



## PRIVACY NOTICE FOR CAST CREW AND CONTRIBUTORS

### 1. Introduction

Your information is very important to us and we look after it carefully in line with privacy and data protection laws, including the General Data Protection Regulation and any applicable UK legislation. We've set out below in more detail what information we collect about you, how we use that information and your rights as a data subject.

This Privacy Notice for cast, crew and other contributors and/or rights holders in and to our programmes describes the categories of personal information we may process, how your personal information may be processed and how your privacy is safeguarded in the course of our relationship with you. It is intended to comply with our obligations to provide you with information about the Company's processing of your personal information under privacy laws. It does not form part of the contract between us.

We may update this Privacy Notice from time to time and will notify you when any changes are made. This Privacy Notice was last updated on 25 June 2020.

The Company is committed to protecting the security of the personal information you share with us. To support this, we've taken appropriate technical, physical and organisational measures to make sure the level of security is appropriate to the risk. Our policies covering *Privacy & Data Protection* and our *Code of Conduct* have already been provided to you or are available upon request.

### 2. Who is the Company?

Any reference to "we", "us", "our" and "the Company" is to Mammoth Screen Limited and its subsidiary companies. We're known as the "data controller". You can contact us at [privacy@mammothscreen.com](mailto:privacy@mammothscreen.com) for more information about how we process your data, including how to exercise your rights as a data subject. Mammoth Screen Limited or the relevant subsidiary company of Mammoth Screen Limited identified in the written contract between us will be the data controller of your personal data.

### 3. How does the Company collect data?

The Company collects and records your personal information from a variety of sources, but mainly directly from you. You will usually provide this information directly to the Company or production contact through your application for roles, or during our contracting, onboarding and payment processes or emails and CVs which you send to the Company in the course of your engagement on a production or project.

Following your engagement with the Company you may also elect to send us updated versions of your CV from time to time ("**Updated CVs**").

We may also obtain some information from third parties, for example, tax authorities, benefit providers or where we employ a third party to carry out a background check (where permitted by applicable law) or if securing references as part of the hiring process.

In some circumstances, data may be collected indirectly from monitoring devices or by other means (for example, building and location access control and monitoring systems, Closed Circuit television, telephone logs and recordings and email and Internet access logs), if and to the extent permitted by applicable laws.

In these circumstances, the data may be collected by the Company or a third party provider of the relevant service. This type of data is generally not accessed on a routine basis but access is possible. Access may occur, for instance, in situations where the Company is investigating possible violations of Company policies.

If you do not provide us with certain information it may mean that we cannot carry out certain processes. For example, if you do not provide us with your bank details, we will not be able to pay you. In some cases it may mean that we are unable to continue with your engagement as the Company will not have the personal information we believe to be necessary for the effective and efficient administration and management of our engagement with you.

Apart from personal information about you, you may also provide the Company with personal information of third parties, i.e., for purposes of administration and management including to contact your next-of-kin in an emergency or for health & safety purposes if someone you live with is suffering from Covid-19 or has been advised by their GP or hospital clinician that they are "Clinically Extremely Vulnerable" (i.e. is suffering from an identified medical condition that places them at a high risk from Covid-19). Before you provide any such third party personal information to the Company you must first inform these third parties of any data you intend to provide to the Company and of the processing to be carried out by the Company, as detailed in this Privacy Notice.

#### 4. What information are we processing and why?

Personal information means any information describing or relating to an identifiable individual, such as name, address, age, contract details, health etc.

##### Personal Information

We will collect some or all of the various types of personal information about you for the purposes described in this Privacy Notice including:

- *Crew, cast or contributor related data*: your title, forename, middle name(s) and surname, birth name, preferred name, any additional names, gender, nationality, second nationality, date of birth, age, home contact details (e.g. address, telephone number, e-mail), national insurance, social security or any other national identification number, immigration and eligibility to work data, next-of-kin/dependent contact information;
- *Data related to your engagement with the Company*: work contact details (e.g. address, telephone number, e-mail), work location, default hours, work biography, reporting line, worker type, hire/contract start and end dates, job title and job description, working hours and patterns, termination/contract end date; your last day of work, references, status (active/inactive/terminated); the reason for any change in job and date of change; benefit coverage start date;
- *Recruitment and talent pooling data*: qualifications, references, CV and application, interview and assessment data, vetting and verification information;
- *Regulatory data*: records of your registration with any applicable regulatory authority, your regulated status and any regulatory references;
- *Remuneration and benefits data*: including contract pay as applicable, allowances, auto-enrolment pension schemes, bank account details, job level, social security number, tax information, expenses, participation in benefits provided by third parties;
- *Leave information*: absence records (including dates and categories of leave/time-off), holiday dates;
- *Data relating to Company or Production processes*: health and safety audits, risk assessments, incident reports, data relating to training and development needs or training received, call sheets, contacts lists, organising travel and hotel bookings, insurance cover;
- *Monitoring data (to the extent permitted by applicable laws)*: Closed Circuit television footage, system and building login and access records, data caught by IT security programmes and filters;
- *Claims, complaints and disclosures data* - involvement in incident reporting and disclosures, investigation of complaints by or regarding crew, cast or contributors; and
- *Communications data* - data stored on Company-provided email accounts or Company-provided phone or SIM cards
- *Equality and diversity data* - **where** permitted by law and provided voluntarily, data regarding ethnicity, gender, age, race, nationality, religious belief, community background and sexual orientation.

