



# PRIVACY POLICY

LIBERTY GLOBAL



LIBERTY GLOBAL

July 2023



# CONTENT

3

WHY PRIVACY MATTERS

4

SCOPE OF THE POLICY

5

OUR PRIVACY POLICY

9

POLICY REQUIREMENTS

10

QUESTIONS AND ANSWERS

11

GLOSSARY OF TERMS



# WHY PRIVACY MATTERS

**At Liberty Global, our approach to respecting and protecting Privacy extends beyond legal compliance requirements. It is a core principle that is critical to building and maintaining trust with our stakeholders.**

In carrying out our business, we may collect, use or have access to Personal Data belonging to natural persons such as customers and other consumers, employees and other parties with whom we do business, including suppliers, contractors, consultants and agents (all referred to as “Individuals”).

It is therefore important for all of us to be aware of applicable laws and regulations regarding the responsible use of Personal Data (“Applicable Laws and Regulations”). We are committed to respecting the Privacy of any Individual whose Personal Data we process.

Anyone who works for or on behalf of Liberty Global and its fully owned operating companies is responsible for safeguarding Personal Data within Liberty Global’s control, and must therefore be familiar with all applicable policies and guidelines regarding the protection of this data. This includes but is not limited to employees, contractors, business partners and third party organisations.

The Privacy Policy (this “Policy”) sets out the guiding principles for the way in which Personal Data shall be treated by those who have access to it. For more information about the procedures underpinning this Policy, visit the **Digital Confidence space on LibertyCONNECT**.



# SCOPE OF THE POLICY

You are not expected to know the details of every legal requirement applicable to our business in every jurisdiction. However, you are responsible for understanding the legal requirements applicable to your employment duties, and for seeking advice from your Data Protection Officer when there is anything you are unsure of regarding processing Personal Data.

You also need to be aware of Liberty Global's core principles, as outlined in **Liberty Global's Code of Conduct**, when encountering and resolving situations related to the Privacy of an Individual.

This Policy is in accordance with any applicable legal or regulatory requirement, and applies to each employee of Liberty Global ("Employee").

The Policy equally applies to:

- **All other external parties** including, without limitation, contractors that (i) provide services to Liberty Global and (ii) do not have an employment contract with Liberty Global. Such contractors shall, for the purpose of this Policy only, be included in the definition of Employee.
- **Any Personal Data** we obtain in carrying out our business that belongs or relates to any of our employees, our customers or other consumers, or to third parties with whom we do business, such as suppliers, contractors, consultants and agents.
- **Throughout the entire lifecycle of all Personal Data** that we handle during the course of our business. See the next page for the lifecycle and its different stages.

This Policy does not form part of the employee's terms and conditions of employment and Liberty Global reserves the right to amend, suspend or withdraw this Policy at any time.

Failure to comply with this Policy may result in disciplinary action, up to and including termination.



# OUR PRIVACY POLICY

## OUR RESPONSIBILITIES THROUGHOUT THE PERSONAL DATA LIFECYCLE

Data can be thought of as having its own 'lifecycle' which incorporates the following stages:



**Collection** – This is when the data is first generated or obtained.

Within Liberty Global this could be when recording new employee' details or possibly when consumers interact with us via our website or through social media. We may even receive data from Third-Parties with whom we do business.



**Use** – This is when the data is processed, either electronically or manually, for any purpose. This could include using the data to make decisions, using it in a calculation, or merely updating it. Examples in our business could include supporting an operating company with using customer data to authorize reception of a television service or channel, or to calculate a bill, or to provide them with information on our products and services.



**Storage** – This is when the data is saved, either physically or electronically, for later use. Data may be stored whilst it is being used day-to-day and also when backup or archived copies of the data are created.



**Deletion** – This is the process of destroying the data, including physical and electronic copies, so that the Personal Data can no longer be accessed or used.

Understanding these phases is important as our responsibilities in relation to Personal Data continue throughout the entire data lifecycle.



