



EU Contractor Data Privacy Notice

International and national laws and regulations, including those of the European Union (“EU”), place various restrictions on the processing and movement of personal data. This document tells you how Verizon will use your personal data relating to your engagement at Verizon.

When we refer to “Verizon” in this document we mean both the Verizon company which you are assigned to and the wider Verizon group of companies. The Verizon company to which you are assigned is the data controller of your personal data, which means that it determines what personal data is needed and how it should be used.

Verizon may be required by law to collect certain personal data about you. Failure to provide this information may prevent or delay the fulfillment of our obligations.

The Privacy Team handles personal data and privacy issues for Verizon in Europe and can be contacted at EMEAdataprotection@intl.verizon.com. If you have any questions regarding personal data, for example whether information we request from you is compulsory and the implications of not providing it, please contact the Privacy Team.

Below are answers to key questions you might have about how Verizon will use your personal data during your engagement:

1. What information do we collect directly from you?

Personal data includes home address and contact details, national identity number or similar identity number, marital status, educational background, medical/health information, history with Verizon, areas of expertise, remuneration and other benefits. Verizon will also have the IP address and other unique identifiers of your company-issued computer, tablet, smartphone and other devices.

2. What information do we collect from other sources?

Personal data that we obtain about you from other sources might include:

- background check information from employment screening agencies or publicly available registers (as allowed by law)
- publicly available professional profiles on websites or social media (e.g. LinkedIn)
- information about your performance or conduct from employees or other contractors, customers or suppliers you work with who may provide feedback about you.

3. Why do we have your personal data?

Verizon needs to process personal data in order to:

- carry out workforce administration including hiring, reporting, management and training
- respond to your enquiries and requests;
- fulfil our legal obligations to you such as health and safety obligations;
- conduct investigations and resolve disciplinary or grievance issues;
- comply with various reporting or disclosure obligations under applicable laws and regulations (for example in relation to health and safety records);
- conduct the business of Verizon, manage customer relationships and secure Verizon's and its customers' networks, operations, assets and premises.

4. What legal basis do we have for collecting and using your personal data?

Verizon must have a legal basis to process personal data. In most cases the legal basis will be one of the following:

- to fulfil our contractual obligations to you in connection with your engagement with Verizon;
- to comply with our legal obligations, for example keeping a record of accidents in the workplace to meet relevant obligations;
- to comply with our legal obligations to you, for example health and safety obligations that we must comply with
- to meet our legitimate interests, for example to manage our workforce effectively and to protect Verizon against criminal acts including theft and other risks. When we process your personal data to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to balance Verizon's needs with your interests or fundamental rights and freedoms.
- To protect your or another person's vital interests, for example by providing health information Verizon may hold about you to a doctor in a medical emergency.

Occasionally Verizon will ask for your consent for the processing of your personal data. We will make it clear when this is the case and you will be able to withdraw your consent at any time. We will also tell you what will happen if you do not give consent when we request it. If you would like information about the consents Verizon collects please contact EMEAdataprotection@intl.verizon.com.

5. How long will Verizon keep my personal data?

Verizon will keep personal data during and after your assignment only for as long as is necessary to achieve the purposes for which it was collected. Verizon's detailed [Records Retention Statement](#) with its Retention Schedule is available on VZWeb and provides more information about our record retention commitments.

Verizon retains the right to conduct monitoring activities in relation to your use of electronic communications (such as email and instant messaging), as set out in the company's electronic communications and information security policies, both during and after your assignment. As electronic communications are considered to be company property Verizon may access electronic communications at any time without prior notice in accordance with applicable laws, including after your assignment ends. You may therefore wish to delete any private personal

correspondence and information from such electronic communication methods prior to your departure.

