



## WORKPLACE PRIVACY NOTICE FOR HONEY BEE MEDIA

### SCOPE OF PRIVACY NOTICE

1. Like most businesses, we hold and process a wide range of information, some of which relates to individuals who work for us. This privacy notice explains the type of information we process, why we are processing it and how that processing may affect you.

The notice focuses on individuals who work for us, whether employed by us or not. It also focuses on individuals who we contract to work on our or third parties' productions. This includes those in production roles, such as designers, production assistants, camera crew etc. and those working on-screen, be it as extras or featured performers, as well as our voiceover artists. In addition, it also covers information on former employees/workers and those who we have previously contracted to work on our or third parties' productions. For the avoidance of doubt however, nothing in this notice is intended to create an employment relationship between Honey Bee Media and any non-employee.

This privacy notice is set out in this document (the Core Notice) and Annex 1- Supplementary Information. Please note also that Honey Bee Media will also comply with all applicable local laws (including but not limited to any GDPR implementing legislation which has yet to be created) in relation to processing your personal data and if anything in this privacy notice conflicts with such local laws, those local laws will take precedence.

In the Supplementary Information, we explain what we mean by "personal data", "processing", "sensitive personal data" and other terms used in the notice.

2. In brief, this notice explains:
  - what personal data we hold and why we process it;
  - the legal grounds which allow us to process your personal data;
  - where the data comes from, who gets to see it and how long we keep it;
  - how to access your personal data and other rights;
  - how to contact us.

### PERSONAL DATA – WHAT WE HOLD AND WHY WE PROCESS IT

3. We process data for the purposes of our business including management, administrative, employment and legal purposes. We also process data for the purposes of our business including for our or third parties' production, broadcasting, distribution, marketing, management, administrative, employment and legal purposes. 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. See *Legal grounds for processing personal data* and *Further information on the data we process and our purposes*.

### WHERE THE DATA COMES FROM AND WHO GETS TO SEE IT

4. Some of the personal data that we process about you comes from you. For example, you tell us your contact and banking details.

Other personal data about you is generated in the course of your work, for example, from your managers, colleagues, contributors or others outside our organisation with whom you deal.



Your personal data will be seen internally by managers and in some circumstances, colleagues. We will, where necessary and as set out in this privacy notice, also pass your data outside the organisation. For example, we may pass your data to people you are dealing with and payroll agencies.

Further information on this is provided in the Supplementary Information. See *Where the data comes from* and *Who gets to see your data?*

#### **HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

5. 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, we will keep your personal data for the duration of your employment and for a period afterwards.

See *Retaining your personal data – more information* in the Supplementary Information.

#### **TRANSFERS OF PERSONAL DATA OUTSIDE THE EEA**

6. Due to the international nature of Honey Bee Media business, we will where necessary and as set out in this privacy notice transfer your personal data outside the EEA. If you are featured in a production, the data constituting your performance may be transferred out of the EEA for distribution and marketing purposes.

#### **YOUR DATA RIGHTS**

7. You have a right to make a subject access request to receive information about the data that we process about you. As well as your subject access right, 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 and to be given the data in machine readable format for transmitting to another data controller. Further information on this and on other rights is in the Supplementary Information under *Access to your personal data and other rights*. We also explain how to make a complaint about our processing of your data.

#### **CONTACT DETAILS**

8. In processing your personal data, we act as a data controller. Our contact details are set out on page 12.

Please note that generally the data controller of your personal data will be your employing/engaging entity but also entities within Honey Bee Media with which we share data for business administration purposes.

#### **STATUS OF THIS NOTICE**

This notice does not form part of your contract of employment and does not create contractual rights or obligations. It may be amended by us at any time and if so we will issue a revised notice and/or take other steps to notify you of the changes in accordance with applicable laws. Nothing in this notice is intended to create an employment relationship between Honey Bee Media and any non-employee. Annex 1- Supplementary information

#### **WHAT DO WE MEAN BY “PERSONAL DATA” AND “PROCESSING”?**

1. “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 such as your name, identification number, location data, online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity, but also, intentions and opinions about you. Personal data can be online and on hard copy documents and in media as mentioned below.

