



FULWELL 73 LIMITED

PROSPECTIVE CONTRIBUTOR PRIVACY NOTICE

This Privacy Notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you when you provide contributions to us.

This Privacy Notice is for individuals who we are speaking to about potentially taking part in one of our productions.

Who collects information about you?

Fulwell 73 Limited ('Fulwell') is a 'data controller'. This means that we are responsible for deciding how we hold and use certain information about you.

What information do we collect about you?

You may provide certain information to us as part of your application to take part in one of our productions. This could be your name, age, email address and mobile number. We may also process your image, voice, photos of yourself, views of your property and other information contained in your application (where relevant) that identifies you.

How do we use your information?

We process your information for the purposes of our business, including for our productions.

As a 'data controller', we are required to have a legal basis for processing your personal data. We will use the information we collect about you for:

- *Your potential engagement.*

This includes processing of information concerning your application to work on, participate or appear in 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 basis for processing: To comply with our legal obligations and necessary for our legitimate interests to manage and administer our business effectively, where we consider that our legitimate interests do not override your own interests, rights and freedoms.

- *Evaluating your potential role on a production to enable its creation, broadcast, sale and distribution*

This includes processing of information connected with our potential role including, if you are in consideration for an on-screen or voiceover role, the processing of images, video or audio of you.

Legal basis for processing: To comply with our legal obligations and necessary for our legitimate interests to manage and administer our business effectively, where we consider that our legitimate interests do not override your own interests, rights and freedoms.



- *Providing details in connection with our seeking new engagements on other productions*

This includes processing any information relating to your potential role with us.

Legal basis for processing: Necessary for our legitimate interests to manage and administer our business effectively, where we consider that our legitimate interests do not override your own interests, rights and freedoms.

- *Monitoring of diversity and equal opportunities.*

This may include 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.

Legal basis for processing: Necessary for our legitimate interests to manage and administer our business effectively, where we consider that our legitimate interests do not override your own interests, rights and freedoms.

- *Physical and system security*

This includes any CCTV footage and records of use of swipe cards and similar entry cards.

Legal basis for processing: To comply with our legal obligations and where it is necessary for our legitimate interests to manage and administer our business effectively, where we consider that our legitimate interests do not override your own interests, rights and freedoms.

- *Disputes and legal proceedings.*

This includes any information relevant or potentially relevant to a dispute or legal proceeding affecting us.

Legal basis for processing: To comply with our legal obligations and where it is necessary for our legitimate interests to manage and administer our business effectively, where we consider that our legitimate interests do not override your own interests, rights and freedoms.

Who will you share my information with?

We may share your information internally within our group to those working on your production for the purposes of deciding whether to include you in a production.

We will only share your information with third parties outside our group where disclosure is consistent with a legal basis for processing on which we rely and where this is lawful and fair to you. We may disclose your information if it is necessary for our legitimate interests or the interests of a third party but will not do this if these interests are overridden by your interests and rights in particular to privacy.

Specific circumstances in which your information may be disclosed include:

- Disclosure to external recipients of electronic communications (such as emails) which contain your information;
- Disclosure of aggregated and anonymised diversity data to relevant regulators as



part of a formal request;

Transfers of information outside the EEA

In connection with our business and for production, broadcasting, distribution, administrative, management, marketing and legal purposes, we may transfer your information outside the EEA to members of our group and data processors in the US and on occasion other jurisdictions in which we are established. Whenever we transfer your information outside the EEA, we ensure a similar degree of protection is afforded to it by ensuring appropriate safeguards are implemented. Please contact us if you want further information about the specific mechanism used by us when transferring your personal information outside the EEA.

Keeping your personal information secure

We have put in place appropriate security measures to prevent your information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have also put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How long will you keep my information for?

We will keep the information we obtain about you when you provide contributions to us for no longer than is necessary for the purposes for which it is processed. In general, we will keep your information until the production 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 contribution either as a record or in the event of a legal claim.

Personal data relating to contributor applications (other than the person who is successful) will normally be deleted after 12 months unless we have told you that we plan to hold on to your details to contact you about future shows and you have not opted out from such communications.

Your rights

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal



- information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we restrict processing your personal information, please contact our Head of HR in writing at privacy@fulwell73.com.

Please note that if your request is about your contribution itself, we (or third parties, such as the Commissioner for our production) may rely on 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 EU General Data Protection Regulation and in various national laws, including for example in Schedule 2 Part 5 of the UK's Data Protection Act 2018).

Who to contact with queries or if you have a complaint

Our Head of HR is responsible for overseeing compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Head of HR at privacy@fulwell73.com. We hope that any query or concern you raise about our use of your information can be resolved but if not, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. See <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

Changes to this Privacy Notice

This Privacy Notice does not form part of your contract and we may amend it at any time. Please check our website at <https://www.fulwell73.com> for the latest version of our Privacy Notice.