sensitive categories of personal data such as biometric and health data, criminal offenses data or trade union membership data where this is necessary for us to handle or manage legal requirements, where this is necessary for a legal claim to be established, enforced or defended in a particular case or pertaining to certain data and where this is necessary in order to report a suspected crime to the police or for us to fulfil our legitimate interest or with your express consent.

You should not submit any communication or data for private purposes to us. If you do, we might get access to it. We do not read your private emails or messages except in exceptional cases where we suspect, for example, that internal rules relating to the use of IT resources have been breached.

2.3 WHY DO WE PROCESS YOUR PERSONAL DATA AND ON WHAT BASES?

The main reasons why we may need to process your personal data are:

- **Managing the engagement:** enter into consultancy/freelancer contracts, calculate and pay the fees, planning staffing, making travel arrangements, organising schedules, managing leave and producing reports and statistics, managing appraisals, skills, performance and formal procedures such as discipline and grievance.
- **Managing daily work:** using your name, work position etc. in our systems, managing user accounts and work equipment
- **Internal and external communication:** communicating internally and with any external party.
- **Security of office premises, tools and equipment:** issuing and managing entry passes, securing our IT systems and data, and video surveillance of our premises.
- **Handling and meeting legal requirements:** such as in the area of accounting, gambling or

- privacy laws, and taxation requirements or to establish, exercise, or defend legal claims.
- **To establish, exercise, or defend legal claim:** where this is necessary for a legal claim to be established, enforced or defended in a particular case or pertaining to certain data and where this is necessary in order to report a suspected crime to the police,

We process your personal data as described above, only:

- If necessary, to **fulfil legal obligations** (e.g. in the area of accounting, gambling or privacy laws, tax or if permitted by law or other grounds authorised by law (e.g. health data and diversity data)
- in order to **perform the consultancy/freelancer contract** (e.g. pay your fees)
- in order to **meet our legitimate interests** (e.g. to monitor usage of entry passes to ensure security, effective management and administration of the engagement, risk management and prevention and to maximise business reputation, performance and reach business objectives)
- if you give **your consent or express consent** (e.g. when required by law our processing of your personal data for marketing purposes will be based on your consent. Also, we process any communication or data for private purposes or special categories of personal data such as health data only if you submit such data to us voluntarily, thus with your consent or express consent. You should not submit such data to us unless we expressly ask you for it).

2.4 RECIPIENTS WE SHARE YOUR DATA WITH

We may share with internal recipients such as management, HR and other departments where necessary for their role. We may also share with different recipients such as other companies within the Catena Media group, external contacts, suppliers or partners, banks, public authorities, insurance companies, external advisers, regulators and authorities for the purposes described above.

2.5 WHERE DO WE PROCESS YOUR PERSONAL DATA?

We strive to process your personal data within the EU/EEA area so that you can feel confident that your data is adequately protected. However, your personal data may in some cases be transferred to and processed in a country outside the EU/EEA area by our service providers. For the ongoing protection of your personal data, we ensure that there are appropriate safeguards in place, such as data processing agreements or standard contractual clauses.

2.6 WE STORE YOUR DATA ONLY AS LONG AS IT IS REQUIRED

We store your personal data only as long as we need to in order to fulfil our purpose for processing it. We will then safely erase or anonymise your data so that it can no longer be linked to you.

We are using the following criteria to establish our retention period:

- (i) as long as we have an ongoing relationship with you (e.g. as a consultant or freelancer)
- (ii) as required by legal obligations to which we are subject (such as tax and accounting obligations); and
- (iii) as advisable considering our legal position (such as applicable statutes of limitations)

2.7 CHANGES TO THIS DOCUMENT

We may in the future be required to update the information in this document. When this happens, we will post the updated version on our intranet or site and, where applicable, notify you separately.

2.8 YOUR RIGHTS

You have certain rights connected to the personal data we store. You have the right to:

- request access to your personal data
- request rectification
- as applicable, revoke previously given consent with future effect
- object to processing which is based on our legitimate interests
- request that your personal data be erased or that the processing of your data be restricted in some cases
- be provided with a copy in a structured and machine-readable format (for data portability) of personal data which you have yourself submitted.
- obtain a copy of, or reference to, the safeguards under which your personal data is transferred outside of the European Economic Area.

2.9 FURTHER INFORMATION ABOUT HOW WE HANDLE YOUR PERSONAL DATA

If you have any questions about how we handle your personal data or wish to exercise any of your rights, please contact your *head of department* or privacy@catenamedia.com.

Should you not be happy with the answers you receive, you have the right to lodge a complaint with your local supervisory authority, however we appreciate the opportunity to deal with your concerns at first instance, therefore please refer to us with any comments or queries you may have.

3. FULL VERSION OF THE CONSULTANT/FREELANCER PRIVACY NOTICE

3.1 WHERE DO WE COLLECT PERSONAL DATA FROM?

We may collect personal data from:

Yourself

We collect and process the personal data you submit to us; e.g., in order to carry out follow-ups, evaluations and goal management (such as when carrying out and documenting staff appraisals) and to conduct surveys and to direct and distribute work (e.g., in connection with planning leaves of absence, as well as to communicate through our IT resources).

Relatives and other related persons

In the event of an accident or other emergency situation we may collect personal data which your relatives or other related persons may submit to us.

