



NEVISION

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Data Protection Policy

Nevision Ltd. is an independent production company with offices in the UK and internationally. Our UK Head office is registered at 88 Baker Street, London W1T 6TQ. The Nevision Group Companies (referred to in this Notice as “the Company” or “we”) includes Nevision Studios South, NS1, NS2, NS3, NS4 & NS5, Nevision Inc in the USA, and Nevision SP in Spain.

Introduction

Nevision is the data controller of the personal data we collect from and about you. We are committed to safeguarding your information and will hold your data in line with current data protection legislation and best practice in line with industry standards.

It is important that you read this Privacy Notice together with any additional Privacy Notices which may be specific to a production, so that you are fully aware of how and why we are collecting and using your data. This Privacy Notice supplements these other notices (if provided) and is not intended to override them.

This Privacy Notice was last updated on 2nd April 2024

Why Do We Collect Personal Data?

The Nevision Group collects data for operational purposes and for the purposes of its core business activities, namely television and film production and distribution activities (including the production, promotion, administration, exploitation, insurance, and management of Nevision produced content).

Nevision processes personal data for the Nevision Group on the basis that it is in our legitimate interests, or the legitimate interests of third parties with whom we share personal data, to carry out such Nevision business. The Nevision Group may also process personal data to fulfil legal obligations, including regulatory and compliance requirements. In certain circumstances as necessary for Nevision's Business, we will process special category data (data concerning race, ethnic origin, politics, religion, trade union membership, genetics, biometrics (where used for ID purposes), health, sex life or sexual orientation) and criminal offence data. Such personal data is only collected where it is absolutely necessary and proportionate to do so.

Personal Data We May Collect:

We may collect data or may have data collected about you. We refer to such information as **Personal Data** and this may include:

- **Personal details** such as your name, address, email address, IP address, gender, date of birth, age, phone number, passport details or other national identifier, driving licence, your national insurance or social security number and income, marital/civil partnership status, domestic partners, dependents, emergency contact information and photographs, employment status employment information and personal history, emergency contact information and photographs, employment status (eg active, inactive, maternity replacement).
- **Documentation Required under Immigration Laws:** Citizenship, passport data, details of residency or any work permit (if relevant).
- **Talent Management Information:** Details contained in letters of application and resume/CV (e.g., previous employment background, education history, professional qualifications, language and other relevant skills, certification, certification expiration dates).
- **Special Category Data:**

If relevant to the project we are working on, the information we hold may include special category data such as medical information, accessibility requirements, political opinions, sexual orientation, financial situation, home life, family life and relationships and where

relevant your criminal history. We may collect information about your disability status to consider whether we need to provide appropriate adjustments during a shoot or interview process. In respect of special category data, collection of this information is only collected where it is absolutely necessary and proportionate to do so and this will be explained to you in advance where appropriate and a supplemental Privacy Notice may be provided to you either by us or on behalf of our Broadcaster.

- **Criminal Offence Data:**

We do not envisage processing information about any criminal convictions unless we are required to carry out those checks for a particular role by law or as required by a broadcaster or if the role requires a high degree of trust and integrity. We will inform you in advance at the time if we need to carry out any criminal record or other required checks and the legal basis for those checks.

- If appropriate given the nature of the role eg if the project involves contact with children, we may need to carry out enhanced/ standard or request a basic Digital Barring Service checks.

- **Diversity Reporting:**

- With your consent, we may pass your email address to Silvermouse and Soundmouse, who may contact you as part of our commitment to monitoring diversity as part of the Diamond project. This is the diversity monitoring system managed by the Creative Diversity Network on behalf of UK broadcasters BBC, ITV, Channel 4, Sky, Channel 5/Viacom. You can find out more about Diamond here https://creativediversitynetwork.com/wp-content/uploads/2018/09/Diamond_Guidelines_2018-FINAL.pdf

Where this information may be collected from:

- Yourself (or an Agent working on your behalf)- this includes information you may supply to us in pre-production stage in correspondence via email, letter, text message or discussed in telephone conversations; online via pre-production questionnaires or applications; contracts or written agreements such as release forms and any information sent to us via email, text message or social media messaging.
- Via an Agent or agency working on your behalf;
- Via publicly available databases, directories and sources such as Talent Manager, Production Base, or LinkedIn that may share your CV or other personal information;

- Your publicly accessible social media profiles (e.g. Facebook, Twitter, Youtube, Instagram and Snapchat). Please note any information you provide to those platforms is subject to their Privacy Notices which we would encourage you to read and make yourselves aware of;
- Online searches of publicly available information;
- Government agencies, tax authorities and other regulatory bodies based in the UK or internationally;
- Gathering of information during the pre-production research stage;
- Gathering information during filming;
- Gathering information during filming in a public place where you are involved in a story, where we exercise our right to include you in the content we will be producing;

- **How Do We Manage Your Personal Data?**

We process your personal data through both electronic and manual means and it is protected by reasonable security measures. We will take appropriate administrative, technical, personnel and physical measures designed to protect personal data that are consistent with applicable privacy and data security laws and regulations that include protecting personal data from misuse or accidental, unlawful or unauthorised destruction, loss, alteration, disclosure, acquisition or access. This includes requiring service providers to use appropriate measures to protect the confidentiality and security of personal data.

