



SONY MUSIC

California Recruitment Privacy Policy

Last Updated and Effective: January 9th, 2023

Overview

Sony Music Entertainment (“Sony Music”) takes your privacy extremely seriously. This California Recruitment Privacy Policy (the “Policy”) relates only to the recruitment services provided via this website, and describes what personal data we collect, why and how we collect it, who we share it with, and how you can contact us if you have any queries or concerns about this information. It also describes your data protection rights (as applicable), including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the Privacy Rights sections below.

Please note that other companies in the Sony Group operate a range of other websites, including recruitment. These companies have their own privacy policies, which are generally available from the relevant websites for those products and services.

This website is operated by Sony Music.

Information we collect

What sort of data do we collect?

Sony Music collects personal data about you to help in the recruitment process. The exact data we collect during the recruitment process can differ depending on the country in which the job is located, and any specifically necessary data will be made clear to you throughout the process. Such personal data may consist of:

- **Personal Identifiers**, including your name, date of birth, address, e-mail address, phone and other contact media, or information you choose to provide in social media;
- **Other Identifiers**, such as your social security number, passport number, driver’s license or state identification card number;
- **Characteristics of protected classifications under California or federal law**, including racial/ethnic origin, veteran status, gender and disability;
- **Professional or employment-related information**, including your work history, your time and performance at previous employment, information included in your CV/resume, responses to questions presented in the employment application, other information you

choose to provide in social media (such as LinkedIn) and in your CV/Resume, and your responses to questions presented in the website, background checks, including criminal record checks, security vetting, credit history and other details of your application;

- **Education information**, including your education history; and
- **Other information**, such as background checks, including criminal record checks, security vetting, credit history, inferences drawn from any of the information collected, and other details of your eligibility to work.

Personal data about you provided by third parties

The following third parties may provide personal data about you:

- Recruitment agencies that you have selected to search for jobs and submit job applications on your behalf may provide us all the above information about you;
- Third parties that you have selected to provide your references may provide information on your time and performance at previous employment;
- Organizations approved to undertake criminal records checks; governmental bodies authorized to provide the criminal records; and
- Publicly available sources which we use to confirm the information you provide as part of your application.

Do we collect any sensitive personal information?

We do collect and process sensitive personal information where it is necessary for the recruitment process and in compliance with all applicable legislation, specifically:

- Social Security Number (or other Government ID);
- Racial/ethnic origin;
- Passport number;
- Criminal record;
- Gender (U.S. only);
- Disability (U.S. only);
- Veteran status (U.S. only)

We will explain, when this is collected, whether and why this data is mandatory and our legal basis for the collection.

How do we use the information we collect?

We use the information we collect:

- Where necessary for Sony Music's legitimate interests, as listed below, and where not overridden by your data protection rights:

- Receiving and reviewing job applications;
- Administering and managing your registrations and job applications;
- Recruiting and selecting staff for roles we have advertised and for which you have applied; and
- Protecting our legitimate business interests and legal rights. This includes, but is not limited to, use in connection with legal claims, compliance, regulatory, auditing, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation) and other ethics and compliance reporting requirements.
- Where necessary for Sony Music to administer any future contract of employment and employment record;
- Where necessary to comply with a legal obligation:
 - Meeting requirements to ensure you are eligible to work under local laws, including immigration laws; and
 - Making deductions from payroll for tax and social security purposes and providing information to tax and social security authorities, as required by law and where you have successfully obtained a role at Sony Music.
- Where you have given your consent (where we ask for consent, you are free to withhold or revoke it):
 - To send you alerts about new roles at Sony Music.

Sharing information about you

Your personal data will be shared as follows:

- We share some of your personal data with other Sony Group companies, which operate in various countries (including, for example, Japan, and India) to administer and manage group functions, including to manage your registration on the website and your application for a role at Sony Music;
- Your personal data will also be shared with companies providing services under contract to Sony Music, the IT provider of this recruitment portal, recruitment agencies and services (such as LinkedIn) supporting our recruitment process, applicant tracking and recruiting SAAS providers, and external auditors; and
- Personal data will also be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the protection of our legitimate interests in compliance with applicable laws.

International Transfers of your personal data

Sony Music is a global organization. For the purposes explained in this policy, your information may be transferred to other companies within the Sony Group and third parties in countries such as Japan, which may not have the same level of data protection laws as those in the country in

which you are located. Details of the recipients are provided in the 'Sharing information about you' section.

