

CORPORATE PRIVACY NOTICE

1 About this privacy notice

- 1.1 During the course of our activities, Tinopolis Limited and its group of companies (**we**), will collect, hold and use personal information about our staff, freelancers, contractors, agents and other business partners (**you**).
- 1.2 We recognise the need to treat your personal data in an appropriate and lawful manner, in accordance with **data protection legislation**. This means the Data Protection Act 1998 and, from 25 May 2018, the General Data Protection Regulation (EU) 2016/679, the UK Data Protection Act and all applicable laws and regulations relating to the processing of personal data.
- 1.3 The purpose of this notice is to make you aware of how we will handle your personal data. This notice does not form part of any contract and we may amend it at any time.
- 1.4 In this notice, **personal data** means recorded information we hold about you from which you can be identified. It may include contact details and other personal information.

2 What information do we collect about you?

- 2.1 The personal data about you which we expect to collect, hold and use (**process**) is likely to include the following. This list is not exhaustive but is intended to give you a clear idea of the personal information about you which we process:
- 2.1.1 contact names, address, date of birth, personal telephone numbers and personal email addresses for you and your emergency contacts;
 - 2.1.2 information gathered during your recruitment process (including references, right to work checks and unspent or spent convictions and criminal records checks where applicable);
 - 2.1.3 details of the terms of your employment (including pension and other benefits) or engagement;
 - 2.1.4 payroll, tax and national insurance information, your bank account details and information about expense claims;
 - 2.1.5 details of your job title and job duties, management, and the organisation of work;
 - 2.1.6 information about your performance including appraisals, pay rises, promotions and complaints (whether made by you or about you);
 - 2.1.7 absence records including holiday records, self-certification forms, medical certificates and health records;
 - 2.1.8 details of leave for family or personal reasons (e.g. maternity, paternity, shared parental or adoption leave);

- 2.1.9 details of any disciplinary investigations, grievance investigations or complaints, whether or not any disciplinary action was taken;
- 2.1.10 education records, training records and records of qualifications and achievements;
- 2.1.11 health and safety incidents;
- 2.1.12 monitoring on diversity (including, for example, age, race/ethnicity, religion, whether you have a disability, sexual orientation, gender identity and marital status);
- 2.1.13 information on your membership of, or being a representative of, a trade union;
- 2.1.14 access you may have to our property or a customer's property and how you use it;
- 2.1.15 your photograph for company ID procedures;
- 2.1.16 digital data including building access (such as swipe cards or CCTV footage) and your use of our telephone and IT systems including laptops, computers, tablets, smartphones, and other devices provided by us (in some circumstances this may include us monitoring those systems); and
- 2.1.17 communications with those responsible for managing you, others working with you and (as applicable) with the Human Resources department, Finance Department and Production Management.

2.2 Some of the information we process about you constitutes "special categories" of personal data, which is information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information for uniquely identifying a person, information concerning health, and information concerning a person's sex life or sexual orientation. Information concerning criminal convictions is placed in a similar category. These special categories are considered particularly sensitive and we will therefore only process this personal data where absolutely necessary. We will ensure it is only seen by those who have to see it and will keep it secure.

3 How will we collect your information and who will it be shared with?

- 3.1 The personal data we collect about you may be (i) provided directly to us by you (whether that is information we already hold through the recruitment process, or information you provide to us after that), or (ii) provided by a third party, for example, another employer giving us a reference about you, a recruitment agency or an insurer. We will collect additional personal information about you during the course of your employment/engagement.
- 3.2 Information about you may be shared with or used by other organisations with whom we work. This may include recruitment agencies, payroll provider, employee benefits provider, group companies, insurance and pension companies, occupational health providers, statutory bodies (such as HMRC) in order to comply with our legal obligations, and credit reference agencies. This may also include broadcasters/clients, programme distributors and our assignees and licensees.

- 3.3 We may transfer the personal information we collect about you to countries outside the European Economic Area where necessary for the performance of a contract, for example to broadcasters/clients based in the USA and elsewhere. To ensure that your personal information is protected we have put in place the following appropriate measures to ensure that your information is treated by those organisations in a way that is consistent with EU and UK data protection laws, namely taking reasonable measures to ensure they meet or exceed the relevant legal or regulatory requirements for transferring data to them and keeping it secure.
- 3.4 We do not generally share your information with outside organisations other than for the purposes set out above and will not sell or provide information about you for direct marketing purposes without your consent.
- 3.5 We may share information with a third party where it is envisaged that the business, or part of the business in which you work, may be transferred to that third party (such as on a sale of the business or where a new contractor takes over services we provide). Where possible this will be anonymised but in some cases we may be required by law and under recognised due diligence practices to provide personal information including "special" personal information.

