

## Notice at Collection and Privacy Policy for California Job Applicants

Last Updated: **August 21, 2023**

**AMC Global Media Inc.** and its subsidiaries and affiliated companies (“AMC”) takes your privacy seriously. We want you to know how we collect, use, and disclose, your personal information.

### **Assistance For The Disabled**

Alternative formats of this Privacy Policy are available to individuals with a disability. Please contact [TalentAcquisition@amcglobalmedia.com](mailto:TalentAcquisition@amcglobalmedia.com) for assistance.

### **This Privacy Policy explains:**

1. The categories of personal information we collect about you
2. The categories of sources from which we collect your personal information
3. The purposes for which we use your personal information
4. How we may disclose your personal information
5. How long we keep your personal information
6. Your rights and how to exercise them
7. Changes to this Privacy Policy

### **Scope:**

This Privacy Policy applies to the personal information of California residents in their role as job applicants to AMC (“Applicants”).

“**Personal information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Applicant.

### **1) THE CATEGORIES OF PERSONAL INFORMATION WE MAY COLLECT ABOUT YOU**

- **Identifiers**, for example: real name, alias, pronouns, nickname, telephone number, postal address, e-mail address, Social Security number, and signature.
- **Professional or Employment-Related Information**, for example: educational institutions attended, degrees and certifications, licenses, work experience and previous employers, and professional memberships and affiliations.
- **Non-public educational information**, for example: academic transcripts.
- **Commercial Information**, for example: travel expense records for an interview.
- **Internet Activity Information**, for example: interactions with AMC’s Internet web site, job application, or job advertisement, and publicly available social media activity.
- **Sensory or Surveillance Data**, for example: voice-mails and footage from AMC building video surveillance cameras if Applicant is interviewed on site.
- **§ 1798.80**: personal information described under Cal. Civ. Code § 1798.80 to the extent not already included in other categories in this section, such as a photograph.
- **Other details**, for example, hobbies and leisure activities or membership in voluntary/charitable/public organizations, for example, as stated on the Applicant’s resume.
- **Inferences**, for example, AMC might infer characteristics from a personality assessment completed by the Applicant.
- **Characteristics of Protected Classifications Under California or Federal Law for Applicants**, collected on a purely voluntary basis, except where collection is required by law, and used only in compliance with applicable laws and regulations, for diversity and inclusion reporting and related purposes.
- **Geolocation data**, for example: location arising from use of a temporary security badge in and within AMC facilities.
- **Other Sensitive Personal Information**, for example, health information in a health emergency.

**Note on inferring characteristics:** AMC does not collect or process sensitive personal information or characteristics of protected classifications for the purpose of inferring characteristics about the Applicant.

## **2) THE CATEGORIES OF SOURCES FROM WHICH WE MAY COLLECT YOUR PERSONAL INFORMATION**

- **You**, for example, in your job application, forms you fill out for us, assessments you complete, surveys you complete, and any information you provide us during the course of your application and interview process.
- **Vendors and service providers**, for example, recruiters.
- **Third parties**, for example, job references, educational institutions, affiliated companies, professional employer organizations or staffing agencies.
- **Public internet sources**, for example, social media, job boards, public profiles, and other public online sources.
- **Public records**, for example, credentialing and licensing organizations.
- **Automated technologies** on AMC's electronic resources, for example, to track logins and activity on AMC's careers page.
- **Surveillance/recording technologies installed by AMC**, for example, video surveillance in common areas of AMC facilities, voicemail technologies, webcams, and audio/video recording technologies with consent to the extent required by law.
- **Acquired companies**, if AMC acquired your employer, AMC might collect personal information from that employer.

**Note:** This Privacy Policy does not cover background screening conducted by third-party background check vendors subject to the federal Fair Credit Reporting Act. AMC provides a separate disclosure for such screening.

## **3) THE PURPOSES FOR WHICH WE MAY USE YOUR PERSONAL INFORMATION**

### **A. Generally Applicable Purposes:**

Unless stated otherwise in section 3.B, below, we may use Applicants' personal information for the following purposes:

#### **Recruiting, including:**

- To evaluate Applicants' qualifications or suitability for employment with AMC
- To communicate with Applicants
- For identification purposes
- To arrange and manage AMC-sponsored events
- To create a talent pool for future job openings
- For recordkeeping purposes
- To demonstrate Applicants' agreement to, or acceptance of, documents presented to them, *e.g.*, pre-employment arbitration agreement, acknowledgment of employment application, offer letter
- To evaluate and improve the recruiting process
- To promote AMC as a place to work

