



## DATA PROTECTION POLICY

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Cornelia Street Productions (**we, us**), are committed to protecting the data that we hold and use about you and to respecting your privacy.

We are confident that you will find the information that you need set out in this policy, but if you need to know more about the data that we hold or the way that we use it, you can contact us by email at "hello@corneliastreetproductions.co.uk" by post at "Cornelia Street Productions Ltd, 34b Ashley Road, London N19 3AF" or by telephone on 0207 272 4692.

This policy covers:

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### 1. About this policy

This policy (together with any other documents that we may refer to within this policy) describes the data that we collect from you or about you during the course of our business, and the way that we use it. Please read the policy carefully as it will help you to understand the way that we use your data and our reasons for doing so.

The "data controller" of your personal data (in other words, the organisation that determines how your data is used) is Cornelia Street Productions Limited (company number 11253951) with registered address: Wisteria Grange Barn Pikes End, Pinner, London, England, HA5 2EX.

### 2. The way that we use your personal data

#### A. What personal data do we collect?

"Personal data" is any information that could be used to identify you in some way. The personal data that we collect from or about you may (depending on our relationship with you) include the following:

- name;
- address;
- e-mail address;
- phone number;
- financial information such as your bank details where we need to make a payment to you;
- details about your visa or your passport details (only where we need to assess your right to work in the UK);

- any personal data that you give to us or that we gather in connection with a production such as images or video of you, voice recordings and other information concerning you. We will only collect this type of data where we are producing a production involving or about you or to which you are a contributor, and we will make sure that you have been notified of this in advance;
- any personal data you give to us in our general communications with you (for example when you make an enquiry via email, interact with us on social media or speak to someone from the team over the phone);
- information about your computer and about your visits to and use of our website (including information about how and when you came to visit our website, how you interacted with the website (page response times, download errors, length of visit to certain pages, page interaction information such as scrolling, click, and mouse-overs) and where you went next (including full URLs and methods used to browse away from the site);
- technical information about the way you access our website including your IP address, geographical location, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, and device information; and
- data regarding your health, only where we are required to do so for insurance purposes or as otherwise required in connection with our legal obligations (e.g. under Health and Safety or Employment Law);
- we may need to ask you whether you have any criminal convictions (only where we are required and permitted to undertake criminal records checks).

#### **B. How do we collect personal data?**

We collect personal data in a variety of ways including:

- **directly from you:** when you voluntarily provide this information to us (for example when you contact us using our website or if you agree to work on one of our productions);
- **from other publically available sources:** from time to time, we access and store information which is available from public sources including some personal data (for example, we will collect publicly available information as part of our research for our productions);
- **from a co-production company:** where we are collaborating with another production company in a co-production arrangement we may receive certain personal data from that production company;
- **otherwise through your browser or device or through our servers:** certain information is collected by most browsers or automatically through your device, and we also collect your IP address or other device identifier (this enables us to recognise your computer or device when you use the site) via our server log files.

We do not currently collect data about you from any other sources, but if this changes we will update this privacy policy.

**C. How do we use personal data, and what is our justification for doing so?**

We use your personal data for a variety of purposes related to the day to day running of our business and creating our productions. From a legal perspective, there are various reasons and justifications for doing so and we have set out an explanation of this below.

