

# H \_ DDEN L \_ GHT

## External Privacy Policy

This privacy policy sets out how HiddenLight Productions collects and processes your personal information. We are committed to ensuring that your privacy is protected. If we process your personal information, we will only do so in accordance with this privacy policy and data protection law.

### Who are we?

HiddenLight Productions is an independent television production company based in London that produces premium programming and other content for worldwide distribution.

Our contact and registration details are as follows:

Company Name: HiddenLight Productions Limited

Country of Registration: England and Wales

Company Number: 12417657

VAT Number: 351812514

Registered Office: 1 St Johns Lane, London, EC1M 4BL

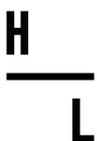
Tel: 020 7602 8163

Email: [info@hiddenlight.com](mailto:info@hiddenlight.com)

### Why do we collect and process personal information?

We collect and process personal information for various reasons in the operations of our business including:

- operating and managing our business effectively and lawfully;
- contacting individuals about taking part in our programmes and assessing their suitability to take part in our programmes;
- as part of and in connection with our programme-making and other activities;
- producing, exhibiting, exploiting, distributing, publicising, advertising and promoting our programmes by any media (now known or hereafter invented) throughout the world;

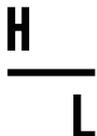


- responding to queries from members of the public;
- making payments to individuals; and
- for marketing purposes.

### **What Personal Information do we collect and why?**

We process a lot of information in the course of our business. Depending on our interaction with you, we may process the following information about you:

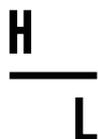
1. your name, your gender, your age and date of birth, your address and contact details such as your email address and telephone number, your handwriting as well as other basic details about you. We need this information to correspond with you and to contract with you and for administrative and other purposes.
2. your image, your gender, your age and birth date, information contained within your passport, your driving licence and possibly other official documents which identify you. We need this information to check your identity and to ensure compliance with relevant laws and regulations.
3. information about your past and present personal, home and family life. We need this information to be able to assess your suitability to take part in our programmes and to comply with our contractual and regulatory obligations.
4. information about your past and present professional life including information about your current role and schedule, your previous work history, your qualifications and your experiences. We need this information for administrative purposes, to be able to assess your suitability to take part in our programmes and to comply with our contractual and regulatory obligations.
5. whether you consent or object to being identified in our programmes and if you object, the basis of your objection. We need this information to assess your suitability to take part in our programmes and to comply with our contractual and regulatory obligations.
6. information about you that is on social media and the internet including images of you and other personal information that is contained there. We need to process this information in order to verify your identity and to assess your suitability to take part in our programmes.
7. your financial details such as your bank details. We may need this information in order to reimburse pre-approved expenses.



8. information concerning your physical and mental health. We need this information in order to assess your suitability for participation in our programmes, and for compliance with contractual obligations we have to third parties, who are subject to statutory regulation.
9. information concerning any criminal convictions or cautions you may have, any criminal activity you may have been involved in and any current criminal proceedings or criminal allegations that relate to you or in which you are involved. We need this information in order to assess your suitability for participation in our programmes; and for compliance with contractual obligations we have to third parties, who are subject to statutory regulation.
10. your age, gender, gender identity, ethnicity, disability and sexual orientation. We will use this information for diversity analysis monitoring.
11. any personal information revealed on camera and contained in footage filmed for our programmes (collected by us or provided to us by a third party in connection with our programmes) including your image and voice and potentially a very wide range of personal information relating to you revealed by you and others including without limitation:
  - 11.1 your name; your gender; your age and date of birth; your address and contact details; information about your past and present personal, home and family life and professional life including information about your current role such as your position and work schedule, your previous work history, your qualifications and your experiences;
  - 11.2 information concerning your racial and ethnic origin, political opinions, religious or philosophical beliefs, your membership of a trade union, your health and any medical treatment you receive, your sex life or your sexual orientation (“special category data”); and
  - 11.3 information concerning any criminal convictions or cautions you may have and any other criminal activity you may have been suspected of or involved in; information concerning the nature and status of any arrests, charges, prosecutions, court proceedings or other interactions between you and the authorities; and information about any criminal behaviour you have witnessed or which has affected you and any related police investigation or prosecution (“criminal convictions and offences data”).
12. your name and contact details for marketing purposes where you have opted to receive communications from us or from third parties that we believe may offer services/events or products that are of interest to you.