6. Who else will have access to my personal data?

- Verizon is a global enterprise comprised of a group of companies operating internationally which is headquartered in the United States. The Verizon company to which you are assigned will share your personal data with other Verizon companies and their staff in the EU and outside the EU if it is necessary for the purposes explained in this Notice. These Verizon companies are bound, as required by law, to ensure that personal data is protected consistent with EU standards as explained in Section 8 “How is my personal data protected?” below.
- Verizon may also need to make some personal data available to a law enforcement agency, court, regulator, government authority, auditors or other third parties. We may share personal data with these parties where this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party.
- Verizon may also give your business contact information to Verizon’s customers when that information is necessary for business purposes.
- Verizon uses suppliers to provide some services, for example to provide IT support, or to help maintain the security of our premises and systems. In these instances Verizon gives these suppliers personal data so that they can provide the service and we ensure that the suppliers commit to protect the personal data (see below “How is my personal data protected?”).
- We may share personal data with any third party that purchases, or to which we transfer, all or substantially all of the assets and business of the Verizon company that you are assigned to. Should such a sale or transfer occur, we will use reasonable efforts to ensure that the entity to which we transfer your personal data uses it in a manner that is consistent with this privacy notice.
- A list of the third parties, or categories of third parties, who process personal data of Verizon’s workforce can be obtained on request from the Privacy Team.

7. Where is my data?

- Verizon processes and stores personal data in access-controlled, centralised databases in the United States and India, and in paper and electronic files located in the country or region where you are working. The electronic databases are controlled by specially authorised administrative human resources staff only and can be accessed only by authorised users.
- Verizon places certain information, such as names, pictures, and business contact numbers in internal Verizon directories, such as <https://vzweb2.verizon.com/user> and this information is accessible by all staff of Verizon.
- Third party recipients of personal data may be located in the EU, in the United States or elsewhere. Such recipients might be located in countries that do not afford statutory protections for personal data equivalent to those within the EU. In such circumstances your personal data is protected as required by law as outlined in the section below “How is my personal data protected?”

- Certain personal data, such as your name and office location, will be included as standard in electronic communications which you make and receive on Verizon's systems and equipment, and will be processed and stored by Verizon in accordance with the terms of this notice, Corporate Policy Instructions and the Verizon Code of Conduct.

8. How is my personal data protected?

Verizon is committed to maintaining the security of data, including personal data, and has comprehensive corporate policies regarding information security. Verizon will protect personal data, regardless of whether it is inside the EU, transferred to other Verizon companies or to third parties.

When personal data is transferred:

- between Verizon companies, it is protected by Verizon's Binding Corporate Rules for Controllers.
- to a supplier, we will ensure that the supplier commits to protect personal data through appropriate terms and conditions in the contract as required by law between Verizon and the supplier.
- to a company in the context of a business acquisition or disposal, we will ensure that protection of the personal data is a condition of the contract.
- to any company outside the EEA, we will ensure that the transfer is adequately protected by a recognized mechanism such as the EU Standard Contractual Clauses (as approved by the European Commission decision 2010/87/EU) or by appropriate Binding Corporate Rules, further details of which can be obtained from the Privacy Team at EMEAdataprotection@intl.verizon.com.

9. Does Verizon collect personal data of other people?

In addition to information about you, you may also provide Verizon with information about your dependants, relatives and friends for use in case of an emergency. You must tell those people that you have provided their data to Verizon and that Verizon stores and uses their data for the purposes for which you provided it in the manner set out in this notice. You may wish to share this Notice with them.

10. What are my rights?

- You have the right to update and correct the personal data which Verizon holds about you. We encourage you to keep all your personal information up to date by logging onto AboutYou.
- In certain limited circumstances which your human resources representative or the Privacy Team will be able to explain to you, you may object to the processing of your personal data by Verizon, or request that the processing by Verizon be restricted or the personal data deleted.
- You are entitled to request access to the personal data held by you by Verizon. You can do this by contacting your human resources representative or the Privacy Team at EMEAdataprotection@intl.verizon.com.
- If you have a formal complaint or objection regarding the processing of your personal data by Verizon, you can contact the data processing authority in the EU country in which you are based.

- You have the right to lodge a complaint with the supervising data protection authority in your EU country of residence, the EU country where you work or another EU member state where you believe a breach of the EU personal data protection laws occurred.

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