Public authorities

We collect and process personal data submitted to us by different authorities for the purposes of managing your fees, directing and distributing work (such as scheduling and handling tasks), handling and meeting legal requirements (e.g., in connection with a dispute or legal process) and fulfilling legal obligations (e.g., in connection licensing requirements).

Banks

We collect personal data which your bank or other payment service provider submits to us for the purpose of managing your fees.

Insurance companies

We collect and process personal data submitted to us by insurance companies for the purpose of managing your fees, for evaluation and security reasons and in order to handle and meet legal requirements (e.g., in connection with a dispute or legal process).

Other sources

In addition, we collect details about you submitted by parties other than those mentioned above, such as suppliers; e.g., when communicating with such parties.

3.2 CATEGORIES OF PERSONAL DATA

The table below describes the personal data we may collect about you:

Category	Example of personal data
<i>Engagement related data</i>	<ul style="list-style-type: none">• Engagement Details• Date of engagement• Form of engagement• Period of engagement• Measurement of working hours• Proof of eligibility to work e.g. visa details, passport• Work location• Work duties• Reason for leaving• Position• Degree of engagement• Title• References and referee details• Results of criminal checks• End date & reason for termination and exit interview and comments• Salary and remuneration data (of past employers or engagements)• Benefits data (of past employers or engagements)• Tax data

<p><i>Photos, videos, audio and other media material</i></p>	<ul style="list-style-type: none"> • Photograph • Recording • Video
<p>Demographic data</p>	<ul style="list-style-type: none"> • Anti-discrimination legislation (only collected where required by law (not for general D & I initiatives)) • Diversity in the work place (only collected where required by law (not for general D & I initiatives)) • Sex • Citizenship • Language • Race • Age
<p><i>Identity data</i></p>	<ul style="list-style-type: none"> • Full Name • User identity • IP address • National ID, passport, social security and/or tax numbers • Registration number • Signature
<p><i>Incident data</i></p>	<ul style="list-style-type: none"> • Incident <ul style="list-style-type: none"> ▪ Number ▪ Date ▪ Type of case • Information around: <ul style="list-style-type: none"> ▪ Security and personal data incidents

<i>Skills and development data</i>	<ul style="list-style-type: none"> • Education • Professional experience • Courses • Qualifications • Supporting training documentation • Certifications and licenses, including driving licenses
<i>Contact data</i>	<ul style="list-style-type: none"> • Address • Email address (business and personal) • Telephone/mobile number (business and personal) • Website and social media (e.g. LinkedIn) • Next of kin/your appointed ICE (In Case of Emergency contact)
<i>Salary and remuneration data</i>	<ul style="list-style-type: none"> • Bank account • Fees • Expenses
<i>Attendance and absence data</i>	<ul style="list-style-type: none"> • Other leave • Period worked • Absence due to sickness • Leave of absence
<i>Organisational information</i>	<ul style="list-style-type: none"> • Company or entity performing services for • Engagement status • Role and reporting lines • Operational department • Geographical placement • Cost centre • Organisation • Workplace adjustment
<i>Residence data</i>	<ul style="list-style-type: none"> • Location • Address

<i>Performance and evaluation data</i>	<ul style="list-style-type: none"> • Performance reviews and assessments • Grade • Reason • Feedback • Potential evaluation • Performance plans, progress, and achievements • Goals • Fulfilment of goals
<i>Personal preferences and survey data</i>	<ul style="list-style-type: none"> • Question • Answers, feedback (e.g. food or travel preferences) • Status • Date • Type of survey
<i>Consultant/Freelancer purchases data</i>	<ul style="list-style-type: none"> • Date • Type of purchase • Bank account • Amount • Reasoning
<i>CCTV, CCTV, Work equipment data and logs</i>	<ul style="list-style-type: none"> • CCTV • Inventory number • Type • Geo-location • App and website usage • IP address • Time stamp • Log entry • Passwords • Hardware Specifications • Installed applications • Available • Services
<i>Sideline occupations or conflicts of interest (unstructured data)</i>	<ul style="list-style-type: none"> • Sideline occupation • Conflict of interest • Type of sideline occupation • Type of conflict of interest

<i>Assets and liabilities</i>	<ul style="list-style-type: none"> • Shareholding data and type • Property and mortgages • Net worth and previous and current streams of income
<i>Social situation data</i>	<ul style="list-style-type: none"> • Civil status • Dependants, spouse, partner, family details, next kin • Relationships • Type of relationship • Family circumstances
<i>Health data</i>	<ul style="list-style-type: none"> • Data relating to health status • Disability, access, special requirements details
<i>Biometric data</i>	<ul style="list-style-type: none"> • Fingerprints

3.3 WHY DO WE PROCESS YOUR PERSONAL DATA AND ON WHAT BASES?

We have set out in the table below the reasons why we may process your personal data, the associated legal bases we rely upon to legally permit us to process your personal data, and the categories of personal data (identified in Section 3.2 above used for these purposes.

***You should not submit any sensitive data to us if we do not expressly ask you for it!** If you submit this voluntarily to us, processing will be based on your express consent.