### **Lawful Bases for processing personal data**

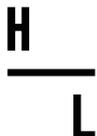
The first column of the following table refers to the types of personal information set out in the numbered paragraphs above. The second column lists the lawful bases we rely upon in order to process these types of data.



Para	Lawful Basis
1	Processing is: <ul style="list-style-type: none"> <li>• necessary for the purposes of our legitimate interests and others e.g. the commissioning broadcaster of our programmes</li> <li>• necessary for the performance of our contract with you or in order to take steps prior to entering into the contract.</li> </ul>
2	Processing is: <ul style="list-style-type: none"> <li>• necessary for the purposes of our legitimate interests and others e.g. the commissioning broadcaster of our programmes</li> <li>• necessary for the performance of our contract with you or in order to take steps prior to entering into the contract.</li> </ul>
3	Processing is necessary for the purposes of our legitimate interests and others e.g. the commissioning broadcaster of our programmes
4	Processing is necessary for the purposes of our legitimate interests and others e.g. the commissioning broadcaster of our programmes
5	Processing is: <ul style="list-style-type: none"> <li>• necessary for the purposes of our legitimate interests and others e.g. the commissioning broadcaster of our programmes</li> <li>• necessary for the performance of our contract with you or in order to take steps prior to entering into the contract.</li> </ul>
6	Processing is necessary for the purposes of our legitimate interests and others e.g. the commissioning broadcaster of our programmes
7	Processing is: <ul style="list-style-type: none"> <li>• necessary for the purposes of our legitimate interests and others e.g. the commissioning broadcaster of our programmes</li> </ul>



	<ul style="list-style-type: none"> <li>necessary for the performance of our contract with you or in order to take steps prior to entering into the contract.</li> </ul>
8	<p>Processing is:</p> <ul style="list-style-type: none"> <li>necessary for the purposes of our legitimate interests and others e.g. the commissioning broadcaster of our programmes and / or</li> <li>necessary for the performance of our contract with you or in order to take steps prior to entering into the contract; and</li> <li>undertaken with your explicit consent.</li> </ul>
9	<p>Processing is:</p> <ul style="list-style-type: none"> <li>necessary for the purposes of our legitimate interests and others e.g. the commissioning broadcaster of our programmes and / or</li> <li>necessary for the performance of our contract with you or in order to take steps prior to entering into the contract; and</li> <li>undertaken with your explicit consent and / or</li> <li>undertaken in connection with public interest journalism.</li> </ul>
10	<p>Processing is:</p> <ul style="list-style-type: none"> <li>necessary for the purposes of our legitimate interests and others e.g. the commissioning broadcaster of our programmes; and</li> <li>undertaken with your explicit consent.</li> </ul>
11	<p>Processing is:</p> <ul style="list-style-type: none"> <li>necessary for the purposes of our legitimate interests and others e.g. the commissioning broadcaster of our programmes;</li> <li>necessary for the performance of our contract with you or in order to take steps prior to entering into the contract.</li> </ul>
11.1	<p>Processing is:</p> <ul style="list-style-type: none"> <li>necessary for the purposes of our legitimate interests and others e.g. the commissioning broadcaster of our programmes; and / or</li> <li>necessary for the performance of our contract with you or in order to take steps prior to entering into the contract.</li> </ul>



