



FULWELL 73

FREELANCER, CREW AND SUPPLIER 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 contract to work on our productions, including those in production roles and crew members, as well as those individuals who have previously carried out these roles on our productions. It also applies to our suppliers (including individuals who work for our suppliers).

Who collects information about you?

Fulwell 73 Limited ('**Fulwell 73**') 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?

Freelancers and Crew

You provide certain information to us when you start working on one of our productions. This might include contact details, bank details, information relating to your right to work, details of references and any information we may require to carry out background checks.

While you are working on one of our productions, we may also receive information about you from others. For example, information from managers and our employees (such as those individuals involved in the production you are working on) or information about your use of our IT systems, where relevant.

Suppliers

We need a small amount of information from our suppliers to ensure that our contract runs smoothly. For example, we need contact details of relevant individuals (such as names, telephone numbers and email addresses) so that we can communicate with you. We also need other information, such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us). We may also hold extra information that someone in your organisation has chosen to tell us from time to time.

How do we use your information?

We process your information for the purposes of our business, including for production, broadcasting, distribution, marketing, management, administrative and legal purposes.

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 as follows:

Freelancers and Crew

- *The performance of the contract and relationship between you and us.*

This includes processing of information concerning your engagement to work on our



productions, our assessment of it, your references and any checks we may make to verify information provided or background checks, your role, the duration of your contract and your remuneration. It may also include information relating to the terms on which you are engaged and any proposal to change the scope of your role, the level of remuneration or to end your contract.

If relevant, we may also process information concerning your health, any disability and in connection with any adjustments to working arrangements.

Legal basis for processing: (1) To perform our contract with you, (2) To comply with our legal obligations and, (3) 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.

- *Payroll Administration*

This includes processing of information connected to payment of your fee, including bank account details and tax, NI and pension contributions (if applicable). It may also include processing of time sheets and any sickness or holiday forms.

Legal basis for processing: (1) To perform our contract with you, (2) To comply with our legal obligations and, (3) 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.

- *Financial planning and budgeting*

This includes processing of information connected with your remuneration.

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.

- *Contacting you (or others on your behalf) in connection with your engagement.*

This includes processing any contact information you have provided to us, including your address and phone number, emergency contact or next of kin information.

Legal basis for processing: (1) To perform our contract with you and, (2) 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.

- *Enabling the creation, sale and distribution/broadcast of a production you are taking part in.*

This includes processing of information connected with your role on our production including any records of documents and emails created by or relating to you and information about your use of our IT systems and equipment including computers, laptops or other devices (if applicable). It may also include information relating to your compliance with our policies.

Legal basis for processing: (1) To perform our contract with you, (2) To comply with



our legal obligations and, (3) 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 references in connection with your engagement with us where you are seeking work with other companies*

This includes processing information regarding your engagement with us, including details of your performance in relation to your role.

Legal basis for processing: Consent

- *Providing information to third parties to whom we may choose to sell, transfer, or merge parts of our business, or in connection with other transactions that we contemplate or carry out*

This includes processing information on your contract and remuneration in relation to a particular production as may be required by a prospective purchaser, seller or other relevant third party.

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.

- *Monitoring and investigating compliance with policies, rules and procedures*

This includes information regarding your use of our IT systems such as access logs, email logs, and any other relevant records of usage. It may also include any CCTV footage.



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: (1) To comply with our legal obligations, and (2) 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.

- *Day to day business operations including marketing and travel on our behalf (where relevant).*

This includes information relating to your contribution in a production and may include a photograph or profile of you as well as details of travel arrangements and location.

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.

- *Maintaining appropriate business records during and after your contract with us ends.*

This includes information relating to your contract and anything you do whilst engaged by us.

Legal basis for processing: (1) To perform our contract with you, (2) To comply with our legal obligations and, (3) 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.

Suppliers

- *The performance of the contract and managing our relationship with the supplier.*

This includes processing of information to store (and update when necessary) your contact details on our database, so that we can contact you in relation to our agreements.

Legal basis for processing: (1) To perform our contract with you, (2) To comply with our legal obligations and, (3) 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: (1) To comply with our legal obligations, and (2) 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 employees working on your production (where relevant). Your information may also be seen by managers and administrators (including, for example, our finance team) for purposes of production, broadcasting, distribution, marketing, administration and management.

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 to organisations that process data on our behalf such as our payroll provider, insurers, our bank and the third-party hosting provider that hosts our IT systems and data;
- Disclosure of aggregated and anonymised diversity data to relevant regulators as part of a formal request;
- Disclosures related to the broadcasting, distribution and marketing of the production, and to allow us to credit your role (where applicable)

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. [Some of our systems are hosted outside of the EEA.] 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 through your engagement with us for no longer than is necessary for the purposes for which it is processed. In general, we will keep your information for the duration of your contract 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.

Some information, such as credit information (in relation to someone working on our productions), will be held indefinitely as we have an ongoing legitimate interest in retaining this.

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 we have relied on consent as a legal basis for processing, you may withdraw your consent at any time.

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.

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 www.fulwell73.com for the latest version of our Privacy Notice.