

PRIVACY AND PERSONAL DATA PROTECTION POLICY for Members of Staff



JCDecaux Angola

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1. PREAMBLE

- ▶ JCDecaux Angola takes **the protection of privacy and personal data** very seriously.
- ▶ To the extent that JCDecaux Angola collects or uses your personal data for its own purposes as a result of your employment with JCDecaux Angola, JCDecaux Angola is acting as the controller (hereinafter “**JCDecaux Angola**” or “**we**”, “**us**”, etc.) and as such, agrees to implement **appropriate measures to ensure the protection, confidentiality and security of your personal data**, in accordance with legal requirements and, in particular, the Data Protection Act 2021.
- ▶ The purpose of this privacy and data protection policy (hereinafter the “**Data Protection Policy**”) is to inform you about the commitments made by JCDecaux Angola to ensure your personal data are respected and protected.

2. SCOPE

- ▶ This Data Protection Policy **applies to all processing of personal data implemented by JCDecaux Angola in the Republic of Angola**, in relation to its employees, including trainees or interns, and temporary staff or temporary agency staff (hereinafter “**Member(s) of Staff**” or “**you**”).

3. DEFINITIONS

- ▶ “**Controller**”: the legal entity which determines the purposes of such processing and the means implemented.
- ▶ “**Data Protection Agency**”: the body/authority appointed as Angola’s data protection authority under Law 22/11 on the Protection of Personal Data.
- ▶ “**JCDecaux Group**”: includes JCDecaux SE, its direct & indirect subsidiaries and all the companies in which JCDecaux SE directly or indirectly has an interest.
- ▶ “**Personal data**”: any information that can be used to directly or indirectly identify a natural person.
- ▶ “**Processing**”: operation or set of operations which is performed on personal data, such as collection, recording, use, transmission or disclosure.
- ▶ “**Processor**”: the legal entity which processes personal data on behalf of the controller.

4. DATA COLLECTED AND PURPOSES OF COLLECTION

- ▶ JCDecaux Angola only collects and processes **personal data that is relevant, adequate, not excessive and strictly necessary** in relation to the purposes previously determined. JCDecaux Angola takes all useful measures to ensure that your data is accurate, complete and, where necessary, kept up to date.
- ▶ To give you a better understanding of the way in which we use your personal data, below is a table where you can find information about the processing of your data:
 - Column 1 – In what cases is your data collected? This column explains the activities in connection with which we use or collect your personal data.
 - Column 2 – What types of data about you do we collect? This column describes the types of personal data we collect.
 - Column 3 – How and why do we process your data? This column explains what we do with your personal data and the reasons why we collect it.
 - Column 4 – On what legal grounds is your data processed? This column explains the grounds on which we can use your personal data.

We have made every effort to provide you with the most exhaustive list possible, based on currently known processing operations and laws.

In what cases is your data collected?	What types of data about you do we collect?	How and why do we process your data?	On what legal grounds is your data processed?
Administrative and payroll management	<ul style="list-style-type: none"> • Identification data (surname, name, gender, address, date of birth, nationality, identity card/passport in case of travel) • Contact information (address, phone number) • Identification of personal vehicle, type of driver's license • Work permit • Function and status • Identification number • Marital status • Number of children • Existence of a disability • Information about your employment contract • Identity and contact details of persons to be contacted in case of an emergency • Work-related accidents and occupational diseases (contact details of the occupational physician, date of the accident or first medical diagnosis of the occupational disease, date of last day worked, date of return to work, grounds for sick leave) • Medical examinations (date of examinations, fitness for a specific position) • Professional work schedule • Data on business trips or work-related travel (reservations, bills) • Salaries, allowances, bonuses and benefits • Bank account details 	<p>For example, to:</p> <ul style="list-style-type: none"> • Prepare the personal career records of Members of Staff • Process your payroll • Manage internal directories and organization charts • Manage individual allocations of office supplies, equipment and company cars/vehicles • Manage business trips or work-related travel • Handle the reporting of work-related accidents or occupational diseases • Manage medical examinations • Ensure litigation management • Manage absences, work cycles and working time • Manage departures of Members of Staff • Manage mandatory social security filing requirements 	<ul style="list-style-type: none"> • The performance of your employment contract • To comply with legal and regulatory requirements in the area of employment law • JCDecaux Angola's legitimate interest in protecting its interests and its Members of Staff

