



This Notice applies to Lightbox and its subsidiaries

Contributor Privacy Notice

1. Scope

Lightbox is required by UK General Data Protection Regulations to inform you of how we “process” any personal data we may collect about you when engaging you to take part in one of our programmes. “Processing” simply means doing anything with the data – collecting it, storing it, disclosing it or deleting it.

This document sets out what we do with your data and the steps we take to ensure we keep that data safe.

Personal information (information about you from which you can be identified) may include your name, address, telephone number, your image captured on video etc

2. Personal Data - what we hold and why we process it

We process data for the purposes of our business including for development and production of programmes, broadcasting, distribution and marketing of those programmes.

The Supplementary Information provides more specific information on these purposes, on the type of data that may be processed and on the grounds on which we process data.

3. Where the data comes from and who gets to see it

Some of the personal data that we process about you comes from you. For example, your name, age and email address, mobile number. Other personal data about you is generated in the course of you taking part in the production.

If you are under 18 years of age we will need your parent/guardian’s permission before you provide us with any personal information.

Your personal data may be seen internally by relevant people working on the production. We may also pass your data outside the organisation, for example for distribution and marketing purposes and also to relevant bodies such as the Commissioning broadcaster.

4. How long do we keep Personal Data

We do not keep your personal data for any specific period but will not keep it for longer than is necessary for our purposes.

In general, if you take part in a production we will keep your personal data for so long as you take part in a production and for a period afterwards. If you are not chosen to take part in the programme we will retain your personal data for as short a period of time as is reasonable after our discussions have ended.

5. Transfers of Personal Data outside the European Economic Area (EEA)

We may transfer your personal data outside the EEA to perform our business.

6. Your data rights

You have a right to make a subject access request to receive a copy of the data that we process about you. Further information on this and your other rights is in the Supplementary Information.

7. Contact details

In processing your personal data, we act as a data controller. Our contact details for data protection issues are as follows: Vanessa Tovell, Chief Operating Officer, e-mail info@lightboxent.com, Lightbox, 10 Amwell Street, London, EC1R 1UQ.

8. Status of this notice

This notice does not form part of your contract and does not create contractual rights or obligations. This Policy was last updated on 25th May 2018. It should be regarded as a living document that may be amended by us at any time, to ensure our ongoing compliance with The General Data Protection Regulations and the UK's Data Protection Act 2018.

Contributor Privacy Notice - Supplementary Information

1. What is “Personal Data”

“**Personal data**” is information relating to you (or from which you may be identified) which is processed by automatic means or which is (or is intended to be) part of a structured manual filing system. It includes not only facts about you, but also intentions and opinions about you.

Data “**processed automatically**” includes information held on, or used on, a computer, laptop, mobile phone or similar device. It covers data derived from equipment such as access passes within a building, data on use of vehicles and sound and image data such as CCTV. It also covers video, audio and images captured as part of a production.

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual orientation, sex life, trade union membership and genetic and biometric data are subject to special protection and considered by EU privacy law to be “**special category data**”.

References in this Contributor Privacy Notice to “work” or “services” (and similar expressions) include any arrangement we may have under which an individual provides us services in relation to a production. We use the word “**you**” to refer to anyone within the scope of this notice.

References to “Programmes” or “Productions” includes the development of the programme, the programme itself and/or series you have applied for, or been approached to appear in; and any re-edited, re-voiced, re-formatted, updated or compilation, or any other versions thereof, or further series or spin-off’s and/or other content.

2. Legal grounds for processing Personal Data

Under data protection law, there are various grounds on which we can rely when processing your personal data. In some contexts more than one ground applies. We have summarised these grounds as Legal obligation, Legitimate Interests, To Perform the Contract, and Consent and outline what these terms mean in the following table.