## COLLECTION AND USE OF PERSONAL DATA

The processes and people involved in the separate actions of collecting and using Personal Data can be, and often are, different. Various software applications and manual processes may be involved, as well as electronic (hard disk) and physical (cabinets) data storage solutions.

We must ensure that we only collect and/or use Personal Data for specific, legitimate business purposes and that we only collect the minimum amount of Personal Data that is necessary for us to serve these purposes.

This may include both commercial and legal purposes.

In some specific cases, particularly where we process Special Categories of Personal Data, we may also be required to obtain Individuals' explicit consent before processing their Personal Data. If such consent is required, then you must use the appropriate notice or language approved by your local Legal Department.

When **collecting** Personal Data we must ensure that we provide Individuals with the following information (including but not limited to):

- What Personal Data we collect about them.
- How we use their Personal Data and for what purposes.
- The recipients or categories of recipients of the Personal Data.
- The identity and the contact details of the controller ('Liberty Global'), including the contact details of the Data Protection Officer ([privacy@libertyglobal.com](mailto:privacy@libertyglobal.com)).
- The legal basis for the processing of the Personal Data, and if the processing is based on legitimate interests, what those interests are.
- Where we intend to transfer Personal Data outside the EEA, the specific information required by Applicable Laws and Regulations (such as contractual safeguards).
- The period for which the Personal Data will be stored, or if not possible, the criteria used to determine that period.
- The rights that the Individuals have in respect of their Personal Data.
- The existence of automated decision-making, including profiling and information about the logic involved, as well as the significance and the potential consequences for the Individual.

When **using** Personal Data we must additionally ensure that:

- We only use Personal Data for the specific purpose for which it was collected and that was communicated to the Individual at the time of collection.
- Where possible we ensure the Personal Data does not (directly) identify an individual (e.g. pseudonymised data).
- We exercise a high standard of care with regard to Personal Data and refrain from for example disclosing Personal Data to unauthorised persons or for any non-business purpose. An even higher standard of care should be exercised in respect of Special Categories of Personal Data.
- We maintain the accuracy and integrity of the Personal Data and, where Personal Data is found to be inaccurate, we take appropriate steps to correct it.
- We only use the minimum amount of Personal Data to enable the undertaking of our assigned roles and responsibilities.
- Where we intend to further process the Personal Data for a purpose other than for which the Personal Data was collected, we will provide the Individuals with the necessary information prior to such processing.



## STORAGE

We must only retain Personal Data for as long as necessary to enable us to fulfill the specific and legitimate business purpose for which we collected it, unless further retention of the Personal Data is required by Applicable Laws and Regulations.

## DELETION

Where Personal Data is no longer required we must destroy the Personal Data in a secure manner or anonymise the Personal Data in line with applicable Company policies.

## RIGHTS OF INDIVIDUALS

There are many Applicable Laws and Regulations relating to the Rights of Individuals.

We have dedicated teams to deal with customer and employee rights.

Where the processing is based on consent, the Individual may withdraw their consent at any time (without affecting the lawfulness of processing carried out prior to such withdrawal).

Where Individuals request access to their Personal Data which we possess ('right of access'), or request information about our processing activities regarding their Personal Data ('right to be informed'), we are required to provide such information within 30 calendar days.

Where formally requested by Individuals, we will take appropriate actions to correct any Personal Data held about them which is not accurate ('right to rectification').

In certain circumstances Individuals have the right to have their Personal Data deleted without undue delay ('right to be forgotten') or request restriction of further processing ('right to restriction of processing').

Individuals have the right to receive their Personal Data, which they provided to Liberty Global, in an appropriate format and have the right to transmit that data to another company ('right to data portability').

In certain circumstances Individuals have the right to object and the right not to be subject to decisions based solely on automated processing.

## PROTECTING PERSONAL DATA

Personal Data must be treated with care. This means access must be restricted to authorised individuals only.

We have implemented appropriate controls to maintain the security of Personal Data while it is in our possession. Information Security controls over Personal Data are in line with Liberty Global's applicable **Information Security Policy**.

