

# OBS/OCS TRAINING PROGRAMMES PRIVACY POLICY

OBS and OCS has in place several Training Programmes, including the Broadcast Training Programme (“BTP”), a legacy programme from OBS as the host broadcaster of the Olympic Games to the host country designed to provide students with a unique extracurricular experience. Participants receive training directly from OBS and OCS professionals and acquire the necessary skills to potentially work in the broadcast of the Olympic Games and, in some cases, they are given the opportunity to have a professional experience with OBS or OCS.

This OBS/OCS Training Programmes Privacy Policy (the “**Privacy Policy**”), as updated from time to time, explains what information about you is collected and how it is processed in the context of the OBS/OCS Training Programmes, including the BTP. By applying to one of the BTP or other Training Programmes vacancies, you agree to your information being collected and processed in accordance with this Privacy Policy.

SUMMARY	
<b>DATA CONTROLLER(S)</b>	Olympic Broadcasting Services, S.L.U. (“ <b>OBS</b> ”) and Olympic Channel Services, S.L.U. (“ <b>OCS</b> ”).
<b>PURPOSES</b>	OBS/OCS as Data Controllers will collect and process your Personal Data for the management of the BTP, including the recruiting process or requesting referrals from your university, as further described in section 3 hereunder.
<b>RECIPIENTS</b>	Third parties, including service providers. OBS/OCS partners agencies that will carry out the hiring process. Olympic Stakeholders.
<b>LEGITIMATION</b>	Contract necessity and Legitimate interest. Consent when it comes to obtaining referrals from your university.
<b>RIGHTS</b>	You have the right to access, rectify and erasure your data, as well as additional rights as detailed in the additional information.
<b>ADDITIONAL INFORMATION</b>	You may consult the additional information for more details on the processing of your Personal Data below.

## 1. The Data Controller of your Personal Data

### 1.1. The Data Controllers of the Personal Data that will be collected and used in connection with the BTP are the companies indicated below:

- **Olympic Broadcasting Services, S.L.U. (“OBS”)** with trade register No. B83747691 and a registered address in Calle Torrelaguna 75, 28027 Madrid.
- **Olympic Channel Services, S.L.U. (“OCS”)** with trade register No. B87320867 and a registered address in Calle Torrelaguna 75, 28027 Madrid.

When we refer to “**we**”, “**our**” or “**us**”, we are referring to OBS/OCS acting as data controllers, and when we refer to “**you**” or “**your**” we refer to you as the individual from whom we process Personal Data.



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- 1.2. OBS and OCS have appointed a Data Protection Officer that can be contacted at the email address [dpo@obs.tv](mailto:dpo@obs.tv) or at the postal address Calle Torrelaguna 75, 28027, Madrid.
- 1.3. OBS and OCS have implemented the appropriate technical and organisational measures to prevent the alteration, loss, misuse, unauthorised processing and access, or theft of your personal data, taking into consideration the available technology.
- 1.4. From time to time, we may change this Privacy Policy to accommodate new technologies, industry practices, regulatory requirements, or for other purposes. We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. We will provide you notice by sending an email, by posting notice of such changes on our websites, or by other means as required in compliance with applicable law.

## 2. Legal Grounds for Processing Personal Data

- 2.1. Under applicable data protection law, there are various legal bases or grounds on which we can rely when processing your Personal Data. In some contexts, more than one ground applies. The grounds for processing are as follows:

- **Performance of a contract:** data processing is necessary for performance of a contract with you or to take steps at your request to enter a contract. These covers carrying out our contractual duties and exercising our contractual rights.
- **Legal Obligation:** data processing is necessary to comply with our legal obligations. The processing is necessary for ensuring we perform our legal and regulatory obligations. For example, providing a safe place of work or complying with health and safety laws.
- **Legitimate Interest:** data processing is necessary for our or a third party's legitimate interest. We or a third party have legitimate interests in carrying on, managing, and administering our respective businesses effectively and properly and in connection with those interests processing your Personal Data. Where we rely on legitimate interests, we consider:
  - a) what our legitimate interest is – these are set out in the table below;
  - b) whether the processing is necessary to achieve it (i.e. whether it is proportionate); and
  - c) whether it can be balanced against individuals' interests, rights, and freedoms.

Where this test is not met, we do not rely on legitimate interest. This Privacy Policy serves as a record of our legitimate interest assessment.

- **Consent:** this is where you have given specific consent to processing your Personal Data.
- 2.2. The relevant legal bases that we rely upon for each type of data processing activity and Personal Data collected is specified in the next paragraph 3.

### 3. The Information and Personal Data we collect, purposes and Legal Basis.

- 3.1. As part of the selection process to participate in OBS/OCS Training Programmes, we will collect information about you which you can (a) provide to us directly by means of your application within our website and relevant digital platforms (or by any other electronic means) or (b) indirectly, provided by a third party who is authorised to share information with us including (without limitation) your university or college or (c) indirectly provided by the International Olympic Committee (“**IOC**”) or the corresponding local Organising Committee (“**OCOG**”) in certain specific Training Programmes, which will be notified to you appropriately.
- 3.2. Your Personal Data will be processed for the following purposes:

	Purpose	Personal Data processed	Legal basis
1	<b>Training Programmes (including BTP) recruiting evaluation:</b> to evaluate your eligibility and suitability to apply to an OBS/OCS Training Programme opportunity and be considered for future opportunities within OBS/OCS.	Information concerning your application and our assessment of it, including without limitation, your name, surname, education, CV, continent and city of residence, contact details, skills, University references, photo, presentation video, professional portfolio, etc.	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• OBS/OCS prevailing Legitimate Interest to create a job pool to consider candidates for future positions for an efficient management of Training Programmes recruiting, if candidates do not object to such data processing activity.</li> </ul>
2	<b>Training Programmes management (including BTP) carrying out the day-to-day operations.</b> This includes sharing any required information with the partner agency that will ultimately	Information concerning your application and our assessment of it, including your name, surname, CV, nationality, email address, phone number, residence address, date of birth, your references, photo,	<ul style="list-style-type: none"> <li>• Performance of a contract</li> </ul>



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Purpose		Personal Data processed	Legal basis
	hire the successful training Programmes candidates.	presentation video, professional portfolio and any other information related to your BTP application and the BTP in general.	
3	<b>Obtaining referrals from University or College</b> with the purpose of confirming your status as a student at such university/college. By agreeing to this Privacy Policy, you consent that your University/College share such information with us.	Your name, surname, enrolment date, whether you are an enrolled student, etc.	<ul style="list-style-type: none"> <li>• Consent</li> </ul>
4	<b>Providing workshops and trainings</b> to the Training Programmes participants.	Name, surname, image and any other information related to your Training participation. Some of this training sessions will be recorded.	<ul style="list-style-type: none"> <li>• OBS/OCS prevailing Legitimate Interest in <i>managing the BTP program and training sessions being able to support the BTP participants.</i></li> </ul>
5	<b>OBS/OCS Integrity Line management</b> and the subsequent processing of any reports and relevant investigations in compliance with our legal obligations.	Contact information (name, surname), investigation/report information and in certain cases special categories of personal data that you may voluntarily include as part of a complaint. As part of this activity, we may share some information with our external advisors, and, exceptionally with the IOC, under the specific requirements established.	<ul style="list-style-type: none"> <li>• Legal obligation</li> <li>• Public Interest</li> </ul>

### 3.3. Your Personal Data will not be used for automated decision making or profiling.

## 4. Recipients of your Personal Data

OBS/OCS may share your Personal to the following recipients:

- **Service Providers** that OBS /OCS contracts, or may contact, that assist OBS/OCS in their day-to-day activities (including IT and Tech Providers) solely for the purposes set out in this Policy.
- Where applicable, **OBS/OCS partner agency** or analogous entity that will ultimately carry out the hiring of the successful Training Programme/BTP participants.
- **OBS/OCS affiliates and Olympic Stakeholders:** Your Personal Data may be disclosed to the International Olympic Committee (“**IOC**”) and the relevant Organising Committee for the corresponding Olympic Games edition as required in order to successfully manage the Training Programmes and the BTP and the delivery of the Olympic Games. We will provide you with further details of this as it may be relevant and/or required. The potential disclosure to the IOC will constitute an international data transfer. Switzerland is a country with level of protection equivalent to the European Economic Area according to the Commission Decision of 26 July 2000 pursuant to Directive 95/46/EC of the European Parliament and of the Council, on the adequate protection of personal data provided in Switzerland.
- **External advisors** as required and relevant to manage OBS/OCS Integrity Line on the bases of OBS/OCS legitimate interest.

## 5. International Transfers

- 5.1. Your Personal Data may be shared to third parties on a cross-border basis for the purposes of managing the business trips of the employee, manage Olympic Games operations where the Olympic host country is outside the EU/EEA and/or hiring adequate health insurances for employees when travelling abroad.
- 5.2. Such recipients may be located in various jurisdictions inside and outside of the European Economic Area (“**EEA**”), including in countries (such as the United States of America) which may not have a level of protection for Personal Data equivalent to the level of protection available in the EEA.
- 5.3. OBS/OCS shall take measures required by the applicable data protection laws to ensure that the Personal Data continue to benefit from an adequate level of protection, including without limitation, the formalisation of European model clauses as approved by the European Commission. In other occasions OBS/OCS will rely on the available derogations under art. 49 of GDPR, particularly contractual necessity (49.1(c) GDPR) as certain information will need to be transferred to other countries for lawful and appropriate reasons. OBS/OCS will provide further information on the specific cases by complementary data protection notices as relevant. You can request a copy of any such safeguards in the address mentioned in this clause.



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## **6. Personal Data storage and Data Retention**

- 6.1.** Your Personal Data shall be retained as well for the time required to fulfil the purposes and generally manage the BTP program and your participation.
- 6.2.** We will retain your information only for the duration necessary for the purposes identified in this Privacy Policy or as required to meet our legal requirements. Once your personal data is no longer necessary for these purposes, data will be blocked. During the blocking period, your data will be only unblocked and processed again exclusively for the purpose of the exercise or the defence against administrative or legal claims. Once this period is over, your Personal Data will be erased.

## **7. Your Data Protection Rights**

- 7.1.** You may exercise your rights of access, rectification, erasure, objection, restriction of processing and data portability in the cases and to the extent established by applicable law at any time. You also have the right to withdraw your consent at any time.
- 7.2.** When we have relied in our legitimate interest for the data processing activity at hand, you have the right to object to such data processing following the same process established herein. We will then stop processing the data unless we can demonstrate a compelling legitimate ground that overrides your rights (e.g. exercising or defending a legal claim) or an exemption that applies.
- 7.3.** To exercise your rights, you may write to Calle Torrelaguna 75, 28027 Madrid, or send an e-mail to our Data Protection Officer at [dpo@obs.tv](mailto:dpo@obs.tv). If you have any additional data protection concerns that we can't address, you can also file a complaint before the Spanish Data Protection Agency ([www.aepd.es](http://www.aepd.es)).

**Last Updated:** February 10<sup>th</sup> 2025