When making international transfers out of the EU we use standard contractual data protection clauses, which have been approved by the European Commission. For further information, including to obtain a copy of the documents used to protect your information, please contact us as described in the Contacting Us section below.

How is this data safeguarded?

We take commercially reasonable steps to protect your personal information. This includes setting up processes and procedures to minimize unauthorized access to or disclosure of your information, and we use reasonable efforts to obtain the agreement of Sony Group companies and third-party service providers to take steps to protect the confidentiality, security, and integrity of personal information we share with them. However, no electronic data transmission or storage of information can be guaranteed to be 100% private and secure.

Retention

We will retain your personal data only for as long as we need it for Sony Music's legitimate interests in accordance with applicable law, to fulfill your application and any following employment contract or to meet a legal requirement, after which we will take steps to delete your personal data or hold it in a form that no longer identifies you.

Notice Regarding "Do Not Track" Signals

Some web browsers offer a "Do Not Track" feature that signals to websites you visit that you do not want to have your online activity tracked. When you choose to turn on the "Do Not Track" settings in your browser, your browser will send a signal to websites, analytics providers, advertisement networks, plug-in providers, and other web service providers you encounter while browsing to stop tracking your activity. To find out more about "Do Not Track," please visit www.allaboutdnt.com.

Global Privacy Control ("GPC") is a technical specification in your browser settings that you can use to automatically inform websites of your privacy preferences with regard to third party online tracking. To find out more about and to set up GPC, please visit <https://globalprivacycontrol.org/#about>.

Opting out of tracking or targeted advertising cookies doesn't mean you won't receive online advertising, just that the adverts you see won't be based on the website pages you've visited.

Your Privacy Rights and How to Exercise Them

- **Right to Know:** You have the right to submit a verifiable request for copies of specific pieces of your personal information collected in the preceding 12 months and for information about Sony Music’s collection, use, and disclosure of your personal information during that same 12-month time period. Please note that the California Privacy Rights Act’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, you 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. Sony Music 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 Sony Music.
- **Right to Correct:** You have the right to submit a verifiable request for the correction of inaccurate personal information maintained by Sony Music, considering the nature of the personal information and the purposes of processing the personal information.

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

Sony Music does not sell the personal information of any candidates nor disclose their personal information for cross-context behavioral advertising.

How to Exercise Your Rights

Sony Music will respond to requests to 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:

- Call 1-833-380-0676; or
- Complete the request form available [here](#).

How We Will Verify Your Request:

In respect of rights of access and portability, deletion and correction, we will take reasonable steps to verify your identity based upon the information you provide, and you may be asked to provide additional proof of identification so that we can verify your identity and validate the request. We will only use such additional information you provide in a request to verify your identity. 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. The relevant verification process depends on how and why the request is submitted. Pursuant to the CPRA, we will not require you to verify your identity, beyond asking for the information necessary to complete your request, when you exercise your rights to opt out of the Sharing or Sale of your personal information or to limit the use and disclosure of Sensitive Personal Information. As stated above, Sony Music does not sell your personal information nor disclose your Sensitive Personal Information for cross-context behavioral advertising.

Authorized Agents

If an authorized agent submits on your behalf a request to know, correct or delete, the authorized agent must be registered with the California Secretary of State, and submit with the request either (a) a power of attorney, signed by you, that is valid under California law; or (b) another 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. You can obtain “Authorized Agent Designation” form by contacting us at [here](#).

Sony Music’s Non-Discrimination And Non-Retaliation Policy

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

Children

To submit a job application via this website you must be 18 years of age or older. If you are under 18 and wish to apply for a job that is advertised on this website, please contact us directly by using the details in the Contacting Us section below. If you are under 16 years of age, please ask your parent or legal guardian to contact us.

How do we let you know if our policy changes?

Any policy changes, either due to business reasons or future changes in legislation, will be posted on this page and, if substantial, may be promoted on this website or through e-mail notification.

Contacting us

The data controller for your personal data will be the Sony Group company to which you have chosen to submit an application.

If you have questions about this privacy policy or wish to contact us for any reason in relation to our personal data processing, please contact us by writing to the address below.

Attn: Sony Music Privacy Office

25 Madison Avenue, 22nd Floor
New York, New York 10010

Or you can [click here](#) to submit feedback online.