Where Special Categories of Personal Data are processed, we will implement necessary additional controls to reflect the increased risk of harm that may occur as a result of its loss or inappropriate disclosure. Liberty Global's Data Protection Officer and Global Security must be consulted to ensure risks are adequately assessed and appropriate additional controls are designed where necessary. See Privacy Impact Assessments below.

When we work with Third-Parties, we must ensure that any Third-Party who receives Personal Data from us or collects it on our behalf, is aware of this Policy and our



requirement to comply with our provisions, and puts in place appropriate controls in order to protect the Personal Data.

We must also ensure that Third-Parties are aware of the requirement to notify us in the event of an incident involving Personal Data that they process on behalf of the Company.

#### PRIVACY IMPACT ASSESSMENTS

When we start a new initiative (such as the development of a new system, application, product or service) or change existing processes or systems, we must complete an assessment to ensure that the rights of Individuals and Applicable Laws and Regulations are identified and complied with.

#### UNAUTHORISED DISCLOSURE OR LOSS OF PERSONAL DATA

In the event we or Third-Parties we work with, become aware of the loss or unauthorised disclosure of Personal Data this must be reported immediately to the Data Protection Officer who will take appropriate action to respond and resolve

the incident. See the **Privacy Incidents page** for more information.

#### TRANSFER OF PERSONAL DATA

Many countries have implemented specific restrictions on the transfer of Personal Data outside of their legal jurisdiction. Therefore, before transferring any Personal Data internationally, we must complete an assessment to ensure that the rights of Individuals and Applicable Laws and Regulations are identified and complied with.

#### TRAINING AND AWARENESS

We have a mandatory e-learning and additional guidance in the form of a resource center on our intranet to ensure our employees are aware of their responsibilities regarding the processing of Personal Data.

#### REPORTING AND COMMUNICATIONS

Any known or suspected violations of this Policy should be reported immediately to your Data Protection Officer.

If you are uncomfortable reporting the

matter directly, you may always report anonymously as described in Liberty Global's Code of Conduct.

We will not permit retaliation against employees who, in good faith, seeks advice concerning, or who reports or complains of violations of this Policy. If, however an employee makes a false report of a violation or of questionable behavior for the purpose of harming another person, the reporting person will be subject to disciplinary action.

The Data Protection Officer must be notified immediately should any communication (e.g. telephone, letter, email) be received from a Supervisory Authority or other relevant regulator.

To find out more about our responsibilities throughout the Personal Data lifecycle, or any of the obligations mentioned:

- Go to the **Digital Confidence space on LibertyCONNECT**; or
- Contact your Data Protection Officer at: **Privacy@libertyglobal.com**.





# POLICY REQUIREMENTS

The following are the key requirements of this policy which all employees must follow:

- All new initiatives or proposed changed services, products, processes or systems must follow the Privacy Impact Assessment procedures and processes.
- Suspected violations of this Policy, but also incidents involving the potential breach of confidentiality, integrity or availability of Personal Data must be immediately reported to the Data Protection Officer as a Personal Data Breach.
- The mandatory privacy trainings to which you have been enrolled must be completed successfully within the timeframe given.
- Any new Third-Parties we intend to contract, and/or renewal of existing contract with Third-Parties, must have undergone privacy assessment. When contracts end, Third-Parties must have undergone an off boarding assessment. The Procurement and contracting procedures must be followed at all times.
- Whenever Personal Data is processed (collected, used, stored, disclosed or deleted), you must ensure our policies, procedures and processes are followed. Whenever in doubt please contact the Data Protection Officer for guidance.



# QUESTIONS AND ANSWERS

## WHAT IS THE PRIVACY POLICY?

The Privacy Policy outlines the principles, standards and rules of behavior expected of anyone who works for or on behalf of Liberty Global and its fully owned operating companies when they collect, use, retain or disclose Personal Data. The Privacy Policy also underpins our Privacy Statement, which is publicly available to inform our customers, employees, visitors and other Individuals of their rights and our obligations in relation to our processing of their Personal Data.