Certain additional information may be collected where this is necessary and permitted by local applicable laws.

In relation to the processing of any pension data, if applicable please note that the Trustees of the relevant pension scheme will send you a separate privacy notice to cover this.

#### Special categories of Personal Information

To the extent permitted by applicable laws the Company may also collect and process a limited amount of personal information falling into special categories, sometimes called “sensitive personal data”.

This includes information relating to such matters as racial or ethnic origin, religious beliefs, physical or mental health (including details of adjustments or accommodations), certain maternity/adoption information, sexual orientation, criminal records and information regarding criminal offences or proceedings.

The Company may also collect and process certain information relating to your health including: (i) whether you are deemed to be “Clinically Extremely Vulnerable” (i.e. you have been advised by a GP or hospital clinician that you are suffering from an identified medical condition that places you at a high risk from Covid-19); (ii) if you are “Clinically Vulnerable” (i.e. you have one of the health conditions listed by Public Health England which places you at an increased risk from Covid-19); (iii) if you are suffering from any of the recognised medical symptoms of Covid-19; and (iv) your temperature.

## 5. Purposes for Processing Personal Data

In general, the processing of your personal information is necessary to perform the contract between you and the Company and for compliance with legal obligations to which the Company is subject. The processing is also necessary for the purpose of the legitimate interests pursued by the Company, except where such interests are overridden by your interests or fundamental rights and freedoms.

This processing may also enable us to: provide you with various benefits (statutory holiday, auto-enrolment assessment and deductions and, if applicable to your role, statutory sick pay); to manage and administrate your engagement; and to consider you for future engagements within the Company.

[Please click here for the full list of processes](#) that use your personal information, including the purpose and the lawful basis of each process. We may undertake certain other processing of personal information which are subject to additional Privacy Notices and we shall bring these to your attention where they arise.

Some of our processing will involve **special categories of sensitive information**, as described above. This information will only be processed where data protection law allows this using a specific lawful justification, under one of the following bases where the processing is necessary:

- where explicit consent has been given; ● where the processing is necessary;
  - for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law (including such laws which also apply to workers), social security and social protection law, to the extent permissible under applicable laws;
  - for the purposes of preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, to the extent permitted by applicable laws;
  - to protect your vital interests or of another person where you are physically or legally incapable of giving consent (for example in exceptional emergency situations, such as a medical emergency); or
  - for the establishment, exercise or defence of legal claims; or
  - for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained.

[Please click here for some examples of processes using special categories of sensitive information](#)

We may seek your consent to certain processing which is not otherwise justified under one of the above bases. If consent is required for the processing in question, it will be sought from you separately to ensure that it is freely given, informed and explicit. Information regarding such processing will be provided to you at the time that consent is requested, along with the

impact of not providing any such consent. You should be aware that it is not a condition or requirement of your engagement to agree to any request for consent from the Company. Where consent is given, it may be withdrawn by you at any time, but this will not impact on any other lawful basis for processing relied on by the Company;

Personal Information relating to **criminal convictions and offences** will only be processed where authorised by applicable laws, for example:

- a criminal record check may be carried out on recruitment or transfer where authorised by applicable laws; or
- an allegation of a criminal offence or conviction arising during your relationship with the Company may be processed where required or authorised. For example where we have a legal or regulatory requirement to report an offence, or applicable laws authorise the Company to process information about the offence for the purpose of making decisions regarding your relationship with the Company.

## **6. Who has access to my data?**

Your personal information can be accessed by or may be disclosed within the Company on a need-to-know basis to:

- Production teams relating to your current engagement or potential future engagements - restricted to those individuals within the production team who need to know and limited to the specific information they require;
- Legal and Business Affairs team members;
- Those responsible for managing or making decisions in connection with your relationship with the Company or involved in a process concerning your relationship with the Company;
- System administrators and system maintenance - by teams in the Company such as Finance.

Certain basic personal information, such as your name, location, job title and contact information may also be accessible to other colleagues via call sheets and unit lists.