Data “processed automatically” includes information held on, or relating to use of, a computer, laptop, mobile phone or similar device. It covers data derived from equipment such as access passes within a building, data on use



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of vehicles and sound and image data such as CCTV, video, audio and images captured as part of a production or photographs.

"Processing" means doing anything with the data. For example, it includes collecting it, holding it, disclosing it and deleting it.

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 "sensitive personal data".

References in the privacy notice to employment, work (and similar expressions) include any arrangement we may have under which an individual provides us with work. By way of example, when we mention an "employment contract", that includes a contract under which you provide us with services; when we refer to ending your employment, that includes terminating a contract for services. We use the word "you" to refer to anyone within the scope of the notice.

#### LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

##### WHAT ARE THE GROUNDS FOR PROCESSING?

2. Under applicable 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 Contract, Legal obligation, Legitimate Interests and Consent and outline what those terms mean in the following table.

<i>Term</i>	<i>Ground for processing</i>	<i>Explanation</i>
Contract	Processing necessary for performance of a contract with you or to take steps at your request to enter a contract	This covers carrying out our contractual duties and exercising our contractual rights.
Legal obligation	Processing necessary to comply with our legal obligations	Ensuring we perform our legal and regulatory obligations. For example, providing a safe place of work and avoiding unlawful discrimination.
Legitimate Interests	Processing necessary for our or a third party's legitimate interest	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 processing 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.
Consent	You have given specific consent to processing your data	In general, processing of your data in connection with employment is not conditional on your consent. But there may be occasions where we do specific things such as getting a criminal record check for a role which is regulated and rely on your consent to our doing so.



**PROCESSING SENSITIVE PERSONAL DATA**

3. If we process sensitive personal data about you (for example, storing your health records to assist us in ensuring that we provide you with a healthy and safe workplace or processing personal data relating to diversity monitoring), we will ensure that one of the grounds for processing mentioned above applies, and we will also make sure that one or more of the grounds for processing sensitive personal data applies. In outline, these include:
- Processing being necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement;
  - Processing relating to data about you that you have made public (e.g. if you tell colleagues that 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; and
  - Processing based on us having received your explicit consent (although please note as set out above that, in general, processing of your data in connection with employment is not conditional on your consent).

**FURTHER INFORMATION ON THE DATA WE PROCESS AND OUR PURPOSES**

4. The Core Notice outlines the purposes for which we process your personal data. More specific information on these, 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, although the table does not mention data relating to criminal offences, if we were to find out that someone working for us was suspected of committing a criminal offence, we will process that information if necessary, for our purposes and to the extent that this would be allowed under the applicable law.

If necessary and to the extent that this would be allowed under the applicable law, we will also require criminal background checks for certain roles – for example those working in financial roles or with minors.

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
Recruitment	Information concerning your application and our assessment of it, your references, any checks we may make to verify information provided, other background checks, and any information connected with your right to work. We will where necessary and as set out in this privacy notice also process information concerning your health, any disability, and in connection with any adjustments to working arrangements.	Contract Legal obligation Legitimate interests
Your employment contract including entering it, performing it and changing it	Information on your terms of employment including your hours and working patterns and your pay and benefits such as your participation in pension arrangements, life and medical insurance, and any bonus or share schemes.	Contract Legal obligation Legitimate interests



