

## Recruitment Privacy policy

Effective date: 1st July 2020

### Overview

We take your privacy extremely seriously. This policy relates only to the recruitment services provided via this website, and describes what personal data we collect, why and how we collect it, who we share it with, and how you can contact us if you have any queries or concerns about this information. It also describes your data protection rights (as applicable), including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the Privacy Rights sections below.

Please note that other companies in the Sony Group operate a range of other websites, including recruitment. These companies have their own privacy policies, which are generally available from the relevant websites for those products and services.

This website is operated by Sony Corporation on behalf of Sony Europe B.V., Sony Corporation of America, Sony Electronics Inc., Sony India Software Center Pvt Ltd. and their affiliates (“Sony”).

### Information we collect

What sort of data do we collect?

Sony collects personal data about you to help in the recruitment process. The exact data we collect during the recruitment process can differ depending on the country in which the job is located, and any specifically necessary data will be made clear to you throughout the process. Such personal data may consist of:

- **Contact information:** such as your name, address, e-mail address, phone number and other contact media.
- **Identification and immigration information:** such as your date of birth, passport number, government identification numbers (e.g. social security numbers), and details of your eligibility to work.
- **CV/Resume and application information:** such as your education history and work history, other information you choose to provide in social media and in your CV/Resume and your responses to questions presented in the website, background checks, including criminal record checks, security vetting, credit history and other details of your application.

Personal data about you provided by third parties

The following third parties may provide personal data about you:

- Recruitment agencies that you have selected to search for jobs and submit job applications on your behalf may provide us all the above information about you;
- Third parties that you have selected to provide your references may provide information on your time and performance at previous employment
- Organisations approved to undertake criminal records checks, governmental bodies authorised to provide the criminal records;
- Publicly available sources which we use to confirm the information you provide as part of your application

Do we collect any sensitive personal data?

We do collect and process sensitive personal data where it is necessary for the recruitment process and in compliance with all applicable legislation, specifically:

- Social Security Number (or other Government ID)
- Racial/ethnic origin
- Passport number
- Criminal record
- Gender (U.S. only)
- Disability (U.S. only)
- Veteran status (U.S. only)

We will explain, when this is collected, whether and why this data is mandatory and our legal basis for the collection.

How do we use the information we collect?

We use the information we collect:

- Where necessary for Sony's legitimate interests, as listed below, and where not overridden by your data protection rights:
  - receiving and reviewing job applications;
  - administering and managing your registrations and job applications;
  - recruiting and selecting staff for roles we have advertised and for which you have applied;
  - protecting our legitimate business interests and legal rights. This includes, but is not limited to, use in connection with legal claims, compliance, regulatory, auditing, investigative and disciplinary purposes (including disclosure of such

information in connection with legal process or litigation) and other ethics and compliance reporting requirements.

- Where this is necessary for Sony to administer any future contract of employment and employment record;
- Where necessary to comply with a legal obligation:
  - meeting requirements to ensure you are eligible to work under local laws, including immigration laws;
  - making deductions from payroll for tax and social security purposes and providing information to tax and social security authorities, as required by law and where you have successfully obtained a role at Sony.
- Where you have given your consent (Where we ask for consent, you are free to withhold or revoke it):
  - send you alerts about new roles at Sony.

### Sharing information about you

Your personal data will be shared as follows:

- We share some of your personal data with **other Sony Group companies, which operate in various countries** (including, for example, the U.S., Japan, and India) to administer and manage group functions, including to manage your registration on the website and your application for a role at Sony.
- Your personal data will also be shared with **companies providing services under contract** to the Sony Group, such as Workday (in the U.S.), the IT provider of this recruitment portal, and recruitment agencies supporting our recruitment process. [what about any other service providers, like ADP, auditors or other?]
- Personal data will also be shared with **government authorities and/or law enforcement officials** if required for the purposes above, if mandated by law or if required for the protection of our legitimate interests in compliance with applicable laws.

### International Transfers of your personal data

Sony is a global organisation. For the purposes explained in this policy, your information may be transferred to other companies within the Sony Group and 3rd parties in countries such as the U.S. and Japan, which may not have the same level of protection laws as those in the country in which you are located. Details of the recipients are provided in the 'Sharing information about you' section.

When making international transfers out of the EU we use standard contractual data protection clauses, which have been approved by the European Commission. For further information, including to obtain a copy of the documents used to protect your information, please contact us as described in the Contacting Us section below.