Your personal information will only be shared where necessary with third parties, e.g. providers of payroll, auto-enrolment pension and training services and other third parties such as the Company's insurers and insurance brokers, health & safety consultants, bankers, IT administrators, lawyers, auditors, investors, consultants and other professional advisors. Where these third parties act as a "data processor", they carry out their tasks on our behalf and upon our instructions for the above mentioned purposes. In this case your personal information will only be disclosed to these parties to the extent necessary to provide the required services.

Personal information may also be shared with certain interconnecting systems (such as payroll, pension and benefits systems). Data contained in such systems may be accessible by providers of those systems, their associated companies and sub-contractors. In addition, we may share personal information with national authorities in order to comply with a legal obligation to which we are subject. This is for example the case in the framework of imminent or pending legal proceedings or a statutory audit.

## **7. Where is my data transferred?**

Your personal information is mainly processed within the UK, however from time to time your personal information (including special categories of personal information) will be transferred elsewhere in the world for third parties to process, for the purposes described in this Privacy Notice. In particular, our usual production payroll provider has a head office in Australia and certain data can be accessed by authorised staff in their Australian headquarters. We may also need to transfer your data outside the UK if your production is filming abroad. As a result, your personal information may be transferred to countries whose data protection laws may be less stringent than yours. Where this is the case, the Company will ensure that appropriate or suitable safeguards are in place to protect your personal information and that its transfer is in compliance with applicable data protection laws.

Where required by applicable data protection laws, the Company will ensure that service providers sign standard contractual clauses as approved by the European Commission or other supervisory authority with jurisdiction over the relevant Company exporter. You can request a copy of any standard contractual clauses in place which relate to transfers of your Personal Information by contacting [privacy@mammothscreens.com](mailto:privacy@mammothscreens.com).

## 8. How long does the Company keep my data?

We retain your personal information only so long as it is required for purposes for which it was collected, whilst keeping it as up-to-date as possible and making sure that irrelevant or excessive data is deleted or made anonymous as soon as reasonably practicable.

Each Updated CV which you send us will be retained by us for 4 years and can be accessed by our Production Teams, in considering you for future engagements within the Company. You have a right to ask for your CV to be deleted from our records, and can do so by contacting [privacy@mammothscreens.com](mailto:privacy@mammothscreens.com). We will endeavour always to refer to the most up to date version of your CV when considering you for future engagements.

Our aim is to ensure that data is retained in accordance with the periods set out in the [Retention Schedule](#) and that data is deleted as soon as reasonably practicable thereafter. We are looking to put into place suitable processes and procedures to achieve that aim. Please be aware that not all of the entries on the Retention Schedule may be applicable to you.

In order to perform our contractual obligations and to comply with the applicable laws, we generally retain your information for the duration of your engagement plus a further 6 years. Thereafter we will securely destroy your data, including that held by any third party, unless there is an obligation to retain it further.

We may keep some specific types of data, (for example tax records, pensions data) for different periods of time, as required by applicable law.

### What rights do I have and how can I use them?

In law you are the 'Data Subject' and you have several rights that you can exercise over your data such as the right to access, correct and request to delete your personal information. From 25th May 2018 you have some additional rights e.g. data portability, restricting the processing or objecting to it if was done under legitimate interests.

You also have the right to lodge a complaint with a supervisory authority, in particular in your country of residence (e.g. the Information Commissioner's Office in the UK), if you consider that the processing of your personal information infringes applicable law.

[Please click here for more information on your rights and how to use them](#), or contact [privacy@mammothscreens.com](mailto:privacy@mammothscreens.com).

Any queries relating to GDPR should be directed to [privacy@mammothscreens.com](mailto:privacy@mammothscreens.com).

Mammoth Screen Limited is a registered with Information Commissioner's Office (ICO) as data controller (registration number: ZA043892). For more information please visit the ICO's website [www.ico.org.uk](http://www.ico.org.uk)

Other companies in the Mammoth group of companies are registered with ICO where necessary.

## Purpose and lawful basis

Ref	Purpose for processing	Necessary for Performance of Contract	Necessary to comply with a Legal Obligation	Legitimate Interest	What is the Company's Legitimate Interest
a)	Recruitment and selection	Y	Y	Y	The Company considers it has a legitimate interest in fully assessing applications for employment to ensure only suitable and appropriate candidates are both assessed and selected, so that the Company identifies the right people for its business who will be able to contribute to its operations and to the culture.
b)	Appropriate vetting for recruitment and team allocation including, where relevant and appropriate credit checks, right to work verification, identity fraud checks, criminal record checks (if and to the extent permitted by applicable laws), relevant employment history, relevant regulatory status and professional qualifications;		Y	Y	The Company considers it has a legitimate interest in managing its business operations in the most effective way and needs to make decisions relating to the future of its business in order to preserve its business operations or grow its business, including the interests of the workforce as a whole and the Company customer base.
c)	Providing and administering remuneration, benefits, pension and incentive schemes and reimbursement of business costs and expenses and making appropriate tax and social security and other deductions and contributions as required;	Y	Y	Y	The Company considers it has a legitimate interest in managing its workforce and operating its business, including ensuring that employees are properly remunerated and that remuneration is set an appropriate level and in undertaking normal business operations.
d)	Allocating and managing duties and responsibilities and the business activities to which they relate, including business travel;	Y		Y	The Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring each employee undertakes appropriate duties, is properly trained and undertakes their role correctly and in accordance with appropriate procedures and in undertaking normal business operations.
e)	Identifying and communicating effectively with employees;	Y		Y	The Company considers it has a legitimate interest in managing its workforce and operating its business including undertaking normal business operations and maintaining a dialogue with employees.
f)	Managing and operating appraisals, conduct, performance, capability, absence and grievance related reviews, allegations, complaints, investigations and processes and other informal and formal HR processes and making related management decisions;	Y	Y	Y	The Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring each employee undertakes appropriate duties, is properly trained and undertakes their role correctly and in accordance with appropriate procedures. It also includes addressing and resolving employee related concerns and issues and complying with applicable laws and regulations.