Why We Process Your Data:

Access to personal data within the Companies will be limited to those who have the “need to know” for the purposes described in this Privacy Notice. We will process your personal data in compliance with applicable laws for the following purposes:

- **Public Interest:** The development or production of content which is the subject of a story which is journalism or other public interest programming. We may need to process your information in order to consider your contribution to our project, be it as an on or off-screen contributor, interviewee, actor, narrator or contractor;
- **Programme Making:** We obtain personal information about you when you apply to participate in one of our programmes, or in the creation of other content or material for the Nevision Group; when you are included in or are the subject of our journalism or other

public interest programming, enter into discussions with us about a role in a programme, are confirmed as a participant or contributor to a programme. We need to process this information to enable us to consider your application, proposed role or contribution in a programme or other content or material for us, or to discuss your proposed role in these projects, or to carry out our journalistic activities;

- **Communications and Emergencies:** We obtain personal information about you in order to facilitate communication with you at the pre-production, filming or post production stage and to keep you updated about the project;
- **Health and safety:** Complying with legal obligations on health and safety matters;
- **Compliance:** Complying with legal and other requirements, including audits, inspections and other requests from government or other public authorities such as OFCOM;
- **Dispute resolution,** responding to legal process such as subpoenas, pursuing legal rights and remedies;
- **Marketing of Project:** Fulfilling our contractual obligations to allow your contribution to be used in the marketing and publicity of the project to which you have contributed;

Who Can Access Your Personal Data?

All Management personnel within the Nevision Group will generally have access to your business contact information such as name, position, telephone number, business postal address and email address.

We may share your personal data for the purposes specified in this Privacy Notice with the following categories of entities that can be located within and, in compliance with the below, outside the European Union as follows:

- Other Companies in the Nevision Group which need access to your personal data in order to manage services and activities coordinated at the group level;
- Professional Advisors: Accountants, auditors, lawyers, insurers, bankers, and other professional advisors in all of the countries in which we operate;
- Service Providers and Clients: Companies that provide products and services to the Company such as payroll, pension scheme, benefits, human resources, performance management, training, expense management, IT systems supply and support, assistance with equity compensation programmes, credit cards, medical or health services, trade

bodies and associations services, travel services and others. Companies which we provide products or services to such as broadcasters;

- Public, Judicial, Governmental Authorities and Litigants: Entities that regulate or have jurisdiction over our Companies such as regulatory authorities, law enforcement, public bodies and judicial bodies or other third parties in connection with judicial or regulatory proceedings for example for the purpose of prevention of fraud or other crime;
- Customers: We may need to share your data for certain purposes with customers for example broadcasters or distributors who may be transmitting or exploiting our shows. This may be necessary for them to undertake appropriate reviews, research and compliance checks, broadcasting the programme and commercially exploiting the programme. Broadcasters or other platforms transmitting our Content will need your information to be included as part of their Programme As Completed paperwork which is a breakdown of the underlying rights in the Programme or Content. Should you wish to know more about The Broadcasters and distributors will have their own Data Protection Notices which we can provide upon request;
- Where public interest or of newsworthiness of information may mean that we determine it necessary to pass it on to another media organisation.

Why It Is Necessary To Collect Your Data?

It is necessary for us to process your information for the following reasons:

- As Programme makers, we process data for the purpose of programme production, broadcasting, streaming, distribution but also publicity, marketing and promotion.
- If we are developing or producing a film which is the subject of a story which is journalism or other public interest programming, it will be necessary for us to obtain information about you. If contributing on-screen this will include the recording of your image and voice and opinions.
- We may need to process your information in order to verify your identity and consider your contribution to our project, be it as an on or off-screen contributor be it an interviewee, actor, narrator, freelancer or member of the crew.
- Contractual necessity: It may be necessary for us to process your information for the performance of a contract to which you may be party, or before a contract is entered into, in anticipation of a contractual relationship between us, to exercise our obligations and rights for employment, social security, social protection law or a collective agreement.

