

Employee and Candidate GDPR Privacy Policy Notice

The Company is the data controller in respect of all personal data collected and processed by the Company in relation to your recruitment by and employment with the Company. Much of the personal data about you that the Company holds is data you have provided directly to the Company. However, the Company may also: (a) receive data about you from other sources (for example, employment agencies, background check providers (who in turn receive information from public sources including the Disclosure and Barring Service, credit record agencies, education providers, and previous employers), customers, suppliers counterparties, and regulators; (b) create data about you in the course of job-related activities throughout the period of your employment with the Company (for example, performance reviews and opinions about your competencies); and (c) collect information obtained through electronic means such as swipe card or fingerprint records, presence monitoring, security monitoring (including audio and video), information about your use of the Company's information and communications systems, and information that may be contained in communications, including messages and email. Provision of pre-employment information is a requirement without which the Company may be unable to employ you.

Most personal data is collected and processed because it is necessary to take steps prior to entering into your employment contract, for the performance of your employment contract, and for the performance of your responsibilities. The Company may also process your personal data in order to comply with a legal obligation to which the Company is subject. Other processing may be necessary for the purposes of the Company's (or a third party's) legitimate interests including: (a) the operation, protection, financing, and management of the Company's business; (b) ensuring compliance with the Company's policies and rules and investigating allegations of wrongdoing; (c) to conduct litigation and take legal and professional advice; and (d) to operate the Company's information technology systems and maintain network and information security. You may also be asked to consent to additional processing during your employment and you may decline any such request.

With respect to personal data relating to criminal convictions and offences and other special categories of data, such as data concerning health, racial, or ethnic origin, religious or philosophical beliefs, political opinions, biometric data, data concerning your sex life or sexual orientation, or trade union membership, the Company generally processes that data only to the extent that it is necessary for the performance or exercise of obligations or rights which are imposed or conferred upon the Company or you by law in connection with your employment. The Company may use this information to: (a) carry out pre-employment checks; (b) to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence, and to administer benefits including statutory maternity pay, statutory sick pay, pensions, and permanent health insurance; (c) to comply with employment and other laws; and (d) carry out equality monitoring.

The Company may share personal data the Company holds with any member of the Company's group, which means the Company's subsidiaries, the Company's ultimate holding company, and its subsidiaries. The Company may also share your personal data with those who process personal data on the Company's behalf as well as: (a) auditors and professional advisors; (b) HMRC and other governmental authorities; (c) to the prospective seller or buyer of the business in which you work, the group, or any incoming service provider; (d) counterparties, customers, shareholders, and business partners; and (e) other third parties where permitted by law.

The Company intends to share your personal data with SESAC Rights Management, Inc. (the "Parent Company") located in the United States and has taken suitable safeguards with respect to the protection of your privacy, your fundamental rights, and freedoms (under Article 46 GDPR) pursuant to the Parent

Company's self-certification with the EU-US Data Privacy Framework, the UK Extension to the EU-US Data Privacy Framework, and the Swiss-US Data Privacy Framework. Information about the Data Privacy Framework can be found at www.dataprivacyframework.gov. The Company may also use processors around the world to host the Company's information technology platforms and such vendors have appropriate safeguards in place (under Article 46 GDPR).

The Company will keep your personal data in a form which permits your identification for no longer than is necessary for the purposes for which the personal data is processed including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, the Company considers (i) the amount, nature, and sensitivity of the personal data, (ii) the potential risk of harm from unauthorized use or disclosure of your personal data, (iii) the purposes for which the Company processes your personal data and whether the Company can achieve those purposes through other means, (iv) in accordance with the Company's data retention policies, and (v) the applicable legal requirements.

As a data subject in certain circumstances, you have rights to rectification, access, erasure, restriction, objection, and portability. Further details can be found at (i) www.commission.europa.eu/law/law-topic/data-protection_en which includes information to contact the appropriate national data protection authorities, (ii) www.ico.org.uk which includes information to contact the Information Commissioner, and (iii) www.edoeb.admin.ch/en/data-protection which includes information to contact the Federal Data Protection and Information Commissioner. If you have any questions, please contact either the human resources department at HR@sesacmusicgroup.com or the information technology department at IT@sesacmusicgroup.com.