

PROGRAMME CONTRIBUTOR PRIVACY NOTICE

This notice explains how we handle your data when you take part in a programme we are producing. It includes the additional information at the end of the document (“Additional Information”) where we explain what we mean by “personal data”, “processing”, “special category data” and other terms used in the notice. This notice does not create contractual rights or obligations and may be amended by us at any time.

1. The data we hold and why we process it

We process data for the purposes of running our business including for production, broadcasting, distribution and marketing. The Additional Information section provides more specific information on these purposes, on the type of data that may be processed and on the grounds on which we process data.

2. Where the data comes from and who we share it with.

Some of the personal data that we process about you comes from you, which can include your name, age and email address. Other personal data about you is generated in the course of you taking part in the production and providing interviews and other filming contributions. It may be seen by our staff and contractors who are working on the production and we may also pass your data outside the organisation, for example for broadcast of the Programme itself, distribution and marketing purposes.

3. How long do we keep your personal data for?

We do not keep your personal data for any specific period but will not keep it for longer than is necessary for our purposes. In general, we will keep your personal data for so long as you take part in a production and for a period afterwards as we may need to refer to production paperwork and programme rushes for the purposes of programme compliance and legal reasons.

4. Transferring data outside the EEA.

We may transfer your personal data outside the EEA where we have a foreign server storage provider. If you featured in a production, the data constituting your performance may be transferred out of the EEA for programme broadcast, distribution and marketing purposes.

5. Your rights

You have a right to make a subject access request to receive information about the data that we process about you, as set out in the Additional Information.

6. Contact

In processing your personal data, we act as a data controller and our main point of contact for data-related matters is Paul Sommers.

Additional Information

1. Terminology

“**personal data**” is information relating to you that identifies you and includes not only facts about you, but also intentions and opinions about you.

Personal Data 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.

“**special category data**” is 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 “**special category data**”.

References in the Contributor Privacy Notice 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 for legitimately processing personal data. In some contexts more than one ground applies which are summarised below 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. For example, compliance with the Ofcom broadcast code or other regulation.
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 Special category data

If we process special category data about you, we will only carry this out for one of the permitted reasons under Schedule 8 of the Data Protection Act 2018, including where it is necessary at law or where there is substantial public interest in doing so.

4. Further information on data we process

The following is a short list of examples of what kind of personal data we may process and the grounds for doing so. 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
Engagement	Information concerning your taking part in our productions and our assessment of it, your references, any checks we may make to verify information provided or background checks. 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
Contacting you or others on your behalf	Your address and phone number, emergency contact information and information on your next of kin.	Legitimate interests
Enabling the creation, sale and distribution or broadcast of a production you are taking part in	Information connected with your participation including, the processing of images/ video/ audio of you.	Legal obligation Legitimate interests
Providing details in connection with your seeking to participate on other production	Information on your taking part in one of our productions.	Consent Legitimate interests
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
Day to day business operations including marketing and travel on our behalf	Information relating to your participation in a programme. This may include a picture or profile of you. Information regarding your travel arrangements and location.	Legitimate interests
Maintaining appropriate business records during and after your participation in a programme	Information relating to your participation in one of our productions.	Legal obligation Legitimate interests

If 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 participate in one of our productions, the initial data about you that we process is likely to come from you: for example, contact details

6. Who gets to see your data

Internal use: Your personal data may be disclosed to our employees working on your production.

External use: We will only disclose your personal data outside our company 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-ridden by your interests and rights in particular to privacy).

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.
- If you have an on-screen role, disclosure of footage, images, or audio recordings of you as part of the broadcasting, distribution and marketing of the production. Or, whether you have an on-screen or off-screen role, to allow us to credit your role.

7. Retaining your Personal Data

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 participation either as a record or in the event of a legal claim. Some data, such as production footage itself and credit information, will be kept indefinitely as we have an on-going legitimate interest in retaining the product.

8. 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
- 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, you have the right to be given the data in machine readable format for transmitting to another data controller. This only applies if the ground for processing is Consent.

If we have relied on consent as a ground for processing, you may withdraw consent at any time – though if you do so that will not affect the lawfulness of what we have done before you withdraw consent

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.