Ref	Purpose for processing	Necessary for Performance of Contract	Necessary to comply with a Legal Obligation	Legitimate Interest	What is the Company's Legitimate Interest
g)	Training, development, promotion, career, talent management and succession planning and business contingency planning;	Y	Y	Y	The Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring that each employee undertakes appropriate duties, is properly trained and undertakes their roles correctly and in accordance with appropriate procedures.
h)	Consultations or discussions with representatives of employees;	Y	Y	Y	The Company considers it has a legitimate interest in managing its workforce and operating its business including undertaking normal business operations and maintaining a dialogue with employees and complying with applicable laws and regulations.
i)	Conducting statutory reporting and surveys for benchmarking, identifying improved ways of working, employee relations and engagement at work (these will often be anonymous but may include profiling data such as age and gender to support analysis of results);		Y	Y	The Company considers it has a legitimate interest in managing its workforce and operating its business. This includes ensuring that each employee undertakes appropriate duties, is properly trained and undertakes their roles correctly and in accordance with appropriate procedures, undertaking normal business operations and maintaining a dialogue with employees, ensuring that employees are properly remunerated and that this remuneration is set an appropriate level and complying with applicable laws and regulations. The Company has a legitimate interest in seeking the views of its workforce and giving them the opportunity to raise concerns or suggest improvements. Effective employee engagement helps ensure the Company makes the best decisions for the business and is important to attract and retain high calibre employees. This will support the Company to achieve its immediate and long-term business goals and outcomes.

Ref	Purpose for processing	Necessary for Performance of Contract	Necessary to comply with a Legal Obligation	Legitimate Interest	What is the Company's Legitimate Interest
j)	Processing information about absence or medical information regarding physical or mental health or condition in order to: assess eligibility for remuneration and benefits related to health, sickness absence and long-term incapacity; determine fitness for work; facilitate a return to work; make adjustments or accommodations to duties or the workplace; make management decisions regarding employment or engagement or continued employment or engagement or redeployment; and conduct related management processes;	Y	Y	Y	<p>The Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring each employee undertakes appropriate duties, is properly trained and undertakes their roles correctly and in accordance with appropriate procedures and managing employee absence and leave entitlements.</p> <p>The Company considers that it has a legitimate interest in managing health and safety risk and operating its business. This includes supporting the welfare of employees and taking steps to identify and mitigate risks to employees' health, safety or welfare, ensure fitness for work and to manage absence and incapacity impacting on the ability of employees to perform their roles.</p> <p>Effective support and management of employees supports business performance and the attraction and retention of high calibre employees. This supports the Company's immediate and long-term business goals and outcomes.</p>
k)	For planning, managing and carrying out restructuring or redundancies or other change programmes including appropriate consultation, selection, alternative employment searches and related management decisions;		Y	Y	<p>The Company considers it has a legitimate interest in managing its business operations in the most effective way. The Company needs to make decisions relating to the future of its business in order to preserve its business operations or grow its business. These interests include the interests of the workforce as a whole and the Company customer base.</p>
l)	Complying with reference requests where the Company is named by the individual as a referee;			Y	<p>The Company considers it is in the legitimate interests of a new employer to receive confirmation of employment details from the Company for the purposes of confirming the former employee's employment history.</p>



