

1. POLICY STATEMENT

- 1.1 Everyone has rights with regard to the way in which their personal data is handled. During the course of our activities, we will collect, store and process personal data relating to journalists and others for our media relation services (**Services**), and we recognise that the correct and lawful treatment of this personal data will maintain confidence in our organisation and will facilitate successful business operations.
- 1.2 Data users are obliged to comply with this policy when processing personal data on our behalf. Any breach of this policy may result in disciplinary action.

2. ABOUT THIS POLICY

- 2.1 The types of personal data that APO Group (**We**) may be required to handle include information about current, past and prospective journalists and other editorial and media contacts and public relations professionals that we communicate with. The personal data, which may be held on paper or on a computer or other media, is subject to certain legal safeguards.
- 2.2 This policy and any other documents referred to in it sets out the basis on which we will process any personal data we collect from Data Subjects, or that is provided to us by Data Subjects or other sources.
- 2.3 This policy does not form part of any employee's contract of employment and may be amended at any time.
- 2.4 This policy sets out rules on data protection and the legal conditions that must be satisfied when we obtain, handle, process, transfer and store personal data for the Services.
- 2.5 Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to Michelle Scott, VP Business Enablement, at +41 41 562 05 83 or at privacy@apo-opa.com

3. DEFINITION OF DATA PROTECTION TERMS

- 3.1 **Data** is information, which is stored electronically, on a computer, or in certain paper-based filing systems.
- 3.2 **Data subjects** for the purpose of this policy include journalists, other editorial and media contacts and all other individuals about whom we hold personal data. All data subjects residing in the European Union have legal rights in relation to their personal information.
- 3.3 **Personal data** means data relating to an individual who can be identified from that data (or from that data and other information in our possession).
- 3.4 **Data controllers** are the people who or organisations which determine the purposes for which, and the manner in which, any personal data is processed. We are the data controller of all personal data collected stored and processed for our Services.
- 3.5 **Data users** are those of our employees whose work involves processing personal data. Data users must protect the data they handle in accordance with this data protection policy and any applicable data security procedures at all times.
- 3.6 **Data processors** include any person or organisation that is not a data user that processes personal data on our behalf and on our instructions. Employees of data controllers are excluded from this definition, but it could include suppliers which handle personal data on our behalf.
- 3.7 **Processing** is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.
- 3.8 **Schedule** at the end of this document summarises data processing activities.

4. DATA PROTECTION PRINCIPLES

- 4.1 Anyone processing personal data must comply with the eight enforceable principles of good practice. These provide that personal data must be:
- (a) Processed fairly and lawfully.
 - (b) Processed for limited purposes and in an appropriate way.
 - (c) Adequate, relevant and not excessive for the purpose.
 - (d) Accurate.
 - (e) Not kept longer than necessary for the purpose.
 - (f) Processed in line with data subjects' rights.
 - (g) Secure.
 - (h) Not transferred to people or organisations without adequate protection.

5. FAIR AND LAWFUL PROCESSING

- 5.1 GDPR is not intended to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the data subject.
- 5.2 For personal data to be processed lawfully, it must be processed on the basis of one of the legal grounds set out in the GDPR. These include, among other things, the data subject's consent to the processing, or that the processing is necessary for the performance of a contract with the data subject, for the compliance with a legal obligation to which the data controller is subject, or for the legitimate interest of the data controller or the party to whom the data is disclosed.
- 5.3 When we collect and process personal data, we do so only in the pursuit of and in accordance with the real and present legitimate interests of our business and taking into consideration the fundamental rights and freedoms of the relevant data subjects, in particular:
- (a) our collection and processing of personal data is limited to the specific purposes set out in the Schedule or to any other purposes specifically permitted by the GDPR;
 - (b) data subjects have the right to request that we not collect and process their personal data at any time in accordance with this policy.

6. PROCESSING FOR LIMITED PURPOSES

- 6.1 In the course of our business, we may collect and process the personal data set out in the Schedule. This may include data we receive directly from a data subject (for example, by completing forms or by corresponding with us by mail, phone, email or otherwise) and data we receive from other sources (including, for example, social media accounts, publisher websites, business partners and others).
- 6.2 We will only process personal data for the specific purposes set out in the Schedule or for any other purposes specifically permitted by GDPR.

7. DEALING WITH SUBJECT ACCESS REQUESTS

- 7.1 Data subjects must make a formal request for information we hold about them. This should be made in writing and we have a dedicated email address for this purpose which is accessrequest@responsesource.com. Employees who receive a written request directly should forward it to their line manager immediately.
- 7.2 When receiving telephone enquiries, we will only disclose personal data we hold on our systems if the following conditions are met:
- We will check the caller's identity to make sure that information is only given to a person who is entitled to it.
 - We will suggest that the caller put their request in writing if we are not sure about the caller's identity and where their identity cannot be checked.
- 7.3 Our employees will refer a request to their line manager for assistance in difficult situations. Employees should not be bullied into disclosing personal information.

8. ADEQUATE, RELEVANT AND NON-EXCESSIVE PROCESSING

We will only collect personal data to the extent that it is required for the specific purpose of the conduct of our business.

9. ACCURATE DATA

We will ensure that personal data we hold is accurate and kept up to date. We will check the accuracy of any personal data at the point of collection and at regular intervals afterwards. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

10. TIMELY PROCESSING

We will not keep personal data longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all data which is no longer required.