Complying with Applicable Laws and Regulations can be a complex matter and the Privacy Policy does not remove the need for us all to exercise good judgment – however, it should make it easier for us to comply. You also need to comply with your local policies and procedures on Privacy as adopted by your division or business unit.

## WHERE DO I GO IF I HAVE PRIVACY RELATED QUESTIONS?

We have appointed a Data Protection Officer within Liberty Global, this person is your initial point of contact for any matter or question related to Privacy.

For further information:

- Go to the **Digital Confidence space on LibertyCONNECT**; or
- Contact your Data Protection Officer at: **Privacy@libertyglobal.com**.

## WHAT COULD HAPPEN TO INDIVIDUALS WHO VIOLATE THE PRIVACY POLICY?

Violations of the Privacy Policy and Applicable Laws and Regulations may subject Liberty Global and the individuals concerned to severe consequences. A failure to follow the Privacy Policy that involves a criminal act, could result in prosecution after referral to the appropriate authorities. Violations of the Privacy Policy may also result in disciplinary action, including termination of employment.



# GLOSSARY OF TERMS

## APPLICABLE LAWS AND REGULATIONS

The applicable data protection and privacy laws and regulations, locally and internationally, such as the European General Data Protection Regulation in the European Union or national data protection laws as implemented in the United Kingdom or Switzerland for instance.

## PRIVACY

The appropriate use of Personal Data under any circumstances. What is appropriate will depend on context, law, and the individual's expectations. Privacy encompasses the Right of Individuals to control the collection, use, and disclosure of their Personal Data, as well as the obligations of Liberty Global with respect to the collection, use, storage, disposal and disclosure of Personal Data.

## PERSONAL DATA

All data relating to an identified or identifiable Individual. An Individual may be identified even if Liberty Global does not have access to that Individual's name, for example by singling out through patterns. Personal Data therefore includes but is not limited to names, addresses, birthdates, employment data such as leave records, pension, compensation, benefits or tax information. With respect to our customers, Personal Data also includes but is not limited to traffic data, billing records, location data, IP addresses, internet usage data and settop box usage data.

## SPECIAL CATEGORIES OF PERSONAL DATA

Defined as Personal Data relating, but not necessarily limited, to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, the processing of genetic data, biometric data for the purpose of uniquely identifying an Individual, health, sex life or sexual orientation, commission or alleged commission of any offence, criminal proceedings or any other identifier of general application and personality or behavioral profiles.



## **PROCESSING**

Any operation or set of operations performed on Personal Data or sets of Personal Data, whether or not by automated means. This includes the collection, use, retention, disclosure and destruction of Personal Data.

## **DATA PROTECTION OFFICER**

The (appointed) employee that advises on, and monitors compliance with, the Applicable Laws and Regulations and acts as the point of contact with the Supervisory Authority.

## **RIGHT OF INDIVIDUALS**

The rights that are granted to Individuals by the GDPR and that are applicable to companies that process Personal Data (such as the right of access to Personal Data).

## **PRIVACY BY DESIGN**

An approach to new initiatives or changes of existing practices or systems that promotes privacy and data protection compliance from development to implementation. It ensures that privacy risks are identified, properly assessed and, where required, mitigated before launching any new or adjusted technology, product, or service.



## **CONTROLLER**

The person or company who determines the purposes for which and manner in which Personal Data is processed.

## **PERSONAL DATA BREACH**

A potential breach of confidentiality, integrity or availability of Personal Data. Examples are unauthorised access gained to Personal Data or the loss of documents containing Personal Data.

## **THIRD PARTIES**

Parties with whom we do business, with whom we work, or who conduct business or provide services on our behalf, such as suppliers, contractors, consultants and agents.

## **SUPERVISORY AUTHORITY**

An independent public authority which is established by a Member State of the European Union and is responsible for the monitoring the application of the GDPR, in order to protect the fundamental rights and freedoms of Individuals in relation to processing activities and to facilitate the free flow of Personal Data within the European Union.