Ref	Purpose for processing	Necessary for Performance of Contract	Necessary to comply with a Legal Obligation	Legitimate Interest	What is the Company's Legitimate Interest
m)	Operating email, IT, internet, social media, HR related and other company policies and procedures. To the extent permitted by applicable laws, the Company carries out monitoring of the Company's IT systems to protect and maintain the integrity of the Company's IT systems and infrastructure; to ensure compliance with the Company's IT policies and to locate information through searches where needed for a legitimate business purpose;	Y	Y	Y	The Company considers it has a legitimate interest in managing its workforce and operating its business. The IT function is essential to ensuring that this can be carried out in the most effective way. This includes maintaining the integrity and security of data and facilitating records management.
n)	Satisfying its regulatory obligations to supervise the persons employed or appointed by it to conduct business on its behalf, including preventing, detecting and investigating a wide range of activities and behaviours, whether relating to specific business dealings or to the workplace generally and liaising with regulatory authorities;		Y	Y	The Company considers it has a legitimate interest in ensuring that its business, clients, employees and systems are protected including detecting and preventing crimes or criminal activity; ensuring only appropriate employees are engaged in our business; and ensuring compliance with export control and other legal requirements placed upon us (both by EU and non-EU laws).
o)	Protecting the private, confidential and proprietary information of the Company, its employees, its clients and third parties;		Y	Y	The Company considers it has a legitimate interest in ensuring that its business, clients, employees and systems are protected including protecting our assets and the integrity of our systems, detecting and preventing loss of our confidential information and proprietary information.
			Y	Y	

Ref	Purpose for processing	Necessary for Performance of Contract	Necessary to comply with a Legal Obligation	Legitimate Interest	What is the Company's Legitimate Interest
p)	Complying with applicable laws and regulation (for example maternity or parental leave legislation, working time and health and safety legislation, taxation rules, worker consultation requirements, other employment laws and regulation to which the Company is subject in the conduct of its business);				The Company considers that it has a legitimate interest in managing its workforce and operating its business. This includes ensuring that each employee undertakes appropriate duties, is properly trained and undertakes their roles correctly and in accordance with appropriate procedures. It is also necessary to undertake normal business operations and maintain a dialogue with employees and comply with applicable laws and regulations.
q)	Monitoring programmes to ensure equality of opportunity and diversity with regard to personal characteristics protected under applicable anti-discrimination laws;		Y	Y	The Company considers it has legitimate interests in ensuring that it takes action to prevent discrimination and promote an inclusive and diverse workplace.
r)	Planning, due diligence and implementation in relation to a commercial transaction or service transfer involving the Company that impacts on your relationship with the Company for example mergers and acquisitions or a transfer of your employment under applicable automatic transfer rules;		Y	Y	<p>The Company considers it has a legitimate interest in managing its business operations in the most effective way. The Company needs to make decisions relating to the future of its business in order to preserve its business operations or grow its business. These interests include the interests of the workforce as a whole and the Company customer base.</p> <p>In the event that the Company makes a decision to outsource a function or acquire or transfer a business or part of a business the Company and the third party with whom the Company is seeking to transact each have a legitimate interest in ensuring that the workforce, employee costs and liabilities are sufficiently understood prior to committing to the transaction and to ensure a smooth transition of employees if a transaction goes ahead.</p> <p>Business change programmes and transformation support business continuity and improvement and support the Company in achieving its long-term business goals and outcomes.</p>

Ref	Purpose for processing	Necessary for Performance of Contract	Necessary to comply with a Legal Obligation	Legitimate Interest	What is the Company's Legitimate Interest
s)	For business operational and reporting documentation such as management and headcount reporting, the preparation of annual reports or tenders for work or client team records including the use of photographic images;	Y		Y	The Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring each employee undertakes appropriate duties and undertaking normal business operations.
t)	To operate the relationship with third party customer and suppliers including the disclosure of relevant vetting information in line with the appropriate requirements of customers to those customers, contact or professional CV details or photographic images for identification to clients or disclosure of information to data processors for the provision of services to the Company;	Y		Y	<p>The Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring each employee undertakes appropriate duties and undertaking normal business operations.</p> <p>This includes the sharing of appropriate information with existing and prospective customers and suppliers about who is or will be working with them in order to develop strong relationships and support the effective performance of commitments with customers and suppliers.</p> <p>In some cases this may also include supporting customers and suppliers to comply with their legal or regulatory obligations or security requirements by having sufficient information about those providing services to them.</p> <p>The Company also has a legitimate interest in ensuring that it can engage with customers and suppliers effectively and that they can access the information they need to provide the service for which they have been engaged.</p>

Ref	Purpose for processing	Necessary for Performance of Contract	Necessary to comply with a Legal Obligation	Legitimate Interest	What is the Company's Legitimate Interest
u)	Where relevant for publishing appropriate internal or external communications or publicity material (including photographic images) via the Company website, social media and other publicity and communication channels in appropriate circumstances;	Y		Y	<p>The Company has a legitimate interest in communicating effectively with its workforce, customers, its audience and other stakeholders as well as carrying out appropriate business development activity.</p> <p>That includes giving information to the workforce or, where appropriate customers, our audience, other stakeholders or the wider market about relevant business activities, plans or projects. That can include making reference to those of our employees who are involved in the relevant matters being communicated above.</p> <p>Effective employee, and other stakeholder communication and engagement contributes to attraction and retention of high calibre employees, development and retention of customer relationships, audience engagement and participation, strong business performance, business growth and maintaining and enhancing the Company's reputation. This supports the Company's immediate and long-term business goals and outcomes.</p>