11. PROCESSING IN LINE WITH DATA SUBJECT'S RIGHTS

We will process all personal data in line with data subjects' rights, in particular their right to:

- (a) Request access to any data held about them by a data controller (see also clause 7);
- (b) Prevent the processing of their data for direct-marketing purposes;
- (c) Ask to have inaccurate data amended (see also clause 9); and
- (d) Prevent processing that is likely to cause damage or distress to themselves or anyone else.

12. DATA SECURITY

- 12.1 We take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.
- 12.2 We have put in place organisational and technical measures to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be transferred to a data processor if he agrees to comply with those organisational and technical measures, or if he puts in place adequate measures himself.

- 12.3 We will maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows:
- (a) **Confidentiality** means that only people who are authorised to use the data can access it.
 - (b) **Integrity** means that personal data should be accurate and suitable for the purpose for which it is processed.
 - (c) **Availability** means that authorised users should be able to access the data if they need it for authorised purposes. Personal data will normally be stored on our central computer system instead of individual PCs.
- 12.4 Security procedures include:
- (a) **Data encryption.** All documents containing personal data are encrypted.
 - (b) **Safe Storage.** All documents containing personal data are stored using reasonable security.

13. TRANSFERRING PERSONAL DATA TO A COUNTRY OUTSIDE THE EEA

- 13.1 We may transfer any personal data we hold to a country outside the European Economic Area (**EEA**), provided that one of the following conditions applies:
- (a) The country to which the personal data are transferred ensures an adequate level of protection for the data subjects' rights and freedoms.
 - (b) The data subject has given his consent.
 - (c) The transfer is necessary for one of the reasons set out in the GDPR, including the performance of a contract between us and the data subject, or to protect the vital interests of the data subject.
 - (d) The transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims.
 - (e) The transfer is authorised by the relevant data protection authority where we have adduced adequate safeguards with respect to the protection of the data subjects' privacy, their fundamental rights and freedoms, and the exercise of their rights.

- 13.2 Subject to the requirements in clause 12.1 above, personal data we hold may also be processed by staff operating outside the EEA who work for us or for one of our suppliers under strict non-disclosure measures and with all reasonable security procedures.

14. DISCLOSURE AND SHARING OF PERSONAL INFORMATION

- 14.1 We may share personal data we hold with any member of our company.
- 14.2 We may also disclose personal data we hold to third parties:
- (a) In the event that we sell or buy any business or assets, in which case we may disclose personal data we hold to the prospective seller or buyer of such business or assets.
 - (b) If all or substantially all of our assets are acquired by a third party, in which case the personal data we hold in the Services will be one of the transferred assets.
- 14.3 If we are under a duty to disclose or share a data subject's personal data in order to comply with any legal obligation, or in order to enforce or apply any contract with the data subject or other agreements; or to protect our rights, property, or safety of our employees, customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- 14.4 We may also share personal data we hold with selected third parties for the purposes set out in the Schedule.

15. CHANGES TO THIS POLICY

We reserve the right to change this policy at any time. Where appropriate, we will notify data subjects of those changes by mail or email.

Schedule of Data Processing, APO Group

Category of data subject?	Current, former and prospective freelancers, partners, suppliers and other contractors who are not employees
What personal data is processed?	Name; addresses; telephone numbers; email addresses; bank details;
What is the source of the personal data?	The data subject
Who is the information shared with?	N/A
Where is the information stored and processed?	Worldwide
Purpose(s) for processing	Maintenance of records of services provided by the data subject to the data controller; Payment of service fees for services provided by the data subject to the data controller; Complying with legal requirements and other purposes directly connected with the data subject's provision of services to the data controller
Retention period	Personal data deleted six years after the completion of the services provided by the data subject to the data controller
Legal basis for processing	Article 6(1)(b) – contract

Category of data subject?	Current, former and prospective clients and customers (including Public relations and marketing professionals)
What personal data is processed?	Name; telephone numbers; email addresses;
What is the source of the personal data?	The data subject or other third party sources (including publicly available sources)
Who is the information shared with?	N/A
Where is the information stored and processed?	Worldwide
Purpose(s) for processing	Processing orders for services provided by the data controller to the data subject; Maintenance of records of services provided by the data controller to the data subject; Processing of fees for services provided by the data controller to the data subject; Direct marketing; Other purposes directly connected with the data controller's provision of services to the data subject
Retention period	Personal data deleted six years after the completion of the services provided by the data controller to the data subject
Legal basis for processing	Article 6(1)(b) – contract (current and former clients and customers) and Article 6(1)(f) – legitimate interests (former and prospective clients and customers)

Category of data subject?	Journalists and other editorial and media contacts
What personal data is processed?	Name; addresses; telephone numbers; email addresses; Other information relating to the profession of the data subject;
What is the source of the personal data?	The data subject or other third party sources (including publicly available sources)
Who is the information shared with?	N/A
Where is the information stored and processed?	Worldwide
Purpose(s) for processing	Sending journalists adequate news releases and other content, inform them of interviews opportunities.
Retention period	Until: (a) the data subject ceases to be professionally active for a significant period; or (b) the data subject requests the removal of his or her personal data
Legal basis for processing	Article 6(1)(f) – legitimate interests (of the controller and its clients or customers)