#### **Monitoring, Security, and Compliance, including:**

- To monitor use of AMC facilities and information systems
- To ensure compliance with applicable laws and AMC policies
- To conduct audits and investigations
- To protect the safety and security of AMC's facilities
- To administer AMC's whistleblower hotline
- To report suspected criminal conduct to law enforcement and cooperate in investigations
- To exercise AMC's rights under applicable law and to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel

#### **Conducting Our Business, including:**

- For training purposes or quality assurance with respect to AMC employees conducting the interviews or otherwise assisting with the recruiting and hiring process
- For travel and event planning
- To engage in crisis management
- To manage travel reimbursements

**Miscellaneous Other Purposes:**

- To manage and operate information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, and strategic planning;
- To manage litigation involving AMC, and other legal disputes and inquiries and to meet legal and regulatory requirements;
- In connection with a corporate transaction, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of AMC or any of its subsidiaries or affiliates; and
- To protect the rights, property, or safety of AMC, and AMC’s employees, customers or others.

**B. Purposes Specific To Certain Categories Of Personal Information:**

We may use the categories of Applicants’ personal information listed in this Section 3.B for the purposes stated below:

**Purposes For Using Applicants’ Geolocation Data:**

Upon entry to AMC’s facilities, AMC may issue Applicants a temporary security badge capable of collecting geolocation data within AMC facilities. AMC will use this information to protect the safety and security of its facilities and the people in its facilities, including the Applicant.

**Purposes For Using Applicant Health Information:**

- To the extent necessary to comply with AMC’s legal obligations, such as to accommodate disabilities
- To protect the health and safety of AMC’s employees and facilities, for example, to take the Applicant’s temperature
- For occupational health and safety compliance and record-keeping
- To respond to an Applicant’s medical emergency

**Note:** This Privacy Policy does not cover health information governed by the Health Insurance Portability and Accountability Act (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH Act), or California’s Confidentiality of Medical Information Act (CMIA).

**Purposes For Using Applicants’ Protected Categories Of Information:**

AMC collects information about race, age, national origin, disability, sex, and veteran status as necessary to comply with legal obligations, including the reporting requirements of the federal Equal Employment Opportunity Act, the federal Office of Contracting Compliance Programs (applicable to government contractors), and California’s Fair Employment and Housing Act, and for purposes of demographic analytics.

AMC may also use this personal information for purposes including: (a) with respect to disability and/or medical condition, as necessary, to comply with federal and California law related to accommodation; and (b) with respect to age, incidentally to the use of birth date for identity verification.

AMC collects protected categories of personal information on a purely voluntary basis, except where required by law, and uses the information only in compliance with applicable laws and regulations.

**Deidentified Information**

At times, AMC converts personal information into deidentified information using reasonable measures to ensure that the deidentified information cannot be associated with the individual (“Deidentified Information”). AMC maintains Deidentified Information in a deidentified form and does not attempt to reidentify it, except that AMC may attempt to reidentify the information solely for the purpose of determining whether its deidentification processes ensure that the information cannot be associated with the individual. AMC prohibits vendors, by contract, from attempting to reidentify AMC’s Deidentified Information.

#### 4) HOW WE MAY DISCLOSE YOUR PERSONAL INFORMATION

AMC generally maintains information related to Applicants as confidential. However, from time to time, AMC may have a legitimate business need to disclose Applicants' personal information for one of the purposes listed in Section 3, above, to one or more of the categories of external recipients listed below. In that event, AMC discloses your personal information only to the minimum extent necessary to achieve the purpose of the disclosure and only if the disclosure is permitted by the CPRA and other applicable laws.

- **Service providers and contractors:** AMC discloses your personal information to service providers and contractors for the purposes above to assist us in our recruiting efforts and in meeting our business needs and legal obligations.
  - AMC only discloses your personal information to service providers and contractors subject to written contracts as required by applicable law.
  - Service providers and contractors include recruiters, law firms, travel agencies, and any other entity providing services to AMC.
- **Affiliated companies:** Other companies within the AMC family of companies.
- **Government or administrative agencies:** These may include, for example:
  - Equal Employment Opportunity Commission as required for reporting.
  - California Department of Fair Employment and Housing as required to respond to employment claims and charges.
  - Law enforcement in the event of criminal investigations.
- **Required Disclosures:** We may be required to disclose personal information in a court proceeding, in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law.
- **Legal Compliance and Protections:** We may disclose personal information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of AMC, our employees, customers or others.
- **Corporate Transactions:** We may disclose your personal information in connection with a corporate merger, consolidation, bankruptcy, the sale of all, or substantially all, of our membership interests and/or assets or other corporate change, including to any prospective purchasers.

#### **No sales and no “sharing”, i.e., disclosure for cross-context behavioral advertising:**

AMC does not sell the personal information of any Applicants nor share their personal information for cross-context behavioral advertising.