	<ul style="list-style-type: none"> • Data on absences from work (sick leave days, paid leave days, parental leave., etc.) 		
Monitoring performance, careers and mobility	<ul style="list-style-type: none"> • Identification data (surname, name, phone number) • Function, status • Contact details • Date and terms of hire or recruitment, CV • Date, object and reason for changes made to the professional situation of a Member of Staff • Dates of performance reviews, identity of the managers • Personal and professional skills/competencies of a Member of Staff • Targets set, results obtained, assessment of professional skills • Career evolution planning • Training periods completed, training sessions followed, knowledge assessments 	<p>For example, to:</p> <ul style="list-style-type: none"> • Carry out professional evaluations of Members of Staff • Identify personal and professional skills/competencies within the organisation (soft and hard skills) • Recognise (validate) professional experience • Manage professional mobility • Identify training needs 	<ul style="list-style-type: none"> • The performance of your employment contract • JCDecaux Angola's legitimate interest in satisfying career and mobility requests by its Members of Staff and offering them interesting career advancement prospects
Management and monitoring of staff representative bodies	<ul style="list-style-type: none"> • Identification data (surname, name, phone number) • Function, status • Contact details • Requested benefits and entitlements • Electoral lists and results • Notices of calls to meetings, preparatory documents and minutes of meetings of staff representative bodies 	<p>For example, to:</p> <ul style="list-style-type: none"> • Organise staff representative elections • Monitor the meetings of staff representative bodies • Manage social and cultural activities of JCDecaux Angola 	<ul style="list-style-type: none"> • The performance of your employment contract • To comply with legal and employment obligations

Security of premises	<ul style="list-style-type: none"> • Video-surveillance images 	To ensure the safety and security of persons and of premises, and to control access to premises	<ul style="list-style-type: none"> • JCDecaux Angola's legitimate interest in protecting its Members of Staff and its premises
Management of car fleets	<ul style="list-style-type: none"> • Location data 	To ensure the proper use of JCDecaux Angola vehicles made available	<ul style="list-style-type: none"> • JCDecaux Angola's legitimate interest in managing the use of its vehicles
Supply of IT tools	<ul style="list-style-type: none"> • Identification data (surname, name, photo, date of birth, nationality, preferred form of address (Mr./Mrs./Ms.), phone number, professional address) • Position, status • Email address • Connection identifier and password • Data in connection with the electronic messaging system (address book, diary, dates, meeting places and times, daily tasks) • Directory 	<p>For instance, to:</p> <ul style="list-style-type: none"> • Manage the installed base of fixed and mobile phones • Manage the installed base of computer equipment • Manage access authorizations to applications and to the network • Ensure the security and proper operation of IT applications and networks • Manage the professional electronic messaging system • Manage the use of applications • Manage professional diaries • Facilitate / Organise remote work 	<ul style="list-style-type: none"> • The performance of your employment contract • JCDecaux Angola's legitimate interest in providing IT resources to its Members of Staff

- ▶ Please note that in some cases we may put in place **tools for the control of IT systems and applications** for the purpose of ensuring the security of JCDecaux Angola's network and/or protecting our rights and interests.
- ▶ When JCDecaux Angola collects your personal data via a form (paper or electronic), the **mandatory nature of the information** to be completed is typically marked by an **asterisk**. Any failure to complete that information or any response JCDecaux Angola considers abnormal may result in JCDecaux Angola refusing to process your request.
- ▶ You agree that the personal data you provide about yourself to JCDecaux Angola **will be current, accurate, complete and unequivocal**.

5. DATA RECIPIENTS

- ▶ JCDecaux Angola only discloses your personal data to **determined authorised recipients**, in compliance with applicable rules.
- ▶ JCDecaux Angola can provide access to your personal data to **companies outside of Angola within JCDecaux Group**, whenever necessary for administrative or payroll management or for career and mobility management, or to protect the interests and security of JCDecaux Angola, and to **possible third-party service providers**, acting as processors, to achieve the purposes described in section 4 above (such as hosting, storage, analytical, data processing, database management, payroll management, or IT maintenance services). These third-party providers will act only on the instructions of JCDecaux Angola and will only have access to your personal data to achieve the purposes pursued upon collection of such personal data and shall be under the same security and confidentiality obligations as JCDecaux Angola.
- ▶ JCDecaux Angola may also transfer your data to authorised public authorities or bodies.
- ▶ In addition, your personal data may **be disclosed on the following grounds**:
 - In case of a merger or acquisition of all or part of JCDecaux Angola by a third party, as is hereby accepted by you;

- In response to legal or administrative proceedings of any kind or to enforcement measures requested by the competent authorities;
- To comply with legal obligations, protect the rights and/or safety of an individual, to protect the rights and property of JCDecaux Angola, including the need to ensure that this Data Protection Policy is respected and to prevent any technical, security or fraud-related issues.