v)	To support HR administration and management and maintaining and processing general records necessary to manage the employment, worker or other relationship and operate the contract of employment or engagement;	Y	Y	Y	<p>The Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring that each employee undertakes appropriate duties, is properly trained and undertakes their roles correctly and in accordance with appropriate procedures; managing employee absence and leave entitlements; undertaking normal business operations; maintaining a dialogue with employees; and complying with applicable laws and regulations.</p>
w)	To change access permissions;	Y	Y	Y	<p>The Company considers it has a legitimate interest in managing its workforce and operating its business. The IT function is essential to ensuring this can be carried out in the most effective way including complying with the Company policies and access controls.</p>

Ref	Purpose for processing	Necessary for Performance of Contract	Necessary to comply with a Legal Obligation	Legitimate Interest	What is the Company's Legitimate Interest
x)	To provide technical support and maintenance for HR information systems;	Y	Y	Y	The Company considers it has a legitimate interest in managing its workforce and operating its business. The IT function is essential to ensuring that this can be carried out in the most effective way including maintaining the integrity and security of data and facilitating records management.
y)	To enforce our legal rights and obligations, and for any purposes in connection with any legal claims made by, against or otherwise involving you;	Y	Y	Y	The Company considers it has a legitimate interest in protecting its organisation from breaches of legal obligations owed to it and to defend itself from litigation. This is needed to ensure that the company's legal rights and interests are managed appropriately.
z)	To comply with lawful requests by public authorities (including without limitation to meet national security or law enforcement requirements), discovery requests, or where otherwise required or permitted by applicable laws, court orders, government regulations, or regulatory authorities (including without limitation data protection, tax and employment), whether within or outside your country;	Y	Y	Y	The Company considers it has a legitimate interest in ensuring that it complies with all legal requirements placed on it, whether those are EU or non-EU obligations. The Company wishes to maintain its reputation as a good corporate citizen and to act appropriately in all the countries in which it does business. This includes cooperating with authorities and government bodies. Indeed, the Company is required to comply with laws and regulations in those countries in which it does business and to require otherwise would lead to conflicts of laws issues.

Ref	Purpose for processing	Necessary for Performance of Contract	Necessary to comply with a Legal Obligation	Legitimate Interest	What is the Company's Legitimate Interest
aa)	Production and exploitation of audiovisual programming for commercial purposes, including retaining the programme and your personal data in it in our archive, for the purpose of repeating the programme or otherwise using it for commercial purposes			Y	The Company has a legitimate interest in producing audio visual programming for commercial exploitation, as such "off-screen" contributions from individuals are crucial to this production activity and require the processing of personal information about these individuals.
bb)	Other purposes permitted by applicable laws, including legitimate interests pursued by the Company where these are not overridden by the interests or fundamental rights and freedoms of employees.				

## Special category data

Ref	Purpose for processing	Lawful basis
a)	Assess and review eligibility to work for the Company in the UK.	This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws. In particular the requirement to check that you are legally permitted to work in the UK.
b)	The collection of statistical data subject to local laws, or where required to record such characteristics to comply with equality and diversity requirements of applicable local legislation or to keep the Company's commitment to equal opportunity under review.	This processing is necessary for (i) the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws and (ii) the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained.
c)	Compliance with employment, health and safety or social security laws. For example, to provide statutory incapacity or maternity benefits, avoid breaching legal duties to you, to ensure fair and lawful management of your employment, avoid unlawful termination of your employment, to administer the Company's benefits and remuneration related to health, sickness absence and long-term incapacity, to make reasonable accommodations or adjustments and avoid unlawful discrimination or dealing with complaints arising in this regard.	<p>This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws.</p> <p>To the extent that this data is managed by our occupational health advisers or third-party benefit providers, this processing is necessary for the purposes of preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, to the extent permitted by applicable laws.</p>
d)	Management and investigation of any complaint under the Company's internal policies, including its disciplinary, grievance, bullying and harassment/dignity at work and whistle-blowing policies (or other relevant policies), where such characteristics or information are relevant to the particular complaint, in order to comply with employment law obligations.	<p>This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws.</p> <p>In particular employment laws relating to the effective management of complaints and avoiding unlawful dismissals, antidiscrimination laws and our duty of care to employees.</p>
e)	Management of filming in a post-Covid 19 environment to minimise the risk of exposure to Covid-19 on set by monitoring the temperatures of cast and crew and collecting self-declaration health forms from each cast and crew member where such health declaration form lists the current list of symptoms of coronavirus and confirmation if the individual has been advised if they are "Clinically Extremely Vulnerable" or "Clinically Vulnerable".	This processing is accordance with the Company's health and safety obligations as an employer which are set out in the Health & Safety at Work Act 1974 and the processing is necessary to manage the risk of harm posed by coronavirus to people working on the production and the people they live with.