#### 5) HOW LONG WE KEEP YOUR PERSONAL INFORMATION

If AMC hires you, the information collected about you during the job application process may become part of your personnel file and may be used to administer the employment relationship and for related reporting and recordkeeping purposes. AMC will retain this application information for the entire duration of your employment relationship with AMC and for as long thereafter as permitted or required by applicable law. AMC makes its document retention schedule available to employees for review.

AMC will retain information of applicants who are not hired for at least four (4) years after the record is collected or as long thereafter as permitted or required by applicable law. These records will be retained for our internal recordkeeping and reporting purposes in compliance with California Government Code § 12946. During that time, we may use your information to consider you for positions in addition to the position(s) for which you initially applied.

#### 6) YOUR PRIVACY RIGHTS AND HOW TO EXERCISE THEM

##### a. Your California Privacy Rights

Subject to applicable law, Applicants have the following rights:

- **Right to Know:** You have the right to submit a verifiable request for copies of specific pieces of your personal information obtained from you and for information about AMC's collection, use, and disclosure of your personal information. Please note that the CPRA's right to obtain copies does not grant a right to the whole of any document that contains personal information, but only to copies of “specific pieces” of personal information.

Moreover, Applicants have a right to know categories of sources of personal information and categories of external recipients to which personal information is disclosed, but not the individual sources or recipients. AMC does not always track individualized sources or recipients.

- **Right to Delete:** You have the right to submit a verifiable request for the deletion of personal information that you have provided to AMC.
- **Right to Correct:** You have the right to submit a verifiable request for the correction of inaccurate personal information maintained by AMC, taking into account the nature of the personal information and the purposes of processing the personal information.

#### **b. How to Exercise Your Rights**

AMC will respond to requests know, delete, and correct in accordance with applicable law if it can verify the identity of the individual submitting the request. You can exercise these rights in the following ways:

- Email [TalentAcquisition@amcglobalmedia.com](mailto:TalentAcquisition@amcglobalmedia.com)
- Through any other method offered to the public pursuant to AMC's privacy policy, available at [www.amcglobalmedia.com/privacy-policy](http://www.amcglobalmedia.com/privacy-policy)

#### **c. How We Will Verify Your Request:**

The processes that we follow to verify your identity when you make a request to know, correct, or delete are described below. The relevant process depends on how and why the request is submitted.

If you submit a request by any means other than through a password-protected account that you created before the date of your request, the verification process that we follow will depend on the nature of your request as described below:

1. **Requests To Know Categories or Purposes:** If you request to know how we collect and handle your personal information, we will match at least two data points that you provide with your request, or in response to your verification request, against information about you that we already have in our records and that we have determined to be reliable for purposes of verifying your identity. Examples of relevant data points include your mobile phone number, your zip code, and the month and year you submitted a job application to us.
2. **Requests To Know Specific Pieces of Personal Information:** We will match at least three data points that you provide with your request to know, or in response to our request for verification information, against information that we already have about you in our records and that we have determined to be reliable for purposes of verifying your identity. In addition, we may require you to sign a declaration under penalty of perjury that you are the individual whose personal information is the subject of the request.
3. **Requests To Correct or Delete Personal Information:** Our process for verifying your identity will depend on the risk level (as determined by AMC) associated with the personal information that you ask us to correct or delete. For low-risk personal information, we will require a match of two data points as described in Point No. 1, above. For higher risk personal information, we will require a match of three data points and a signed declaration as described in Point No. 2, above.

We have implemented the following additional procedures when verifying the identity of requestors:

1. If we cannot verify your identity based on the processes described above, we may ask you for additional verification information. If we do so, we will not use that information for any purpose other than verification.
2. If we cannot verify your identity to a sufficient level of certainty to respond to your request, we will let you know promptly and explain why we cannot verify your identity.

#### **d. Authorized Agents**

If an authorized agent submits a request to know, correct, or delete on your behalf, the authorized agent must submit with the request a document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you or your authorized agent to follow the applicable process described above for verifying your identity.

#### **d. AMC's Non-Discrimination and Non-Retaliation Policy**

AMC will not unlawfully discriminate or retaliate against you for exercising your privacy rights under the California Privacy Rights Act.

## **7) CHANGES TO THIS PRIVACY POLICY**

If we change this Privacy Policy, we will post those changes on our Careers website and update the Privacy Policy modification date above. If we materially change this Privacy Policy in a way that affects how we use or disclose your personal information, we will provide a prominent notice of such changes and the effective date of the changes before making them.

### **For More Information**

For questions or concerns about AMC's privacy policies and practices, please contact us at **TalentAcquisition@amcglobalmedia.com**.