****We may process relevant sensitive categories of personal data such as biometric and health data, criminal offenses data or trade union membership data where this is necessary for us to handle or manage legal requirements, where this is necessary for a legal claim to be established, enforced or defended in a particular case or pertaining to certain data and where this is necessary in order to report a suspected crime to the police or for us to fulfil our legitimate interest or with your express consent. See more below.**

Reasons (“processing purposes”)	Categories of data	Legal bases
MANAGE THE ENGAGEMENT RELATIONSHIP		
Manage the engagement , e.g., when: drawing up and entering consultancy/freelancer with you; storing basic information such as your name, position etc. in our systems; managing	<ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Contact data 	<p><i>Contract.</i> We are required to process your personal data to fulfil our contract with you.</p> <p><i>Legal Obligation.</i> The processing is necessary to fulfil legal obligations (e.g. in</p>

<p>user accounts and work equipment such as mobile phones; and managing changes in engagement conditions, including terminations of engagement and providing certificates of employment.</p>	<ul style="list-style-type: none"> • Residence data • Fees • Social situation data • Organisational information • Sideline occupations or conflicts of interest (unstructured data) • Photos, videos, audio and other media material 	<p>the area of gambling, privacy laws, tax or accounting,).</p>
<p>Managing fees, e.g., when calculating and paying your fees, collecting fee data, handling fee adjustments.</p>	<ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Contact data • Residence data • Fees • Attendance and absence data • Organisational information • Social situation data 	<p><i>Contract.</i> We are required to process your personal data to fulfil our contract with you.</p> <p><i>Legal Obligation.</i> The processing is necessary to fulfil legal obligations e.g. in the area of gambling, privacy laws, tax or accounting,).</p>
<p>Follow-ups, evaluations and goal management, e.g., when carrying out and documenting staff appraisals, documenting goals and producing reports and statistics.</p>	<ul style="list-style-type: none"> • Identity data, including national ID number or passport • Photos, videos, audio and other media material • Contact data • Residence data • Skills and development data • Organisational information • Performance and evaluation data • Social situation data • Participant data • Personal preference and survey data* 	<p><i>Legitimate interest.</i> Processing is necessary for us to fulfil our legitimate interest in following up and evaluating our staff to ensure goal management.</p>
<p>Carrying out surveys e.g., when sending out surveys and collecting and evaluating results from completed surveys.</p>	<ul style="list-style-type: none"> • Identity data • Photos, videos, audio and other media material • Contact data • Residence data • Demographic data • Organisational information • Participant data 	<p><i>Legitimate interest.</i> Processing is necessary for us to fulfil our legitimate interest in conducting surveys for the purpose of obtaining information about, e.g., how you and other staff members view the business and your and other staff members' work and engagement situation.</p>

	<ul style="list-style-type: none"> • Personal preference and survey data* 	
<p>Carrying out events and other staff activities e.g. for communicating event-related information and for registering participation and any food preferences.</p>	<ul style="list-style-type: none"> • Identity data, including national ID number or passport • Photos, videos, audio and other media material • Demographic data • Residence data • Contact data • Organisational information • Participant data • Personal preference and survey data* 	<p><i>Legitimate interest.</i> Processing is necessary for us to fulfil our legitimate interest in carrying out events.</p>
<p>CARRY OUT BUSINESS ACTIVITIES</p>		
<p>Directing and delegating work, e.g., in the case of business needs and staff planning, scheduling, planning annual leave and managing other forms of leave such as leaves of absence</p>	<ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Contact data • Residence data • Photos, videos, audio and other media material • Skills and development data • Performance and evaluation data • Fees • Attendance and absence data • Organisational information • Social situation data • Participant data 	<p><i>Contract.</i> We are required to process your personal data to fulfil our contract with you.</p> <p><i>Legitimate interest</i> Processing is necessary for us to fulfil our legitimate interest in carrying out business activities.</p>

<p>Managing the office premises, e.g., when managing room bookings and food orders, reporting any faults relating to the office premises, taking inventories, logging IT support cases and managing the post and delivery of parcels.</p>	<ul style="list-style-type: none"> • Engagement data • Photos, videos, audio and other media material • Identity data • Contact data • Residence • Organisational information • Attendance and absence data • CCTV, Work equipment data and logs • Incident data • Participant data • Personal preference and survey data* 	<p><i>Legitimate interest.</i> Processing is necessary for us to fulfil our legitimate interest in managing our office premises.</p>
<p>Documenting business activities, e.g., in connection with drawing up business documentation such as project documents.</p>	<ul style="list-style-type: none"> • Engagement data • Photos, videos, audio and other media material • Identity data • Contact data • Residence data • Organisational information • Skills and development data • Performance and evaluation data • Participant data 	<p><i>Legitimate interest.</i> Processing is necessary for us to fulfil our legitimate interest in documenting business activities.</p>
<p>Carrying out business changes, e.g., in connection with reorganisations, obtain and maintain licences, certification or other authorisations. Similarly, we process your personal data in connection with drawing up lists for turn-taking purposes and relocation and investigations.</p>	<ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Contact data • Residence data • Organisational information • Skills and development data • Performance and evaluation data • Fees • Photos, videos, audio and other media material • CCTV, Work equipment data and logs • Incident data • Participant data 	<p><i>Legitimate interest.</i> Processing is necessary for us to fulfil our legitimate interest in carrying out business changes.</p>