Term	Ground for processing	Explanation
Legal obligation	Processing is necessary to comply with our legal obligations	Ensuring that we perform our legal and regulatory obligations. For example, avoiding unlawful discrimination, ensuring a Safe working environment.
Legitimate Interests	Processing is necessary for our or a third party’s legitimate interests	We or a third party have legitimate interests in carrying on, managing and administering our respective businesses effectively and properly, and in connection with those interests we process your data. Your data will not be processed on this basis if our or a third party’s interests are overridden by your own interests, rights and freedoms.

To Perform the Contract	Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract	To prepare and fulfill the contract between us we process your data.
Consent	You have given specific consent to processing your data	In general, processing of your data in connection with the services you provide is not conditional on your consent, although there may be exceptions to this.

3. Processing Special Category Data

If we process sensitive personal data about you (which includes medical information, political opinions, sexual orientation), as well as ensuring that one of the grounds for processing mentioned above applies, we will make sure that one or more of the grounds for processing sensitive personal/special category data applies. In outline, these include:

- Where you have given explicit consent to the processing of your personal data;
- Processing relating to data about you that you have made public (e.g. if you tell us you are ill);
- Processing being necessary for the purpose of establishing, making or defending legal claims;
- Processing being necessary for provision of health care or treatment, medical diagnosis, and assessment of your working capacity;
- Processing for equality and diversity purposes to the extent permitted by law.

4. Further information on the data we process and purposes

More specific information on the reasons we process your personal data and examples of the data and the grounds on which we process data, are in the table below.

The examples in the table cannot, of course, be exhaustive. For example, we may also require criminal background checks for contributors to certain programmes in development and production. If we require these checks we rely on the legal basis that it is necessary to comply with statutory or regulatory requirements and obligations, and we are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the programme. On occasions we may ask for your explicit Consent to such checks. Where we require criminal background checks the company has in place an appropriate policy document and safeguards, which we are required by law to have.

Where we need to ask you about sensitive information, e.g. your health information, you do not need to provide this information to us. However, if you do not, you may be unable to take part in the programme.

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
Potential Engagement and Actual Engagement	<p>Information concerning your application to take part in our productions and our assessment of it, your references, any checks we may make to verify your identify and information you have provided, or any other background checks. Including any information submitted by an agent on your behalf.</p> <p>This may include information we obtain from others, including publicly available and accessible directories and sources, social media platforms, tax authorities and governmental and regulatory authorities, fraud prevention and detection agencies and organisations.</p> <p>If relevant, depending on the nature of the programme, we may also process information that is special category/sensitive data, for example health information, political opinions, sexual orientation, religious beliefs and where relevant, criminal conviction and offences history (see above).</p> <p>If relevant we may also process information concerning your health and any disability you have in connection with any adjustments that need to be made to filming arrangements.</p>	Legal obligation Legitimate interests
Evaluating your potential role on a production to enable its creation, broadcast, sale and distribution.	Information connected with your potential role including, if you are in consideration for an on-screen or voiceover role, the processing of images/video/audio of you.	Legal obligation Legitimate interests
To Create a Contract with you, and, if appropriate, to pay you	Information that is included in the contract and if appropriate your payment details	To Perform the Contract
Contacting you or others on your behalf	Your address and phone number, emergency contact information and information on your next of kin.	Legitimate interests
Enabling the creation, sale and distribution / broadcast of a production you are taking part in (including online content, publicity and promotional materials)	Information connected with your participation including the processing of images/video/audio of you.	Legal obligation Legitimate interests

Providing details in connection with your seeking to participate on other production	Information on your potentially or actually taking part in one of our other productions.	Consent Legitimate interests
Monitoring of diversity and equal opportunities	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. We are required to share aggregated and anonymised diversity statistics with regulators and commissioners under the 'Diamond' project, the system managed by the Creative Diversity Network, on behalf of the UK Broadcasters BBC, ITV, Channel 4, Sky and Channel 5/Viacom.	Legitimate interests
Disputes and legal proceedings	Any information relevant or potentially relevant to a dispute or legal proceeding affecting us.	Legitimate interests Legal obligation
Day to day business operations including marketing and where you travel on our behalf	Information relating to your participation in a programme. This may include a picture or profile of you. Information regarding your travel arrangements and location.	Legitimate interests
Maintaining appropriate business records during and after your participation in a programme	Information relating to your participation in one of our productions.	Legal obligation Legitimate interests

Please note that owing to the fact that you may be appearing in one of our programmes, on some occasions we or third parties will rely upon 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 General Data Protection Regulation and in the UK's Data Protection Bill section on the exemption for '*journalistic, academic, artistic or literary purposes*').