- We will need to process your bank details and retain these details in order to pay you any sums owed and also to comply with HMRC rules. The same details may need to be retained for the payment of any residuals or royalties.
- In order to ensure your inclusion as a named insured party on our production insurance policy.
- As a member of our crew, we will need to include your personal information including telephone number and email address on the production call sheet which will be provided to all crew electronically prior to arrival on location. This is so that all crew are contactable on location should there be any last minute amendments to the schedule.
- We may need to disclose personal information for reasons of Health and Safety for example food allergies if working on a cookery show.
- Legal Claims: your data may be used to exercise or defend legal claims or when courts are acting in their judicial capacity.
- Medical diagnosis or treatment: for preventative or occupational medicine, for the assessment of your capacity to be interviewed or to contribute to a project for health and safety reasons.
- to retain the programme and images and your personal data in it in our archive, for the purposing of monitoring or repeating the programme or otherwise using it for commercial purposes, our journalism or archiving in the public interest.
- to commercially make full use of either the entire programme or clips from it in the UK and around the world, for the period in which we have rights in the programme. We also keep an archive copy of the programme after our rights have expired - as a record of programming we have either made and/or broadcast/ streamed;
- to pass on to a competent regulator, prosecutor or competent authority or law enforcement authorities including without limitation the UK Information Commissioner and/or the Office for Communications (OFCOM) should it be requested from us;
- to comply with our accounting, tax reporting and audit requirements;
- to comply with our insurance obligations;
- to protect our business against fraud, breach of confidence, theft of proprietary materials, and other financial or business crimes (to the extent that this is not required of us by law);
- to monitor communications to/from us using our systems;

- to protect the security and integrity of our IT systems; and
- **Future participation:** Where you have agreed to us storing your contact details in order that we can contact you about your participation in future programmes, we process your personal data in connection with your consideration for future programmes and/or other programmes or other material or content produced by us or by another company within the Company.

How is the data stored and For How Long:

The information can be in hard copy form e.g. original or copy paper document, photographs and film; or in electronic form e.g. held on a PC, laptop, mobile phone, tablet, memory stick, drive or server. Documents stored in electronic format will be stored securely and password protected. Paper copies will be locked in a secure location.

In general we keep your information only for the period we have legal rights to exploit the Content that your information relates to, but we have included some exceptions to that rule above. We keep your personal data for as long as it is required by us for our legitimate business purposes, to perform our contractual obligations, or where longer, such longer period as is permitted or required by law or regulatory obligations which apply to us.

In any case, we will take steps to ensure that the personal data processed is relevant and not excessive for its intended use and is accurate and complete for carrying out the purposes described in this Privacy Notice.

Do you need my consent to include me or my information in a programme?

There are circumstances in which we can make programmes about an individual without their consent provided we comply with the relevant laws and regulatory codes, such as the Ofcom Broadcasting Code or similar in Spain and Scandanavia.

We do not generally rely on obtaining your consent to process your personal data to make a programme in which you appear. This is something which we do as part of our legitimate business interests, for contract purposes and in some instances on the basis of public interest as explained above.

Where you have entered into a contract with us to participate in our programmes, we may be entitled to show the programme whether or not you later change your mind about participation.

Transferring Information Abroad

Our films are distributed internationally and this may require us to transfer your personal data to other countries (including countries other than where you are based that have a different data

protection regime than the one existing in the country where you are based). If you are in the European Economic Area (EEA), this may include countries outside of the EEA.

The Nevision Group has Companies internationally and as such it may disclose your personal data to its personnel and to some third parties providing services to fulfil the purposes described in this Privacy Notice.

Your Rights:

You have the right to:

- Obtain confirmation as to whether or not your personal data exists and to be informed of its content and source, verify its accuracy and request its rectification, update or amendment.
- Request the deletion, anonymisation or restriction of the processing of your personal data processed in breach of the applicable law.
- Object to or request the limiting of the processing, in all cases, of your personal data for legitimate reasons.
- Receive an electronic copy of your personal data, if you would like to port the personal data, which you have provided to us, to yourself or to a different provider (data portability), when the personal data is processed by automatic means and the processing is either (i) based upon your consent or (ii) necessary for the provision of the company service; and
- Lodge a complaint with the relevant data protection regulatory authority.

You may send your request to z.loizou@nevision.com.

Please note, however, that certain personal data may be exempt from such access, correction and deletion requests pursuant to applicable data protection laws or other laws and regulations.

Your Obligations:

Please keep personal data up to date and inform us of any significant changes to personal data. You agree to inform your dependents, whose personal data you provide to the Company, about the content of this Privacy Notice, and to obtain their consent (provided they are legally competent to give consent) for the processing of that personal data by the Company as set out in this Privacy Notice.