### How is this data safeguarded?

We take commercially reasonable steps to protect your personal information. This includes setting up processes and procedures to minimise unauthorised access to or disclosure of your information, and we use reasonable efforts to obtain the agreement of Sony Group companies and third-party service providers to take steps to protect the confidentiality, security, and integrity of personal information we share with them. However, no electronic data transmission or storage of information can be guaranteed to be 100% private and secure.

### Retention

We will retain your personal data only for as long as we need it for Sony's legitimate interest in accordance with applicable law, to fulfil your application and any following employment contract or to meet a legal requirement, after which we will take steps to delete your personal data or hold it in a form that no longer identifies you.

### Notice Regarding "Do Not Track" Signals

"Do Not Track" Signals. Your browser settings may allow you to automatically transmit a so called "Do Not Track" signal to websites and online services you visit. Sony currently does not alter its practices when it receives a "Do Not Track" signal. More information is available at <http://www.allaboutdnt.com>. Also note that third parties may collect personal data about your online activities over time and across different websites when you visit our websites or other online websites and services.

### EU Privacy Rights Notice

You have the right to **ask Sony for a copy** of your personal data; to **correct, delete** or **restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide in a structured, machine readable format**. In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement). Where we have asked for your consent, you may **withdraw consent** at any time. If you ask to withdraw your consent to Sony processing your data, this will not affect any processing which has already taken place at that time.

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep. If you have unresolved concerns, you have the **right to complain** to a data protection authority.

### Australia Privacy Rights Notice

In relation to Section “International transfers of your data” above, we will disclose your personal data to parties in a number of countries, including the United States of America, Japan, and the United Kingdom. From time to time we will need to disclose your personal data to parties in other countries not on this list. This will be on an ad hoc or case by case basis and for the purposes for which we collected your personal data.

**Complaints:** If you are concerned that we have not complied with your legal rights or applicable privacy laws, you may bring a complaint internally through our complaints process or you may decide to make a formal complaint with the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)) (which is the regulator responsible for privacy in Australia). We will deal with complaints as follows:

- **Step 1: let us know**  
If you would like to make a complaint, let us know by using the details set out in the Contacting Us section below.
- **Step 2: investigation of complaint**  
Your complaint will be investigated. A response to your complaint will be given in writing within a reasonable period.
- **Step 3: contact OAIC**  
We expect that our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also contact the Office of the Australian Information Commissioner as follows:
  - Office of the Australian Information Commissioner (OAIC)
  - Complaints must be made in writing
  - Tel: 1300 363 992
  - Adresse: Director of Compliance  
Office of the Australian Information Commissioner  
GPO Box 5218  
Sydney NSW 2001
  - Web: [www.oaic.gov.au](http://www.oaic.gov.au)

#### New Zealand Privacy Rights Notice

Nothing herein shall limit the rights of customers under the Privacy Act 1993. All instructions regarding your data and queries from you will be followed up and answered by us as soon as possible.

#### Malaysia Privacy Rights Notice

In view of the implementation of the Personal Data Protection Act 2010 (“Act”), Sony recognises the need to process all personal data obtained in a lawful and appropriate manner. The legal responsibility for compliance with the Act lies with Sony, which is the “data user” under the Act. Compliance with this Privacy Policy and the Act is the responsibility of all employees of Sony. As and when Sony is required to collect personal data, Sony and its employees must abide by the requirements of this Privacy Policy and the Act. In the context of the Act, “processing” is defined as including the collection, recording, holding or storing of personal data which includes, inter alia, NRIC numbers, home address and contact details.

A data subject has the following rights under the Act:

- i. Request for access to personal data held on the individual, the purpose for which the personal data is being used and those to whom it has, or can be disclosed;
- ii. Prevent data processing that is likely to cause distress or damage;
- iii. Take reasonable action to stop the use of, rectify, erase, and/or dispose of inaccurate personal data; and
- iv. Withdraw consent given to Sony.

Any individual who intends to exercise the abovementioned rights or has any inquiries regarding this Privacy Policy should make a written request to Sony at the details set out in the Contacting Us section below. Sony will generally be able to respond to such queries and/or requests within 30 days.

#### Singapore Privacy Rights Notice

Sony collects, uses, discloses, manages and handles Personal Data that is subject to the Personal Data Protection Act 2012 (No. 26 of 2012) (“the Act”). Please read this Privacy Policy carefully. By accessing our website, using any services provided by Sony, signing up for any products and services provided by Sony, submitting any information to us, or otherwise showing your agreement thereon, you will be deemed to have agreed and consented to the terms of this Data Protection Policy.