<p>Evaluating and following up on business activities such as producing reports and statistics; e.g., for projects and managing, investigating and following up on risk-assessment activities, including those which are security-related.</p>	<ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Contact data • Residence data • Benefits data • Skills and development data • Performance and evaluation data • Fees • Attendance and absence data • Organisational information • CCTV, Work equipment data and logs • Participant data • Incident data 	<p><i>Legitimate interest.</i> Processing is necessary for us to fulfil our legitimate interest in following up and evaluating business activities such as projects and risk assessment.</p>
<p>Carrying out business insight and business planning analyses, e.g., for producing reports and key statistics within related to, but not limited to, diversity, absence, staff turnover and work-related incidents.</p>	<ul style="list-style-type: none"> • Engagement data • Demographic data • Identity data • Contact data • Residence data • Photos, videos, audio and other media material • Skills and development data • Performance and evaluation data • Attendance and absence data • Organisational information • Social situation data • Work equipment data • Incident data • Participant data 	<p><i>Legitimate interest.</i> Processing is necessary for us to fulfil our legitimate interest in carrying out business insight and business planning analyses.</p>
<p>Obtain and maintain licenses, certifications or other authorizations from public authorities and bodies, e.g. affiliate or other relevant gaming licenses</p>	<p><i>This applies to Consultant/Freelancers in managerial positions only:</i></p> <ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Salary and remuneration data (of past employers or engagements) 	<p><i>Legitimate interest.</i> Processing is necessary for us to fulfil our legitimate interest in growing our business activities and brand by obtaining relevant licenses, certifications and accreditations .</p>

	<ul style="list-style-type: none"> • Benefits data (of past employers or engagements) • Residence data • Participant data • Tax data • Photos, videos, audio and other media material • Organisational information • Social situation data • Skills and development data • Performance and evaluation data • Sideline occupations or conflicts of interest (unstructured data) • Financial data • Assets and liabilities • Personal preference and survey data* • Biometric data, for ex fingerprints** • Trade union membership** • Health data** • Criminal offenses data** • Other info as might be required from public authorities or bodies 	<p><i>Legal obligation:</i> Processing is necessary for us to fulfil legal obligations, e.g., in relation to gambling registrations or authorizations.</p> <p><i>**The processing of any sensitive personal data, e.g. biometric, health data, crime offenses and trade union membership data relies on the same legal bases as the relevant processing.</i></p>
INTERNAL AND EXTERNAL COMMUNICATION		
<p>Facilitating staff communication e.g., for managing our digital address book containing Consultant/Freelancers' names and contact details and facilitating business related communication between Consultant/Freelancers.</p>	<ul style="list-style-type: none"> • Engagement data • Identity data • Contact data • Residence data • Photos, videos, audio and other media material • Benefits data • Skills and development data • Performance and evaluation data • Fees • Organisational information • Attendance and absence data 	<p><i>Legitimate interest</i> Processing is necessary for us to fulfil our legitimate interest in facilitating communication between staff.</p>

	<ul style="list-style-type: none"> • Consultant/Freelancer purchases data • Participant data • Personal preference and survey data* 	
<p>Business communication between staff and with external parties, e.g., when sending email to another Consultant/Freelancer or to an external party's email address.</p>	<ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Contact data • Residence data • Photos, videos, audio and other media material • Organisational information • Attendance and absence data • Skills and development data • Performance and evaluation data • Social situation data • CCTV, Work equipment data and logs • Consultant/Freelancer purchases data • Incident data • Participant data • Personal preference and survey data* • Health data** • Trade union membership data** • Criminal offenses data** 	<p><i>Legitimate interest</i> Processing is necessary for us to fulfil our legitimate interest in facilitating business communication between Consultant/Freelancers and with external parties.</p> <p><i>**The processing of any sensitive personal data, e.g. biometric, health data, crime offenses or trade union membership data relies on the same legal bases as the relevant processing</i></p>
<p>Internal communication about business activities and changes, e.g., when distributing information about the business via the various internal channels or when communicating information about staff changes.</p>	<ul style="list-style-type: none"> • Photos, videos, audio and other media material • Identity data • Contact data • Organisational information • Residence data • Skills and development data • Performance and evaluation data • Participant data 	<p><i>Legitimate interest</i> Processing is necessary for us to fulfil our legitimate interest in communicating business activities and changes and information about staff internally.</p>

	<ul style="list-style-type: none"> • Personal preference and survey data* 	
<p>External communication for the purpose of developing the brand, e.g., via our digital channels.</p>	<ul style="list-style-type: none"> • Photos, videos, audio and other media material • Engagement data • Identity data • Contact data • Residence data • Organisational information • Skills and development data • Performance and evaluation data • Participant data • Personal preference and survey data* 	<p><i>Legitimate interest</i> Processing is necessary for us to fulfil our legitimate interest in communicating externally for the purpose of developing our brand.</p> <p><i>Consent:</i> In some cases, our processing of your personal data for marketing purposes will be based on our legitimate interests. When required by law it will be based on your consent.</p>
<p>External communication about business activities and changes e.g., when publishing press releases and financial reports via external channels or when publishing names, pictures and contact details on external websites.</p>	<ul style="list-style-type: none"> • Photos, videos, audio and other media material • Engagement data • Identity data • Contact data • Residence data • Organisational information • Skills and development data • Performance and evaluation data 	<p><i>Legitimate interest</i> Processing is necessary for us to fulfil our legitimate interest in communicating our offers, business activities and changes externally.</p>
<p>External offer-related communication, e.g. about offers and other activities, including marketing, via our digital channels and various send-outs.</p>	<ul style="list-style-type: none"> • Photos, videos, audio and other media material • Engagement data • Identity data • Contact data • Residence data • Organisational information • Skills and development data 	<p><i>Legitimate interest</i> Processing is necessary for us to fulfil our legitimate interest in communicating externally for the purpose of distributing offers.</p> <p><i>Consent:</i> In some cases, our processing of your personal data for marketing purposes will be based on our legitimate interests. When required by law it will be based on</p>