11.2	<p>Processing is:</p> <ul style="list-style-type: none"> <li>• necessary for the purposes of our legitimate interests and others e.g. the commissioning broadcaster of our programmes; and / or</li> <li>• necessary for the performance of our contract with you or in order to take steps prior to entering into the contract; and</li> <li>• undertaken with your explicit consent; and / or</li> <li>• undertaken in connection with public interest journalism.</li> <li>• In addition, following exploitation of our programmes, such information contained within the programmes may be information manifestly made public by you and if so we will rely on the relevant provisions of the DPA 2018 for any further processing of that information.</li> </ul>
11.3	<p>Processing is:</p> <ul style="list-style-type: none"> <li>• necessary for the purposes of our legitimate interests and others e.g. the commissioning broadcaster of our programmes; and / or</li> <li>• necessary for the performance of our contract with you or in order to take steps prior to entering into the contract; and</li> <li>• undertaken with your explicit consent; and / or</li> <li>• undertaken in connection with public interest journalism</li> <li>• In addition, following exploitation of our programmes, such information contained within the programmes may be information manifestly made public by you and if so we will rely on the relevant provisions of the DPA 2018 for any further processing of that information.</li> </ul>
12	<p>Processing is undertaken with your explicit consent, which you may revoke at any point by clicking the unsubscribe link at the bottom of each email sent to you.</p>

If the basis of our processing of your personal information is ‘consent’ you have the right to withdraw your consent at any time. However, note that your data may be being processed subject to another lawful basis as set out above.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Please contact us if you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose.



Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Where we collect your personal information from**

We may collect information about you directly from you when you contact us, complete electronic and/or paper forms we provide to you, enter our competitions and promotions, contact us by phone, email or communicate with us directly in some other way or from third parties.

### **Who we share your personal information with:**

Your personal information is processed by our employees, staff and contractors. We also may need to share your personal information with other organisations including with:

- third party service providers and advisors such as companies that support our IT, help us analyse the data we hold, send communications to our customers, provide us with legal or financial advice and generally help us deliver our services to you;
- companies involved with our business activities e.g. broadcasters, post-production houses, sales agents and distributors;
- The Government or our regulators e.g. Ofcom where we are required to do so by law or to assist with their investigations; and
- Police and law enforcement where we are required to do so by law to assist with the investigation and prevention of crime.

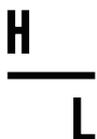
### **Transferring your personal information internationally**

Although we are based in the UK, our business is global and so we may need to transfer your personal information outside the European Economic Area (EEA).

Wherever your information is transferred to organisations outside the EEA, we will ensure that adequate safeguards are in place to ensure the safety and security of your personal information and that it is processed in accordance with this privacy policy.

### **Retention, updating and removal of your personal information**

We will only keep your personal information for as long as we need to. For those participating in our programmes, we are likely to retain your personal information for as long as is necessary in order to produce, exhibit, exploit, distribute, advertise, publicise and promote the programme in accordance with our legitimate interests and legal obligations.



To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Personal information that is no longer required will be deleted/destroyed.

If you think we hold personal data about you that is inaccurate or incomplete, you can contact us using the details in paragraph below called "Contacting us" and, where appropriate, we will update the relevant personal information for you.

We will notify you and any applicable regulator of a breach of our obligations under data protection laws, where we are legally required to do so.

## **Security**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. e.g. by storing it securely, and by keeping electronic data on secure servers and hard drives with appropriate levels of security including encryption and firewalls. However, the internet is an open system and we cannot guarantee that unauthorised third parties will never be able to defeat those measures.

## **Your rights in relation to your personal information**

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to opt-out of receiving direct marketing messages;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the blocking or deletion of your personal information where the processing does not comply with applicable data protection laws and; and
- the right to request that your personal information is provided to you in a portable format.

To exercise any of the above rights, or if you have any questions or concerns relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

Most of these rights are not absolute and are limited to defined circumstances, however, so we may not always be able to comply with any related requests you may make.

If you make a complaint about our handling of your personal information, it will be dealt with in accordance with our complaints handling procedure. We will respond to you within 28 days. Generally, you will not have



to pay a fee for this. We can charge a reasonable fee should your request be clearly unfounded, excessive or repetitive.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

If we are unable to resolve your complaint, you may make a complaint to the Information Commissioner's Office: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Please see <https://ico.org.uk/make-a-complaint/> for more information.

### **Changes to this privacy notice**

This Privacy Policy was last updated in April 2019. We will update it in line with legislative requirements

### **Contacting us**

If you need to contact us about this policy or any matters relating to the personal information we hold on you, you can write to us at HiddenLight Productions Limited, 1 St Johns Lane, London, EC1M 4BL or email us at [info@hiddenlight.com](mailto:info@hiddenlight.com)