## Data retention schedule

Category	Record Type	Retention Period
Recruitment information	Job applications, CVs, test results and interview records of successful candidates	Six months following communication of decision
Recruitment information	Speculative cvs and subsequent updated versions for talent pools or potential future assignments or roles	Four years from the date of being received
Recruitment information	Background/DBS checks - criminal offences, proceedings and sentences where this is legally required/permitted or where the employee has consented (e.g. to protect the safety and security of staff and customers, or for insurance purposes)	Six months from the date of recruitment
Recruitment information	Immigration checks (documentation required for immigration purposes - e.g. to evidence citizenship, details of residency, work permit)	Two years after the termination of engagement
Personal information	Title, forename, middle name(s) and surname, birth name, preferred name, any additional names, gender, date of birth, home contact details (eg address, telephone number, e-mail), national ID number	Whilst engagement continues and for up to six years after engagement ceases (or twelve years if you are contracted under a deed). For the purpose of credits, name and role may be retained for the duration of the exploitation of the programme.
Personal information	Nationality, second nationality, civil/marital status, next-of-kin/dependent/emergency contact information	Whilst engagement continues and for up to six months after engagement ceases
Basic work details	Work contact details (eg corporate address, telephone number, e mail)	Whilst engagement continues and for up to six months after engagement ceases
Terms & conditions of engagement	Contracts	Whilst engagement continues, and for up to six years after engagement ceases (or twelve years if you are contracted under a deed)
Terms & conditions of engagement	Collective workforce agreements (including past agreements that could affect present employees)	Permanently - so long as the agreements may affect present contractors
HR & Training Records	HR records (generally)	Whilst engagement continues, and for up to six years after engagement ceases (or twelve years if you are contracted under a deed)
HR & Training Records	Freelancer disciplinary/ grievance records	
HR & Training Records	Qualifications [and regulatory records]	
HR & Training Records	General freelancer training records (unless specific legislation applies to training records for a given role)	



HR & Training Records	Investigation records, including whistleblower reports	
HR & Training Records	Records of termination, retirement or resignation	
HR & Training Records	Records of absence (not sickness or	

HR & Training Records	maternity/paternity/adoption related) Records of absence (sickness related)	Whilst engagement continues, and for up to six years after engagement ceases (or twelve years if you are contracted under a deed)
HR & Training Records	Medical information, including allergies, disabilities, dietary requirements, GP contact details (where required legally or where consent given, e.g. to allow statutory time off for sickness, or to enable appropriate pay/employment adjustments to be made).	Whilst engagement continues, and for up to six years after engagement ceases (or twelve years if you are contracted under a deed)
HR & Training Records	Annual leave records	Six years (or twelve years if you are contracted under a deed)
HR & Training Records	Other leave records	Whilst engagement continues, and for up to six years after engagement ceases (or twelve years if you are contracted under a deed)



Working Time Regulations	Working Time Opt-out forms (where relevant)	Two years from the date on which they were entered into
Working Time Regulations	Records to show compliance with WTR (e.g. time sheets for opted-out workers, health assessment records for night workers)	Two years after the relevant period



Payroll and Fees	PAYE records required by HMRC, NI numbers	Whilst engagement continues, and for up to six years (or twelve years if you are contracted under a deed) plus current year after engagement ceases
Payroll and Fees	Miscellaneous Payments and Deductions eg Bonus schedules, Overtime downloads, Contract pay, VAT payments, Salary increases, SAYE listings, Voluntary deductions. Including working hours details	For up to two years following Financial Year end for Audit purposes
Payroll and Fees	Bank details	Whilst engagement continues, and for up to six months after engagement ceases



Contingent payments	Records of contingent payments due (eg royalties, repeat fees, share of profits) and related terms and conditions	For the duration of our rights in the relevant programme
Contingent payments	Schedule of residuals	For the duration of our rights in the relevant programme
Contingent payments	Payment and bank details	For the duration of our rights in the relevant programme
Contingent payments	Records required for complying with accounting, tax or auditing requirements	For the duration of our rights in the relevant programme, plus six years (or twelve years if you are contracted under a deed)

Finance and Accounting	Bank instruction and Payment files	Whilst engagement continues, and for up to six years (or twelve years if you are contracted under a deed) plus current year after ceases
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Benefits in Kind	PAYE records by HMRC, including NI numbers eg car, fuel, medical cost data for P11d reporting	Whilst engagement continues, and for up to six years (or twelve years if you are contracted under a deed) plus current year after employment ceases
Expenses	Business expenses posted via corporate credit, claimed via expenditure on personal credit card or cash basis	Whilst engagement continues, and for up to six years (or twelve years if you are contracted under a deed) plus current year after employment ceases