	<ul style="list-style-type: none"> • Performance and evaluation data 	your consent.
<p>Staff communication for private purposes, e.g., so you can ask a colleague about lunch.</p> <p>You should not submit any communication or data for private purposes to us. If you do, we might get access to it. We do not read your private emails or messages except in exceptional cases where we suspect, e.g., that internal rules relating to the use of IT resources have been breached.</p>	<ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Contact data • Residence data • Photos, videos, audio and other media material • Organisational information • Social situation data • CCTV, Work equipment data and logs • Attendance and absence data • Skills and development data • Performance and evaluation data • Consultant/Freelancer purchases data • Incident data • Participant data • Personal preference and survey data* • Health data** • Criminal offenses data** 	<p><i>Legitimate interest:</i> Processing is necessary for us to fulfil our legitimate interest in facilitating communication between staff and in connection with investigations and for security reasons.</p> <p><i>Consent or Express consent:</i> We process any communication or data for private purposes or special categories of personal data such as health data only if you submit such data to us voluntarily, thus with your consent or express consent.</p>

SECURITY

<p>Investigative and security reasons, e.g., when registering access to the building, issuing entry badges or passes and managing access and permission rights to our IT resources. Similarly, we process your personal data in connection with logging and following up usage of our IT systems.</p> <p>Moreover, we may process your personal information for the purpose of monitoring compliance with our guidelines, policies and procedures and for investigating such matters.</p> <p>We may also, where necessary, process your personal data in connection with business-related incident management; e.g., in the case of security incidents or when carrying out security investigations.</p> <p>Similarly, we may handle your personal data in connection with engagement matters such as dealing with misconduct and, in rare cases, termination of engagement and investigations related to such matters.</p>	<ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Photos, videos, audio and other media material • Organisational information • Contact data • Residence data • Salary and remuneration data (of past employers or engagements) • Benefits data (of past employers or engagements) • Fees • Tax data • Social situation data • CCTV, Work equipment data and logs • Participant data • Attendance and absence data • Skills and development data • Performance and evaluation data • Consultant/Freelancer purchases data • Incident data • Personal preference and survey data* • Trade union membership** • Health data** • Criminal offenses data** 	<p><i>Legitimate interest</i> Processing is necessary for us to fulfil our legitimate interest in processing your data in connection with investigations and for security reasons.</p> <p><i>**The processing of any sensitive personal data, e.g. biometric, health data, crime offenses or trade union membership data relies on the same legal bases as the relevant processing</i></p>
<p>Video surveillance for the purposes of preventing, exposing and investigating crime but also of maintaining both your safety and ours. Video surveillance areas are clearly signposted Managing and securing IT systems and services.</p> <p>We process your data for the purpose of managing and securing our IT systems and services; e.g., when troubleshooting, making backup copies and managing</p>	<ul style="list-style-type: none"> • Photos, videos, audio and other media material 	<p><i>Legitimate interest</i> Processing is necessary for us to fulfil our legitimate interest in carrying out video surveillance for the purposes of preventing, exposing, and investigating crime.</p>

<p>system and application changes and problems. Similarly, we process your personal data in connection with logging IT system usage and managing IT incidents (e.g., in the case of an outage).</p>		
<p>Managing and securing our IT systems and services or example, for the purposes of understanding, diagnosing and troubleshooting, analysing information in our systems and databases to improve the way we run our business, and fix issues with our services, making backup copies and managing system and application changes and problems.</p>	<ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Salary and remuneration data (of past employers or engagements) • Benefits data (of past employers or engagements) • Contact data • Residence data • Tax data • Demographic data • Photos, videos, audio and other media material • Organisational information • Attendance and absence data • Skills and development data • Social situation data • Performance and evaluation data • Consultant/Freelancer purchases data • Incident data • CCTV, Work equipment data and logs • Participant data • Sideline occupations or conflicts of interest (unstructured data) • Assets and liabilities • Financial data • Personal preference and survey data* • Trade union membership** • Health data** 	<p><i>Legitimate interest:</i> Processing is necessary for us to fulfil our legitimate interest in managing, securing, developing, and ensuring continuity of our systems and services.</p> <p><i>**The processing of any sensitive personal data, e.g. biometric, health data, crime offenses or trade union membership data relies on the same legal bases as the relevant processing</i></p>

	<ul style="list-style-type: none"> • Biometric data, e.g. fingerprints** • Criminal offenses data** 	
HANDLING AND MEETING LEGAL REQUIREMENTS		
<p>To establish, exercise, or defend legal claims, e.g. in the case of a dispute or legal process and, similarly, when drawing up documentation such as pleas, statements and agreements.</p>	<ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Salary and remuneration data (of past employers or engagements) • Benefits data (of past employers or engagements) • Residence data • Tax data • Photos, videos, audio and other media material • Organisational information • Social situation data • Skills and development data • Performance and evaluation data • Consultant/Freelancer purchases data • CCTV, Work equipment data and logs • Incident data • Participant data • Trade union membership* • Health data* • Personal preference and survey data** • Criminal offenses data*** 	<p><i>Legitimate interest.</i> Processing is necessary for us to fulfil our legitimate interest in to establish, exercise, or defend legal claims.</p> <p><i>**The processing of any sensitive personal data, e.g. biometric, health data, crime offenses or trade union membership data relies on the same legal bases as the relevant processing</i></p>
<p>Fulfilling legal obligations, e.g. in the area of gambling, privacy laws, tax or accounting.</p> <p><i>Other legal obligations</i></p>	<ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Salary and remuneration data (of past employers or engagements) • Benefits data (of past employers or engagements) • Residence data • Tax data 	<p><i>Legal obligation.</i> Processing is necessary for us to fulfil those legal obligations which apply to the company.</p> <p><i>Legitimate interest.</i> Processing is necessary for us to fulfil our legitimate interest in to establish, exercise, or defend legal claims.</p>