<i>In order to produce our productions and other products:</i>	
<ul style="list-style-type: none"> <li>• where we have entered into an agreement with you to help us or otherwise work with us on a particular production we will need to process personal data to fulfil our agreement with you (such as to ensure you get paid);</li> <li>• we research and collect information generally in order to create our productions and documentaries; this may include some personal data and we use it to ensure our documentaries and other productions are accurate and well informed in accordance with regulator guidance (such as the Ofcom broadcasting code) and applicable laws;</li> </ul>	<p>We use your data in this way either because we have a contract with you or because it is in our legitimate interests to do so (for example it is in our legitimate interests to ensure that our documentaries and productions are accurate and fairly produced) but we will always ensure that your rights are protected.</p>
<i>For marketing purposes, including to measure how effective our marketing it:</i>	
<ul style="list-style-type: none"> <li>• to send you our newsletter or other marketing communications relating to our business and our productions which we think may be of interest to you by post, or where you have agreed to it, by email or similar technology;</li> <li>• to measure the effectiveness of our marketing campaigns and our advertising;</li> </ul>	<p>We rely on your consent to contact you directly by email about our business and any projects or production we are involved with. In other scenarios, we will rely on our legitimate interests as a business, always ensuring that your rights are protected. You can inform us at any time if you no longer wish to receive marketing communications.</p>
<i>For administrative and internal business purposes:</i>	
<ul style="list-style-type: none"> <li>• for our internal business purposes, such as analysing and managing our businesses, audits, enhancing our offering including on our website, and identifying trends. For these purposes, personal data will be aggregated and looked at on a statistical basis;</li> </ul>	<p>It is in our legitimate interests as a business to use your data in this way. For example, we have a clear interest in ensuring that our site works properly and that our products and services are high quality and efficient. We will always ensure that your rights are protected.</p>

<i>For insurance purposes</i>	
<ul style="list-style-type: none"> <li>• for insurance purposes such as to ensure we have adequate health insurance in place for our productions;</li> </ul>	<p>In some cases, we will need to use your personal data to fulfil a legal obligation to have insurance in place and/or we will be relying on a statutory basis to process your personal data in this way. In other cases we may seek your explicit consent to process your personal data in this way.</p>
<i>For security and legal and compliance purposes:</i>	
<ul style="list-style-type: none"> <li>• to ensure anyone we work with has the right to work in the UK;</li> <li>• for taxation purposes such as to comply with tax laws;</li> <li>• as part of our efforts to keep our website safe and secure;</li> <li>• to detect or prevent fraud or other illegal activity;</li> <li>• as we believe to be necessary or appropriate in each case in order to comply with laws or legal process (including laws or legal process in other countries); and</li> <li>• to protect our rights or property (or the rights or property of others) and to enforce our rights and pursue available remedies.</li> </ul>	<p>In some cases, we will need to use your personal data to fulfil a legal obligation (for example, if we receive a legitimate request from law enforcement agencies), and in other cases (such as the detection of fraud or ensuring the security of the site) we will rely on our legitimate interests as a business to use your data in this way.</p>

**D. How do we share your personal data?**

We will never sell your personal data or give it to anyone else for them to use for their own purposes without making that clear to you. There are, however, various ways in which we will share your data, as set out below:

*(i) Sharing data with other production companies in co-production arrangements:*

We often work closely with other production companies in contractual co-production arrangements to create our productions and documentaries. In such cases, the co-producer may also have access to personal data about you or we may be given access to personal data about you from the co-producer. In these situations the co-producer may be a separate data controller or a joint data controller. Where this occurs, we will enter into an agreement with the co-producer which clearly sets out our respective rights and responsibilities for protecting your personal data, being transparent about the way your personal data is used and otherwise complying with applicable data protection laws.

(ii) Cast and crew access to personal data:

The cast and crew on our productions often work with us on a freelancer or contractor basis. This means that from a legal perspective, they are separate processors of any personal data we share with them. We will only share your personal data with freelancers and contractors to the extent that they need this information to provide the relevant services to us. We will always make sure that we instruct and appoint individuals that we trust.

(iii) Sharing with organisations providing services to us:

We engage various third parties to provide services to us for specific functions, and this will often mean that we need to share your personal data with them (it is in our legitimate interests to do so, since we may not have the capabilities to provide these services ourselves).

For example, we use a third party company to store and 'host' electronic copies of our documents and correspondence. We also use the website analytics provider, Google Analytics, to help us understand how our website is used (this information is aggregated and looked at on a statistical basis only). For more information about Google Analytics please read Google's analytics notice which is available here: <https://support.google.com/analytics/answer/6004245?hl=en>

In every case, we will ensure that these third parties are only allowed to use your personal data in order to provide the relevant services to us. We will always make sure that we use organisations that we trust to look after your personal data appropriately and as required by applicable laws.