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Contacting you or others on your behalf	Your address and phone number, emergency contact information and information on your next of kin.	Contract Legitimate interests
Payroll administration	Information on your bank account, pension contributions and on tax and social insurance.  Your social insurance number or other government issued identifier.  Information on attendance, holiday and other leave and sickness absence.	Contract Legal obligation Legitimate interests
Financial planning and budgeting	Information such as your salary and (if applicable) bonus levels.	Legitimate interests
Supporting and managing your work and performance and any health concerns	Information connected with your work, anything you do at work and your performance including records of documents and emails created by or relating to you and information on your use of our systems including computers, laptops or other device (and any related monitoring will always be undertaken in a proportionate and as minimally invasive manner as possible).  Performance management information regarding you, including notes of meetings and appraisal records, and information you or our managers enter onto our training or appraisal platforms.  Information relating to your compliance with our policies.  Information concerning disciplinary allegations, investigations and processes and relating to grievances or complaints in which you are or may be directly or indirectly involved.  Information concerning your health, including medical or doctors' notes, return to work plans, and medical and occupational health reports.	Contract Legal obligation Legitimate interests
Changing or ending your working arrangements	Information connected with anything that may affect your continuing employment or the terms on which you work including any proposal to promote you, to change your pay or benefits, to change your working arrangements or to end your employment.	Contract Legitimate interests
Physical and system security	CCTV images.	Legal obligation



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	<p>Your IT account and directory information.</p> <p>Records of use of swipe and similar entry cards.</p> <p>Records of your use of our systems including computers, phones and other devices and passwords.</p>	Legitimate interests
<p>Improving efficiency of IT and business systems and device use, including in connection with Honey Bee Media efforts to maintain, improve and monitor cybersecurity</p>	<p>Records of your use of IT and business systems and Honey Bee Media devices.</p> <p>For example, we may collect information on the number of minutes and amount of data used on company mobile phones to ensure employees are on the most cost-effective tariff for their usage.</p> <p>We will where necessary and as set out in this privacy notice also contract with third parties so you can use third party applications on your company devices which may assist with your work (for example an application allowing 'one-click' dial in to conference calls). Such applications will process your personal data. Their own privacy notices will make clear precisely what information will be collected. We may be provided with information on the usage of such applications, for example for the purpose of troubleshooting or assessing overall usage and whether to continue to provide them.</p>	Legitimate interest
<p>Providing references in connection with your finding new employment</p>	<p>Information on your working for us and on your performance.</p>	<p>Consent</p> <p>Legitimate interests</p>
<p>Providing information to third parties in connection with transactions that we contemplate or carry out</p>	<p>Information on your contract and other employment data that may be required by a party to a transaction such as a prospective purchaser, seller or outsourcer.</p>	Legitimate interests
<p>Monitoring of diversity and equal opportunities</p>	<p>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. Please note we may share aggregated and anonymised diversity statistics with regulators if formally required / requested.</p>	Legitimate interests
<p>Monitoring and investigating suspicions of misconduct, compliance with policies and rules – both generally and specifically – but always in a</p>	<p>We expect our employees and workers to comply with our policies and rules and may monitor our systems to check compliance (e.g. rules on accessing pornography at work). We will where necessary and as set out in this privacy notice check system and other data to look into those concerns (e.g. log-in records, records of usage</p>	Legitimate interests



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proportionate and as minimally invasive manner as possible	and emails and documents, CCTV images). In appropriate cases, if we have suspicions of serious wrong-doing, we may make targeted records (e.g. video or sound) in connection with an investigation,	
Disputes and legal proceedings	Any information relevant or potentially relevant to a dispute or legal proceeding affecting us.	Legitimate interests Legal obligation
Trade union check off arrangements and Works Council administration	Details of trade union membership and deductions of contributions made at source.  Information relating to Works Council (or similar body) participation, including any communication you send to us if acting for the Works Council (if applicable).	Contract Legal Obligation
Day to day business operations including marketing and customer/client relations and travel on our behalf	Information relating to the work you do for us, your role and contact details including relations with current or potential customers or clients. This may include a picture of you for internal or external use.  Information regarding your travel arrangements and location.	Legitimate interests
Maintaining appropriate business records during and after your employment	Information relating to your work, anything you do at work and your performance relevant to such records.	Contract Legal obligation Legitimate interests