<p>Moreover we process your data for the purpose of fulfilling other legal obligations such as complying with listing requirements and the market abuse regulation, accounting and bookkeeping requirements under accounting law, carrying out salary deductions resulting from enforcement Authority seizures and checking any qualifications required for engagement positions.</p>	<ul style="list-style-type: none"> • Photos, videos, audio and other media material • Organisational information • Social situation data • Skills and development data • Performance and evaluation data • Consultant/Freelancer purchases data • CCTV, Work equipment data and logs • Incident data • Participant data • Financial data • Assets and liabilities • Personal preference and survey data* • Trade union membership** • Health data** • Criminal offenses data** 	<p><i>**The processing of any sensitive personal data, e.g. biometric, health data, crime offenses or trade union membership data relies on the same legal bases as the relevant processing</i></p>
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3.4 RECIPIENTS WE SHARE INFORMATION WITH

When necessary, we may share your personal data with different recipients such as banks, suppliers, other organisations, public authorities, insurance companies and external advisers (see below). As a general rule, the recipient acts as data controller for their own processing of your personal data. For detailed information about which personal details we may share with different recipients and the legal basis for doing so, see [the table below](#):

**We may process relevant sensitive categories of personal data such as biometric and health data, criminal offenses data or trade union membership data where this is necessary for us to handle or manage legal requirements, where this is necessary for a legal claim to be established, enforced or defended in a particular case or pertaining to certain data and where this is necessary in order to report a suspected crime to the police or for us to fulfil our legitimate interest or with your express consent. See more below.

Categories of recipients	Categories of data	Legal bases
<p>Banks and other payment service providers</p>	<ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Contact data • Residence data • Fees • Organisational information • Social situation data • Consultant/Freelancer purchases data • Incident data • CCTV, Work equipment data and logs • Tax data 	<p><i>Contract.</i> We are required to process your personal data to fulfil our contract with you.</p> <p><i>Legal Obligation.</i> Processing is necessary to fulfil legal obligations (e.g. in the area of tax and accounting, engagement law and health and safety).</p> <p><i>**Processing of any sensitive personal data, e.g. biometric, health data, crime offenses and trade union membership data relies on the same legal bases as the relevant processing.</i></p>
<p>Suppliers and other third party vendors, which help manage our business and deliver services, e.g. payroll, corporate services, software suppliers.</p> <p>These companies may process your personal data only in accordance with our express instructions and may not use your data for their own purposes. They are also legally and contractually required to protect your personal data.</p>	<ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Contact data • Residence data • Fees • Salary and remuneration data (of past employers or engagements) • Benefits data (of past employers or engagements) • Tax data • Demographic data • Photos, videos, audio and other media material • Organisational information • Attendance and absence data • Skills and development data • Social situation data • Performance and evaluation data • Consultant/Freelancer purchases data • Incident data • CCTV, Work equipment data and logs 	<p><i>Contract.</i> We are required to process your personal data to fulfil our contract with you.</p> <p><i>Legal Obligation.</i> Processing is necessary to fulfil legal obligations (e.g. in the area of gambling, privacy laws, tax or accounting).</p> <p><i>Legitimate interest.</i> Processing is necessary for us to fulfil our legitimate interest in carrying out business activities, facilitating business communication between staff and between these and external parties and in connection with investigations and for security reasons.</p> <p><i>**Processing of any sensitive personal data, e.g. biometric, health data, crime offenses and trade union membership data relies on the same legal bases as the relevant processing.</i></p>

	<ul style="list-style-type: none"> • Participant data • Sideline occupations or conflicts of interest (unstructured data) • Assets and liabilities • Financial data • Personal preference and survey data • Trade union membership** • Health data** • Biometric data, e.g. fingerprints** • Criminal offenses data** 	
Customers , e.g. gaming operators or brokers	<ul style="list-style-type: none"> • Engagement data • Photos, videos, audio and other media material • Identity data • Contact data • Residence • Organisational information • Attendance and absence data • Incident data • Participant data • Personal preference and survey data 	<p><i>Legal Obligation.</i> Processing is necessary to fulfil legal obligations (e.g. with gambling or privacy laws).</p> <p><i>Legitimate interest.</i> Processing is necessary for us to fulfil our legitimate interest in carrying out business activities, facilitating business communication between staff and between these and external parties and in connection with investigations and for security reasons.</p>
Public authorities and certification bodies	<ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Salary and remuneration data (of past employers or engagements) • Benefits data (of past employers or engagements) • Residence data • Participant data • Tax data • Photos, videos, audio and other media material • Organisational information • Social situation data • Skills and development data • Performance and evaluation data • Sideline occupations or conflicts of interest (unstructured data) • Financial data 	<p><i>Legal obligation:</i> Processing is necessary for us to fulfil legal obligations (e.g., in relation to gambling registrations or authorization).</p> <p><i>Legitimate interest.</i> Processing is necessary for us to fulfil our legitimate interest in developing our brand and business activities by obtaining relevant licenses, certifications, and accreditations. Further, processing may also be necessary in connection with investigations and for us fulfil our legitimate interest to establish, exercise, or defend legal claims (e.g. involving the police with regard to criminal investigations or the courts, in connection with a claim or legal process).</p> <p><i>**Processing of any sensitive personal data, e.g. biometric, health data, crime offenses and trade union membership data relies on the same legal</i></p>