“Personal Data” means any data, whether true or false, which can be related to a specific identifiable individual, whether such individual is identifiable from the data itself, or from other information that is available to Sony. Personal Data includes the personal data collected, used, disclosed, managed and handled in accordance with this Privacy Policy.

If you (a) have any questions or feedback relating to your Personal Data or our Privacy Policy, (b) would like to withdraw your consent to any use of your Personal Data as set out in this Privacy

Policy or otherwise, or (c) would like to gain access or make corrections to your Personal Data records, please contact us using the details in the Contacting Us section below.

Sony will generally be able to respond to such queries and/or requests within 30 days.

If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, Sony may not be able to continue to provide its products and/or services to you.

### United States Privacy Rights Notice

California:

If you reside in California, we are required to provide additional information to you about the categories of personal information we collect and the purposes for which the categories of personal information will be used.

Consistent with the "Information we collect" section above, we may collect the following categories of information about California residents ("CA Personal Information"):

- **Personal Identifiers**, including your name, date of birth, address, e-mail address, phone and other contact media, or information you choose to provide in social media.
- **Other Identifiers**, such as your social security number, passport number, driver's license or state identification card number. .
- **Characteristics of protected classifications under California or federal law**, including racial/ethnic origin, veteran status, gender and disability.
- **Professional or employment-related information**, including your work history, your time and performance at previous employment, information included in your CV/resume, responses to questions presented in the application.
- **Education information**, including your education history.
- **Other information**, such as background checks, including criminal record checks, security vetting, credit history, inferences drawn from any of the information collected, and other details of your eligibility to work.

Consistent with the "How do we use the information we collect?" section above, we may use CA Personal Information for the following business purposes:

- To receive and review job applications

- To administer and manage your registrations and job applications
- To recruit and select staff for roles we have advertised and for which you have applied
- To ensure our legitimate business interests and legal rights. This includes, but is not limited to, use in connection with legal claims, compliance, regulatory, auditing, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation) and other ethics and compliance reporting requirements.
- To meet requirements to ensure you are eligible to work under local laws including immigration laws
- To make deductions from payroll for tax and social security purposes and providing information to tax and social security authorities, as required by law and where you have successfully obtained a role at Sony
- To send you alerts about new roles at Sony (where you have given consent)

### Children

To submit a job application via this website you must be 18 years of age or older. If you are under 18 and wish to apply for a job that is advertised on this website, please contact us directly by using the details in the Contacting Us section below. If you are under 16 years of age, please ask your parent or legal guardian to contact us.

### How do we let you know if our policy changes?

Any policy changes, either due to business reasons or future changes in legislation, will be posted on this page and, if substantial, may be promoted on the Website or through e-mail notification.

### Contacting us

The data controller for your personal data will be the Sony Group company to which you have chosen to submit an application.

If you have questions about this privacy notice or wish to contact us for any reason in relation to our personal data processing, please contact us using the details below.

### **Sony Europe B.V.**

- **Via our online web form:**  
[www.sony.co.uk/support/en/contacts/pim/email](http://www.sony.co.uk/support/en/contacts/pim/email) On click of this link, you will be redirected to the website of the Sony group company for the online web form in a new browser tab



- **By email:**  
You can also contact us by emailing [privacyoffice.SEU@sony.com](mailto:privacyoffice.SEU@sony.com).
- **By mail:**  
If you are in the EU  
You can write to us at our business address above, or at

The Privacy Office  
c/o Sony Europe B.V. Legal Department,  
The Heights,  
Brooklands,  
Weybridge,  
Surrey, KT13 0XW  
United Kingdom

- **By telephone:**  
If you are calling from England, Wales & Scotland, please dial **0844 8466 555**  
9am to 6pm, Monday to Friday.  
4p per minute from a standard BT line, charges from other networks may vary.

If you are calling from Northern Ireland or Eire, please dial **(00 353) 1 413 1771** 9am to 6pm, Monday to Friday.

#### **Sony Corporation of America**

By email: [privacy@sonyusa.com](mailto:privacy@sonyusa.com) or write to us at:

Sony Corporation of America  
Attn: Privacy Officer (27th Floor)  
25 Madison Avenue  
New York, New York 10010

#### **Sony Electronics Inc.**

By email: [Privacy@am.sony.com](mailto:Privacy@am.sony.com) or write to us at:

Sony Electronics Inc.  
Personal Information Management Office,  
115 West Century Road – Suite 250  
Paramus, New Jersey 07652

**Sony India Software Center Pvt. Ltd.**

By email: [SISC.PIC@sony.com](mailto:SISC.PIC@sony.com)