From time to time we will also need to share some personal data, including personal data in relation to your health, with our insurers. We will only pass information to the insurer that it needs to provide adequate insurance for a particular production and will always make sure we use insurers we trust to keep your personal data in the strictest confidence and as required by the law.

(iv) Sharing data in connection with changes to our group structure or the ownership of our business:

If we sell or propose to sell our business or part of it, we may need to disclose your personal data to prospective buyers. Similarly, if our ownership structure changes, we may need to disclose your personal data to the new owners or operators of our website as part of that process.

(v) Sharing data to comply with laws:

There may be scenarios where we are subject to a legal obligation to disclose or share your personal data, such as with law enforcement agencies or public authorities in order to prevent or detect crime.

**International transfers of personal data**

In some scenarios, we may transfer some personal data to organisations outside of the European Economic Area (the "EEA"). This will happen when we are collaborating

with an international co-producer who is based outside of the EEA and certain personal data needs to be shared in connection with the production (please see further information above) or where we have been commissioned by a broadcaster based outside of the EEA. When this occurs we will make sure that we take steps necessary to protect your data as required by applicable laws, for example by implementing appropriate safeguards including by agreeing appropriate contract terms with the recipient of the data.

### **3. Security and retention of your personal data**

#### (i) Security of your personal data:

We will ensure that appropriate technical and organisational measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data and we have in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction.

#### (ii) Retention of your personal data:

We will only retain your personal data for as long as is necessary for the purposes described in this privacy policy. This means that the retention periods will vary according to the type of the data and the reason that we have the data in the first place for example we are required to hold some personal data for at least 7 years to comply with tax obligations. As a general rule, we will store personal data for 10 years because it is in our legitimate interests to do so in order to manage our productions, however, other personal data may be kept for a shorter period for example we will not store bank or other payment details following any final payments.

### **4. Your rights and how to contact us**

The law gives you a number of rights in relation to your personal data and our use of it. You have the right:

- (a) to ask us not to use your personal data for direct marketing purposes;
- (b) to ask to see what personal data we hold about you and to find out about the way that we process the data (and in some circumstances, you can ask us to provide a copy to a third party);
- (c) to ask us to correct or update any personal data which is inaccurate;
- (d) to ask for personal data to be deleted in some (but not all) circumstances where there is no good reason for us to continue to process it;
- (e) to ask us to temporarily stop using your data if you don't believe that we have a right to use it, or to stop us from using your personal data where there is no good reason for us to continue to use it; and
- (f) not to be subject to decisions made solely on the basis of 'automated processing' (i.e. the right not to be subject to decisions made solely by algorithms or computers without input from a human) in certain circumstances.

Where your personal data has been included as part of a production that has been broadcast or otherwise made available to the public including online or on a social media platform (or any content from the production has been broadcast or made

available, including by being posted to a website or on a social media platform) such content may be accessed, recorded, distributed, altered, downloaded, stored or copied by other third parties. We will do everything we reasonably can to support you in the exercise of your rights (for example, we may in some cases (where your rights and our legal obligations require us to do so) be able to restrict further broadcasting of the production and remove any content from our own website or social media platforms) but the retrieval or removal of the content from the internet more broadly is likely to be outside of our control.

If you would like to exercise any of the rights listed above, or if you have any queries or concerns about the way that we use your personal data (or any questions about this privacy policy), you can contact us by email at "hello@corneliastreetproductions.co.uk" by post at "Cornelia Street Productions Ltd, 34b Ashley Road, London N19 3AF" or by telephone on 0207 272 4692.

You also have the right to complain about our use of your personal data. You can contact the Information Commissioner's Office via their website: <https://ico.org.uk/concerns/> or by calling 0303 123 1113.

#### **5. Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this site. We may also email you with any changes if we have your email address. Please check back frequently to see any updates or changes to our privacy policy.