

Prospective Contributor Privacy Notice

1. Scope

Like most businesses, we hold and process a wide range of information, some of which relates to individuals who we seek to engage on our productions. This Privacy Notice explains the type of information we process, why we are processing it and how that processing may affect you.

The notice focuses on individuals who we are speaking to about potentially taking part one of our productions. This Privacy Notice is set out in this document (the Core Notice) and the Supplementary Information in the Annex to this document. In the Supplementary Information, we explain what we mean by “personal data”, “processing”, “sensitive personal data” and other terms used in the notice.

2. Personal Data- what we hold and why we process it

We process data for the purposes of our business including for our productions. The Supplementary Information provides more specific information on this purpose, the type(s) of data that may be processed and on the grounds on which we process data. See *Legal grounds for processing personal data and further information on the data we process and our purposes*.

3. Where the data comes from and who gets to see it

Some of the personal data that we process about you comes from you, for example your mobile number, name, age and email address

Your personal data may be seen internally by relevant people working on a production. Further information on this is provided in the Supplementary Information. See *Where the data comes from and Who gets to see your data?*

4. How long do we keep Personal Data

We do not keep your personal data for any specific period but will not keep it for longer than is necessary for our purposes. If you are chosen to work on a production, we will, in general, keep your personal data for the duration of your engagement and for a period afterwards. Otherwise we will only retain for your personal data for a short period of time after our discussions have ended. See *Retaining your personal data – more information* in the Supplementary Information.

5. Your data rights

You have a right to make a subject access request to receive information about the data that we process about you. Further information on this and on other rights is in the Supplementary Information under *Access to your personal data and other rights*. We also explain how to make a complaint about our processing of your data.

6. Data controller

In processing your personal data, we act as a data controller.

7. Status of this notice

This notice is for information purposes only and does not mean or imply that you will be chosen to work on one of our productions.

Prospective Contributor Privacy Notice- Supplementary Information

1. What is “Personal Data” and “Processing”

“**Personal data**” is information relating to you (or from which you may be identified) which is processed by automatic means or which is (or is intended to be) part of a structured manual filing system. It includes not only facts about you, but also intentions and opinions about you.

Data “**processed automatically**” includes information held on, or relating to use of, a computer, laptop, mobile phone or similar device. It covers data derived from equipment such as access passes within a building, data on use of vehicles and sound and image data such as CCTV. It also covers video, audio and images captured as part of a production.

“**Processing**” means doing anything with the data, for example, it includes collecting it, holding it, disclosing it and deleting it.

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual orientation, sex life, trade union membership and genetic and biometric data are subject to special protection and considered by EU privacy law to be “**sensitive personal data**”.

References in the privacy notice for prospective contributors to work or services (and similar expressions) include any arrangement we may have under which an individual provides us services in relation to a production. We use the word “**you**” to refer to anyone within the scope of the notice.

2. Legal grounds for processing Personal Data

Under data protection law, there are various grounds on which we can rely when processing your personal data. In some contexts more than one ground applies. We have summarised these grounds as, Legal obligation, Legitimate Interests and Consent and outline what those terms mean in the following table.

Term	Ground for processing	Explanation
Legal obligation	Processing necessary to comply with our legal obligations	Ensuring we perform our legal and regulatory obligations.
Legitimate Interests	Processing necessary for our or a third party’s legitimate interests	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 data. Your data will not be processed on this basis if our or a third party’s interests are overridden by your own interests, rights and freedoms.
Consent	You have given specific consent to processing your data	In general processing of your data in connection with the services you provide is not conditional on your consent, although there may be general exceptions to this.

3. Processing Sensitive Personal Data

If we process sensitive personal data about you, as well as ensuring that one of the grounds for processing mentioned above applies, we will make sure that one or more of the grounds for processing sensitive personal data applies. In outline, these include:

- Processing being necessary for the purposes of your or our obligations and rights in relation to your engagement in so far as it is authorised by law or collective agreement;

- Processing relating to data about you that you have made public (e.g. if you tell us you are ill);
- Processing being necessary for the purpose of establishing, making or defending legal claims;
- Processing being necessary for provision of health care or treatment, medical diagnosis, and assessment of your working capacity (including (but not limited to) for infectious disease control and / or health emergencies such as Covid-19 or any other pandemic / epidemic);
- Processing for equality and diversity purposes to the extent permitted by law.

4. Further information on the data we process and purposes

The Core Notice outlines the purposes for which we process your personal data. More specific information on these, examples of the data and the grounds on which we process data are in the table below. The examples in the table cannot, of course, be exhaustive. For example, although the table does not mention data relating to criminal offences, if we were to find out that someone working for us was suspected of committing a criminal offence, we might process that information if relevant for our purposes. We may also require criminal background checks for certain roles – for example those working with minors.