4 Why is it being collected and how will it be used?

- 4.1 We must process information about you lawfully, transparently, and fairly, which is the reason we provide this Privacy Notice. We gather information in order to comply with our contractual and (where applicable) employment law obligations and duties to you, and to ensure that you comply with your duties to us as an employee / freelancer / contractor / agent.
- 4.2 Our legal and contractual obligations include ensuring that you receive the correct pay and (if applicable) benefits, you and our other members of our personnel have a safe working environment, you have the correct equipment and training to undertake your work, and that we comply with (where applicable) our employment law obligations and other legal requirements.
- 4.3 We take data protection very seriously. As well as providing this Privacy Notice for our staff, we have a Data Protection Policy which outlines data protection law and how we handle all personal information, including the personal information of our customers, suppliers and contacts, and how we expect our staff to handle personal information in the course of their work with us. You must be familiar with the Data Protection Policy. Failure to adhere to the Data Protection Policy may result in disciplinary action against you or the termination of your contract.

5 On what legal grounds do we process your personal information?

- 5.1 We rely on a number of lawful reasons for processing your information. These are:
- 5.1.1 it is necessary for the performance of your contract with us; and/or

- 5.1.2 it is necessary for us to comply with our legal obligations, for example, in relation to tax and national insurance, compliance with (where applicable) employment and health and safety laws; and/or
 - 5.1.3 it is necessary for our legitimate interests, both in conducting our business, and ensuring that we are able to manage our personnel throughout the duration of their contract with us and beyond, where necessary; and/or
 - 5.1.4 where none of the other lawful reasons apply but it is necessary to protect your life or the life of someone else.
- 5.2 Where the personal information is one of the "special categories" (as described above), or relates to criminal convictions, the commission/alleged commission of criminal offences, or criminal proceedings, we will only process this information where:
- 5.2.1 it is necessary for our or your obligations or rights in the field of employment law (including those laws that apply to workers) or social security law (and for this purpose we have a separate policy document which is reviewed from time to time and which outlines how we protect such information and how long the information is held for); and/or
 - 5.2.2 the personal information has been manifestly made public by you; and/or
 - 5.2.3 it is necessary in relation to legal claims; and/or
 - 5.2.4 it is necessary for reasons of substantial public interest. UK law places our monitoring of diversity and equality of opportunity in this category providing certain safeguards are in place; and/or
 - 5.2.5 it is necessary to protect your life or the life of someone else and you are physically or legally incapable of giving consent.
- 5.3 There may also be circumstances where we will ask for your freely-given, specific, informed and clear consent to process certain types of information about you if it is not already covered by one of the lawful bases set out above.

6 What will be the effect on you?

- 6.1 We hope that you will enjoy your work with us. We endeavour to keep information about you confidential and limited to what is necessary.
- 6.2 In some cases, where the information is a statutory or contractual requirement, or necessary for your work contract, and you fail to provide certain information, there may be consequences for you. If that is the case, we will make sure we give you adequate opportunity to provide the information and to tell you the possible consequences of your failure to provide it.

7 How long will we process your personal information?

- 7.1 We will generally process this information for the duration of your work contract with us, in accordance with our usual data retention policies and procedures and any applicable laws (a copy of / link to the company's corporate data retention policy and any applicable programme-related data retention policy will be provided to you). We may retain some information after you have left our employment / cease to be engaged by us, where we are required to do so. Where you are engaged to work on a production, we will retain your personal information described at Clause 2.1.1 above for as long as we are exploiting the production in accordance with our legitimate interests and, where applicable, our legal obligations.

8 Your rights

- 8.1 Under data protection law, you have certain rights in relation to your information. You have the right to request from us access to your own personal information.
- 8.2 Additionally, you have the right to request from us:
- 8.2.1 that any inaccurate information we hold about you is corrected;
 - 8.2.2 that information about you is deleted in certain circumstances;
 - 8.2.3 that we stop using your personal information for certain purposes; and
 - 8.2.4 that your information is provided to you in a portable format.
- 8.3 We may not always be able to comply with your request in relation to these rights, which are limited to certain defined circumstances. We will tell you if that is the case and explain why.
- 8.4 If you make a request, we will aim to respond to you within one month. We will not charge you a fee for dealing with your request (unless your request is manifestly unfounded or excessive, such as where you make repeated requests). If you wish to exercise any of your rights, please contact the Data Protection Manager via e-mail at dataprotection.enquiries@Tinopolis.tv or via post to The Data Protection Manager, Tinopolis Group, No 1 Smith's Square, 77-85 Fulham Palace Road, London W6 8JA.
- 8.5 If you have any questions about this Privacy Notice, would like any further information or wish to complain about our use of information, please do contact the Data Protection Manager via e-mail at dataprotection.enquiries@Tinopolis.tv or via post to The Data Protection Manager, Tinopolis Group, No 1 Smith's Square, 77-85 Fulham Palace Road, London W6 8JA. If we cannot resolve your complaint, you have the right to complain to the Information Commissioner's Office, which is the statutory regulator for data protection matters. The Information Commissioner can be contacted at <https://ico.org.uk/concerns/>.