6. DATA RETENTION

- ▶ JCDecaux Angola will keep your personal data **for as long as necessary to achieve the purposes for which they are collected and processed** (typically for the term of your employment contract). JCDecaux Angola may, however, keep your personal data for a longer period whenever this is a **legal obligation** for us or to take into account the **applicable statute of limitation period** to assert, exercise or defend legal claims. Your personal data may sometimes be kept for shorter periods depending on the purpose for which such data are processed, such as in the case of access logs to IT tools.

7. SECURITY

- ▶ JCDecaux Angola will ensure the security of your personal data through a data protection system that uses **physical and logical security measures**.

8. DATA TRANSFERS

- ▶ The companies outside of Angola within JCDecaux Group, service providers or other third parties listed above to us to whom JCDecaux Angola may disclose your personal data may be domiciled abroad, and in particular **outside the Republic of Angola**.
- ▶ In such case, JCDecaux Angola shall require them to take, in accordance with applicable legislation, all organisational and technical measures that permit ensuring **an adequate level of protection of your personal data** (in particular, by the use of Standard Contractual Clauses approved by the Data Protection Agency – of which you may obtain a copy, as applicable, upon request to: za_information.officer@jcdecaux.com).

9. RIGHTS OF DATA SUBJECTS

- ▶ Under applicable data protection legislation, you have certain rights regarding the collection and processing of your personal data, namely:
 - **A right to be informed:** you have the right to be informed in a concise, transparent, intelligible and easily accessible form about the way in which your personal data is processed.
 - **A right of access:** you have the right to obtain (i) confirmation as to whether personal data concerning you is processed or not and, if processed, to obtain (ii) access to such data and a copy thereof.
 - **A right to rectification:** you have the right to obtain the rectification of any inaccurate personal data concerning you. You also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
 - **A right to erasure:** in some cases, you have the right to obtain the erasure of personal data concerning you. However, this is not an absolute right and JCDecaux Angola may have legal or legitimate grounds for keeping such data.
 - **A right to restriction of processing:** in some cases, you have the right to obtain restriction of the processing of your personal data.

- **A right to data portability:** you have the right to receive the personal data concerning you which you have provided to JCDecaux Angola, in a structured, commonly used and machine-readable format, and you have the right to transmit such data to another controller without hindrance from JCDecaux Angola. This right only applies when the processing of your personal data is based on your consent or on a contract and such processing is carried out by automated means.
 - **A right to object to processing:** you have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you when such processing is based on the legitimate interest of JCDecaux Angola. JCDecaux Angola may, however, invoke compelling legitimate grounds for continued processing.
 - **A right to lodge a complaint with the Data Protection Agency:** you have the right to contact the Data Protection Agency to complain about JCDecaux Angola's personal data protection practices.
- To exercise these rights, you can send **a request to:** Data Protection Officer, JCDecaux Angola (Legal Department), by email to the following address: za_information.officer@jcdecaux.com, or by postal mail to the following address: Bairro do Benfica - Talhão Nº 09-I - Municipio do Belas - Luanda – Angola, together with a copy of your identity document.

10. CHANGES TO POLICY

- JCDecaux Angola may update this Data Protection Policy at any time to reflect possible new practices. In such case, **the date of the Data Protection Policy will be updated and indicate the date when such changes were made**. We invite you to check for any possible updates of this Data Protection Policy, which will be posted in the "Data Protection" section of the internal Legal Service System and or JCDecaux's intranet, or you could obtain an updated copy from the Legal Department by sending an email to za_information.officer@jcdecaux.com. If JCDecaux Angola makes any changes to this Data Protection Policy which it considers to be substantial, you will be informed via email.

11. CONTACT US

- If you would like more information about this Privacy and Personal Data Protection Policy, please contact: JCDecaux Angola Legal Department on za_information.officer@jcdecaux.com.
- JCDecaux Angola has also appointed a Data Protection Officer, who can be contacted at: za_information.officer@jcdecaux.com.



This Policy may be updated at any time, so we advise you to check for updates from time to time.