5. Where data comes from?

When you participate in one of our productions the initial data about you that we process is likely to come from you, but we may also require references and information from third parties and carry out background checks.

For example, we will collect data from The Disclosure & Barring Service in respect of criminal convictions and offences, when this is appropriate.

6. Who gets to see your data and where it is held?

Internal use: Your personal data may be disclosed within Lightbox to our employees and staff working on your production.

Data will be stored in a range of different places, including on your application record, in management systems and on other IT systems (including email).

External use: We may disclose your data if it is necessary for our legitimate interests as an organisation, or for the legitimate interests of a third party (but we will not do this if these interests are over-riden by your interests and rights in particular to privacy).

Specific circumstances in which your personal data may be disclosed include:

- Disclosure of aggregated and anonymised diversity data to relevant regulators as part of a formal request;
- If you have an on-screen role, disclosure of footage, images, or audio recordings of you as part of the broadcasting, distribution and marketing of the production. Or, whether you have an on-screen or off-screen role, to allow us to credit your role on the programme and share your data on our website.
- When complying with our obligations under any applicable laws.
- Disclosure to Co-Producers, Business Affairs, Finance, Health and Safety, Distributors, Agents, Commissioning Broadcasters, Investors, Insurers, IT system suppliers, Travel and Medical Service Providers/Practitioners.

Any Companies or Organisations and/or individuals with whom we share your Data will be required to comply with current Data Protection laws. Your Data will not be subject to any automated decision making processes.

7. How do we protect your Data?

The company takes the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our staff and relevant third parties in the proper performance of their duties.

8. Retaining your Personal Data - more information

Although there is no specific period for which we will keep your personal data, we will not keep it for longer than is necessary for our purposes.

Data of unsuccessful Contributors will be retained for as short a period of time as possible, although we will often have an ongoing legitimate interest in retaining your data for an extended period.

Data of successful Contributors who have appeared on a show may be kept indefinitely for as long as the Programme is being broadcast distributed and/or exploited and for as long as we need a record of your participation, as we have an ongoing legitimate business interest in retaining the data.

9. Transfers of Personal Data outside of the EEA - more information

In connection with our business and for production, broadcasting, distribution, administrative, management, marketing and legal purposes, we may transfer your personal data outside the EEA to data processors in the US or to other jurisdictions in which we are established or where we have 3rd party service providers or business relationships. We will ensure that any transfer is lawful and that there are appropriate security arrangements and safeguards to protect your data.

10. Access to your Personal Data and other rights

We try to be as open as we reasonably can about your personal data that we process. If you would like specific information, please ask us.

You have a legal right to make a “subject access request”. If you exercise this right and we hold personal data about you, we are required to provide you with information, within a month, including:

- Giving you a description and copy of the personal data we hold on you
- Telling you why we are processing it.

If you make a subject access request and there is any question about who you are, we may require you to provide information so that we can satisfy ourselves as to your identity.

As well as your subject access rights, you may have a legal right to have your personal data rectified or erased, to object to its processing or to have its processing restricted.

If we have relied on consent as a ground for processing, you may withdraw consent at any time – though if you do so that will not affect the lawfulness of what we have done with your data before you withdraw consent.

11. Complaints

If you have complaints relating to our processing of your personal data, you should raise these with your key contact at the production in the first instance.

You may also raise complaints with your statutory regulator, which in the UK, is the Information Commissions Office.