Purpose	Examples of personal data that may be processed	Grounds for processing
Potential Engagement	Information concerning your application to work on our productions and our assessment of it, your references, any checks we may make to verify information provided or background checks and any information connected with your right to work. If relevant, we may also process information concerning your health, any disability and in connection with any adjustments to filming arrangements.	Legal obligation Legitimate interests
Evaluating your potential role on a production to enable its creation, broadcast, sale and distribution	Information connected with our potential role including, if you are in consideration for an on-screen or voiceover role, the processing images / video / audio of you.	Legal obligation Legitimate interests
Providing details in connection with our seeking new engagements on other productions	Information relating to your potential role with us	Legitimate interests
Health and safety of the workforce and assessment of your working capacity	Information concerning your health, including self-certification forms, temperature checks (both self-certified and / or checked by us in connection with your potential role), antibody or disease testing / results, and sharing results of any tests or checks carried out with third parties where it is necessary to do so (on an anonymous basis unless reason requires more specific information to be included).	Consent Legitimate interests Legal obligation
Physical and system security	CCTV images. Records of use of swipe and similar entry cards.	Legal obligation Legitimate interests

Purpose	Examples of personal data that may be processed	Grounds for processing
Monitoring of diversity and equal opportunities	Information on your nationality, racial and ethnic origin, gender, sexual orientation, religion, disability and age as part of diversity monitoring initiatives. Such data will be aggregated and used for equality of opportunity monitoring purposes. Please note we may share aggregated and anonymised diversity statistics with regulators if formally required / requested.	Legitimate interests
Disputes and legal proceedings	Any information relevant or potentially relevant to a dispute or legal proceeding affecting us.	Legitimate interests Legal obligation

Please note that owing to the fact that you are appearing in one of programmes, on some occasions we or third parties will rely upon exemptions to data protection rules in relation to journalistic freedom, the right to artistic expression or more generally, the right to freedom of expression (as mentioned in article 85 of the General Data Protection Regulation and in various jurisdictions' data protection rules, for example in the UK's Data Protection Bill section on the exemption for '*journalistic, academic, artistic or literary purposes*'

5. Where data comes from

When you apply to be in one of our productions, the initial data about you that we process is likely to come from you, for example, contact details. We may also require references and information to carry out background checks (see above).

In relation to infectious disease control and national health emergencies, including but not limited to Covid-19 and / or other pandemics or epidemics, you may be required to provide us with information or a self-certification which includes sensitive personal data relating to your health and fitness to work as requested by us. In addition, we may require you to undertake testing such as temperature checks and / or antibody or disease tests. We shall either receive the results directly or require you to inform us of the results, and shall treat and process the information as sensitive personal data.

6. Who gets to see your data?

Internal use: Your personal data may be disclosed within the Studio Lambert group working on your production for the purposes of deciding whether to include you in a production. In response to infectious disease and / or health emergencies (including, but not limited to Covid-19) we may also disclose personal data to other members of the All3Media group where your personal data and / or test results may need to be disclosed in specific circumstances for the health and safety of the wider workforce and the group as a whole.

External use: We will only disclose your personal data outside the Studio Lambert group if disclosure is consistent with a ground for processing on which we rely and doing so is lawful and fair to you. We may disclose your data if it is necessary for our legitimate interests as an organisation or the interests of a third party (but we will not do this if these interests are over-riden by your interests and rights in particular to privacy). We may also disclose your personal data where it is mandated by government regulation or legislation in response to infectious disease control and / or a public health emergency (including, but not limited to, Covid-19).

Specific circumstances in which your personal data may be disclosed include:

- Disclosure to external recipients of electronic communications (such as emails) which contain your personal data;

- Disclosure of aggregated and anonymised diversity data to relevant regulators as part of a formal request.

7. Retaining your Personal Data- more information

Although there is no specific period for which we will keep your personal data, we will not keep it for longer than is necessary for our purposes. In general, we will keep your personal data until the show has been produced and for a period afterwards. In considering how long to keep it, we will take into account its relevance to our business and your engagement either as a record or in the event of a legal claim.

If your data is only useful for a short period (for example, CCTV, we may delete it. Personal data relating to contributor applications (other than the person who is successful) will normally be deleted after 12 months.

8. Transfers of Personal Data outside of the EEA- more information

In connection with our business and for production, broadcasting, distribution, administrative, management, marketing and legal purposes, we may transfer your personal data outside the EEA to members of our group and data processors in the US and on occasion other jurisdictions in which we are established. Some of our systems are hosted in the US. We will ensure that any transfer is lawful and that there are appropriate security arrangements.

9. Access to your Personal Data and other rights

We try to be as open as we reasonably can about personal data that we process. If you would like specific information, just ask us. You also have a legal right to make a “subject access request”. If you exercise this right and we hold personal data about you, we are required to provide you with information on it, including:

- giving you a description and copy of the personal data; and
- telling you why we are processing it

If you make a subject access request and there is any question about who you are, we may require you to provide information from which we can satisfy ourselves as to your identity.

As well as your subject access right, you may have a legal right to have your personal data rectified or erased, to object to its processing or to have its processing restricted. If you have provided us with data about yourself (for example your address or bank details), you have the right to be given the data in machine readable format for transmitting to another data controller.

10. Complaints

If you have complaints relating to our processing of your personal data, you should raise these with your key contact at the production in the first instance. You may also raise complaints with your statutory regulator. For contact and other details ask your key contact at the production.

11. Status of this notice

This notice is for information purposes only and does not mean or imply that you will be chosen to work on one of our productions.