Family policy records	Dates of Maternity/paternity/adoption leave, Maternity certificates showing expected due date (MATB1)	Whilst engagement continues, and for up to six years after engagement ceases (or twelve years if you are contracted under a deed)
Family policy records	Details of Maternity/paternity/adoption payments, or of period without maternity payment	Whilst engagement continues, and for up to six years after engagement ceases (or twelve years if you are contracted under a deed)

Monitoring	CCTV footage	One month
Monitoring	IT system log data / web log data / other electronic identification data (including device data)	No longer than necessary

Legal	Details of any claims by cast, crew or contributors against the company	Six years from termination of engagement (or twelve years if you are contracted under a deed)
Legal	Details of any claims by cast, crew or contributors against company insurance	Six years from termination of engagement (or twelve years if you are contracted under a deed)

Legal	Details of any claims involving cast, crew or contributors	Six years from termination of engagement (or twelve years if you are contracted under a deed)
Special categories of data	Racial or ethnic information (e.g. for equal opportunities purposes/with consent)	Whilst engagement continues and for up to six months after engagement ceases
Special categories of data	Sexual orientation (e.g. for equal opportunities purposes/with consent)	Whilst engagement continues and for up to six months after engagement ceases
Special categories of data	Political affiliations, religion, community background, philosophical or similar beliefs where this is legally required / permitted or where the employee has consented, e.g. to allow statutory time off for religious purposes, or to enable the payment of religion/belief-based taxes in some countries	Whilst engagement continues and for up to six months after engagement ceases
Special categories of data	Consents for processing of sensitive personal information	For so long as the data is processed and for up to six years afterwards (or twelve years if you are contracted under a deed)
Benefits	Record of reward and benefit entitlement, start date and participation	Whilst engagement continues and for up to six years after final payment of benefit (or twelve years if you are contracted under a deed)
Health and Safety	Details of any reportable accident, death or injury in connection with work	At least three years from the date the report was made
COVID-19 Health Data	Temperature, details of Covid-19 medical symptoms and details of 'Clinically Extremely Vulnerable' or 'Clinically Vulnerable' status	Either 2 months following the completion of principal photography of the series, or 6 years from receipt of notice of any potential litigation or insurance claim that might involve your Covid-19 Health Data, subject to that period being shortened if that litigation and/or insurance claim is withdrawn or settled.

## Data subject rights

### What are my data subject rights and how can I use them?

As a data subject you have lots of control over the information that we hold on you. These rights and how to use them are explained below.

#### 1. Access to your data

You can request access to the information we hold on you and we will also tell you:

- why we are processing it;
- who are we sharing it with and if any information is transferred to a country not deemed to have adequate protections in place for personal data;
- how long will we be keeping your data;
- the source of the information, if it was not collected directly from you;
- if we are using your data for automated decision making or profiling.

If you are making a request for a copy of your personal data that we are processing, please be as specific as possible as this will both help us to identify the information more quickly and provide you with a copy without any undue delay.

#### 2. Rectifying inaccuracies

If you feel the information we hold on you is inaccurate or incomplete, you can ask us to correct or update it.

#### 3. Right to be forgotten

You can also request that we erase your information in certain circumstances, although that might not always be possible if doing so means we cannot perform our contract with you, or we have a legal obligation or legitimate interest to keep the data. We will explain the consequences of erasing your data.

#### 4. Restrict the processing

If you feel we are processing your information unlawfully or with inaccurate data, you can ask us to restrict any further processing. Where personal information is subjected to restriction in this way we will only process it with your consent or for the establishment, exercise or defence of legal claims unless we have your consent. Please note that even if the processing is restricted, we will continue to store the data.

#### 5. Object to the processing

If you disagree with any legitimate interest or public interest we have relied upon to process your data, you can object to the processing. We will then stop processing the data unless we can demonstrate a compelling legitimate ground that overrides your rights (e.g. exercising or defend a legal claim).

#### 6. Data Portability

You can request to receive personal data that you have provided to us in a commonly used format and request that we transmit it to another data controller where feasible, or to you directly.

#### 7. Make a complaint

We are committed to safeguarding your data and upholding your rights, but if you feel we have not done that, please contact us at [privacy@mammothscreen.com](mailto:privacy@mammothscreen.com) or write to Mammoth Screen, Third Floor, 142-144 New Cavendish Street, London W1W 6YF. Additionally you have the right to complain to the relevant supervisory authority, which in the UK is the Information Commissioner's Office (ICO).

Please contact [privacy@mammothscreen.com](mailto:privacy@mammothscreen.com) or write to Mammoth Screen, Third Floor, 142-144 New Cavendish Street, London W1W 6YF if you want to exercise any of your rights above or want your rights further explained.