	<ul style="list-style-type: none"> • Assets and liabilities • Personal preference and survey data • Biometric data, for ex fingerprints** • Trade union membership** • Health data** • Criminal offenses data** • Other info as might be required from public authorities or bodies. 	<p><i>bases as the relevant processing.</i></p>
<p>Company healthcare or public authorities and health care</p>	<ul style="list-style-type: none"> • Engagement data • Identity data, including personal number • Contact data • Fees • Attendance and absence data • Organisational information • Social situation data • Tax data • Biometric data, for ex fingerprints** • Health data** • Criminal offenses data** 	<p><i>Vital interest: Processing is necessary to protect the vital interests of you (e.g. medical urgency situation)</i></p> <p><i>Legitimate interest</i> Processing is necessary for us to fulfil our legitimate interest in testing staff and carrying out checks where the job requires this.</p> <p><i>**Processing of any sensitive personal data, e.g. biometric, health data, crime offenses and trade union membership data relies on the same legal bases as the relevant processing.</i></p>
<p>External advisers, e.g. accountancy agencies where accounting is concerned or law firms or other legal agencies in connection with an engagement matter or the handling of a legal claim or process</p>	<ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Salary and remuneration data (of past employers or engagements) • Benefits data (of past employers or engagements) • Fees • Residence data • Participant data • Tax data • Photos, videos, audio and other media material • Organisational information • Social situation data • Skills and development data • Performance and evaluation data • Sideline occupations or conflicts of interest (unstructured data) • Financial data 	<p><i>Contract.</i> We are required to process your personal data to fulfil our contract of engagement with you.</p> <p><i>Legal Obligation.</i> Processing is necessary to fulfil legal obligations (e.g. in the area of health and safety or gambling and privacy laws).</p> <p><i>Legitimate interests:</i> Processing is necessary for us to fulfil our legitimate interest in carrying out business activities, facilitating business communication between staff and between these and external parties and in connection with investigations and for security reasons. Processing may be further necessary for us to fulfil our legitimate interest in to establish, exercise, or defend legal claims.</p> <p><i>**Processing of any sensitive personal data, e.g.</i></p>

	<ul style="list-style-type: none"> • Assets and liabilities • Personal preference and survey data • Biometric data, for ex fingerprints** • Trade union membership** • Health data** • Criminal offenses data** • Other info as might be required from public authorities or bodies. 	<p><i>biometric, health data, crime offenses and trade union membership data relies on the same legal bases as the relevant processing.</i></p>
<p>Hotel and conference facilities and travel agencies, e.g. when booking business trips.</p>	<ul style="list-style-type: none"> • Identity data, including national ID number or passport • Photos, videos, audio and other media material • Demographic data • Residence data • Contact data • Organisational information • Participant data • Personal preference and survey data • Health data** 	<p><i>Legitimate interest. Processing is necessary for us to fulfil our legitimate interest in carrying out business activities and events.</i></p> <p><i>**Processing of any sensitive personal data, e.g. biometric, health data, crime offenses and trade union membership data relies on the same legal bases as the relevant processing.</i></p>
<p>Potential purchasers and vendors, e.g. in connection with a business change involving a transfer of all or part of the business.</p>	<ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Salary and remuneration data (of past employers or engagements) • Benefits data (of past employers or engagements) • Residence data • Participant data • Tax data • Photos, videos, audio and other media material • Organisational information • Social situation data • Skills and development data • Performance and evaluation data • Sideline occupations or conflicts of interest (unstructured data) • Financial data • Assets and liabilities 	<p><i>Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest in completing the sale or merger.</i></p> <p><i>**Processing of any sensitive personal data, e.g. biometric, health data, crime offenses and trade union membership data relies on the same legal bases as the relevant processing.</i></p>

	<ul style="list-style-type: none"> • Personal preference and survey data • Biometric data, for ex fingerprints** • Trade union membership** • Health data** • Criminal offenses data** • Other info as might be required from public authorities or bodies. 	
<p>Other Catena Media group companies</p> <p>Transfers within the group shall be made according to an intra-group data transfer agreement.</p>	<ul style="list-style-type: none"> • Engagement data • Identity data, including national ID number or passport • Salary and remuneration data (of past employers or engagements) • Benefits data (of past employers or engagements) • Residence data • Participant data • Tax data • Photos, videos, audio and other media material • Organisational information • Social situation data • Skills and development data • Performance and evaluation data • Sideline occupations or conflicts of interest (unstructured data) • Financial data • Assets and liabilities • Personal preference and survey data • Biometric data, for ex fingerprints** • Trade union membership** • Health data** • Criminal offenses data** • Other info as might be required from public authorities or bodies. 	<p><i>Contract.</i> We are required to process your personal data to fulfil our contract of engagement with you.</p> <p><i>Legal obligation:</i> Processing is necessary for us to fulfil legal obligations, e.g., in relation to gambling or privacy registrations or authorization.</p> <p><i>Legitimate interest.</i> Processing is necessary for us to fulfil our legitimate interests in carrying out business activities, facilitating business communication between staff and between these and external parties and in connection with investigations and for security reasons. Processing may be further necessary for us to fulfil our legitimate interest in to establish, exercise, or defend legal claims.</p> <p><i>**Processing of any sensitive personal data, e.g. biometric, health data, crime offenses and trade union membership data relies on the same legal bases as the relevant processing.</i></p>

3.5 HOW LONG DO YOU STORE MY PERSONAL DATA?

We store your personal data only as long as we need to in order to fulfil our purpose for processing it. We will then safely erase or anonymise your data so that it can no longer be linked to you.

We are using the following criteria to establish our retention period:

- (i) as long as we have an ongoing relationship with you as a Consultant/Freelancer;
- (ii) as required by legal obligations to which we are subject (e.g. in the area of gambling, privacy laws, tax or accounting); and
- (iii) as advisable in light of our legal position (such as applicable statutes of limitations/periods of prescription).

Your personal data may be held for:

- (i) a longer or shorter period where there is a legal or regulatory reason to do so (in which case it will be erased or anonymised when no longer required for the legal or regulatory purpose); or
- (ii) a shorter period where you object to the processing and there is no longer a legitimate purpose to process the personal data.

3.6 WHERE DO WE PROCESS YOUR PERSONAL DATA?

Your personal data will be processed in your country of engagement and may be transferred to affiliates within Catena Media. If you were hired to work in the EU/EEA, we always strive to process your personal data within the EU/EEA area so that you can feel confident that your data is adequately protected. However, your personal data may in some cases be transferred to and processed in a country outside the EU/EEA area by our service providers. For the ongoing protection of your personal data, we always ensure that there are safeguards in place such as data transfer agreements, which require recipients to protect data in the same way as we do. Information about the countries to which we, where appropriate, transfer your personal data and the safeguards implemented can be obtained upon request.

3.7 YOUR RIGHTS

You have a number of rights in relation to your personal data. More information about each of these rights can be found by referring to the table set out further below.

To exercise your rights you may contact us as by sending an email to privacy@catenamedia.com or in writing to Catena Media at the address set out in Section 1 above.

Please note the following if you wish to exercise your rights:

Right	What this means
Access	You can ask us to: <ul style="list-style-type: none">● confirm whether we are processing your personal data;

	<ul style="list-style-type: none"> ● give you a copy of that data; ● provide you with other information about your personal data, e.g. what data we have, what we use it for, who we disclose it to, whether we transfer it outside the EU and how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any Automated Decision Making or Profiling, to the extent that information has not already been provided to you in this Privacy Notice.
Rectification	<p>You can ask us to rectify inaccurate personal data. We may seek to verify the accuracy of the data before rectifying it.</p>
Erasure	<p>You can ask us to erase your personal data, but only where:</p> <ul style="list-style-type: none"> ● it is no longer needed for the purposes for which it was collected; or ● you have withdrawn your consent (where processing was based on consent); or ● following a successful right to object (see 'Objection' below); or ● it has been processed unlawfully; or ● to comply with a legal obligation. <p>We are not required to comply with your request to erase your personal data if the processing of your personal data is necessary for, among other things:</p> <ul style="list-style-type: none"> ● compliance with a legal obligation; or ● the establishment, exercise or defence of legal claims; <p>There are certain other circumstances in which we are not required to comply with your erasure request, although these two are the most likely circumstances in which we would deny that request</p>
Restriction	<p>You can ask us to restrict (i.e. keep but not use) your personal data, but only where:</p> <ul style="list-style-type: none"> ● its accuracy is contested (see Rectification), to allow us to verify its accuracy; or ● the processing is unlawful, but you do not want it erased; or ● it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or ● you have exercised the right to object, and verification of overriding grounds is pending. <p>We can continue to use your personal data following a request for restriction, where:</p> <ul style="list-style-type: none"> ● we have your consent; or

	<ul style="list-style-type: none"> ● to establish, exercise or defend legal claims; or ● to protect the rights of another natural or legal person.
Portability	<p>You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it 'ported' directly to another Data Controller, but in each case only where:</p> <ul style="list-style-type: none"> ● the processing is based on your consent or on the performance of a contract with you; and ● the processing is carried out by automated means.
Objection	<p>You can object to any processing of your personal data which has our 'legitimate interests' as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests. We have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.</p>
International Transfers	<p>You can ask to obtain a copy of, or reference to, the safeguards under which your personal data is transferred outside of the European Economic Area. We may redact data transfer agreements or related documents (i.e. obscure certain information contained within these documents) for reasons of commercial sensitivity.</p>

3.8 CHANGES TO THIS DOCUMENT

We may in the future be required to update the information in this document. When this happens, we will post the updated version on our intranet or site and, where applicable, notify you separately.

3.9 WHO DO I CONTACT IF I HAVE QUESTIONS?

If you have any questions about how we handle your personal data or wish to exercise any of your rights, please contact your head of department or privacy@catenamedia.com.

Should you not be happy with the answers you receive, you have the right to lodge a complaint with the local supervisory authority in your country of engagement.