*Other processing activities that apply to cast, crew, production and talent*

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
Enabling the creation, sale and distribution / broadcast of a production you are working on including, but not limited to, marketing purposes	Information connected with your role including (if applicable) records of documents and emails created by or relating to you and information on your use of our systems including computers, laptops or other device.  If you have an on-screen or voiceover role this will likely involve processing images / video / audio of you.	Contract Legal obligation Legitimate interests

**WHERE THE DATA COMES FROM**

- When you start employment with us, the initial data about you that we process is likely to come from you: for example, contact details, bank details and information on your immigration status and whether you can lawfully



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work. We will, where necessary and as set out in this privacy notice, also require references and information to carry out background checks including information on your credit or criminal history, if that is required for your job role.

In the course of employment, you may be required to provide us with information for other purposes such as sick pay and family rights (e.g. maternity and paternity leave and pay). If you do not provide information that you are required by statute or contract to give us, you may lose benefits, or we may decide not to employ you or to end your contract. If you have concerns about this in a particular context, you should speak to Honey Bee Media.

6. In the course of your work, we may receive personal data relating to you from others. Internally, personal data may be derived from your managers and other colleagues or our IT systems; externally, it may be derived from our customers or those with whom you communicate by email or other systems.

### WHO GETS TO SEE YOUR DATA?

#### INTERNAL USE

7. Where necessary and as set out in this privacy notice, your personal data will be disclosed to your managers and administrators for employment, administrative and management purposes as mentioned in this document.

#### EXTERNAL USE

8. We will disclose your data if it is necessary for our legitimate interests as an organisation or the 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). Where necessary, we will also disclose your personal data if you consent, where we are required to do so by law and in connection with criminal or regulatory investigations.
9. Specific circumstances in which your personal data may be disclosed include:
  - Disclosure to organisations that process data on our behalf such as our payroll service, insurers and other benefit providers, our bank and organisations that host our IT systems and data;
  - Disclosure to external recipients of electronic communications (such as emails) which contain your personal data;
  - Disclosure on a confidential basis to a potential buyer of our company for the purposes of evaluation – but only if we were to contemplate selling;
  - 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;
  - Disclosure of aggregated and anonymised diversity data to relevant regulators as part of a formal request;
  - To third parties for the purpose of assessing efficiency of IT or business system device usage. In such cases the data sent to the third party will be anonymised where possible;
  - Disclosure as part of any marketing campaign for a production;
  - Disclosure and transfer disclosed to respond to law enforcement agency requests or where required by applicable laws, pursuant to court orders, or arbitral or tribunal orders or rules of procedure, or to





government regulations departments or agencies or regulatory bodies (including disclosures to tax and employment authorities), employment and any other regulatory bodies;

- Disclosure on a confidential basis to our advisers for example to our lawyers for the purposes of seeking legal advice or to further our interests in legal proceedings and to our accountants for auditing purposes; and
- Disclosure to our insurers.

#### **RETAINING YOUR PERSONAL DATA – MORE INFORMATION**

10. 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. In general, we will keep your personal data for the duration of your employment and for a period afterwards. In considering how long to keep it, we will consider its relevance to our company and your employment either as a record or in the event of a legal claim.

If your data is only useful for a short period (for example, CCTV or a record of a holiday request), we will delete it in accordance with this privacy notice.

Some data, such as production footage itself and credit information, will be kept indefinitely as we have an ongoing legitimate interest in retaining the product.

#### **ACCESS TO YOUR PERSONAL DATA AND OTHER RIGHTS**

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

You also 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 on it, including:

- Giving you a description and copy of the personal data
- 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 from which we can satisfy ourselves as to your identity.

As well as your subject access right, 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 you have provided us with data about yourself (for example your address or bank details), you have the right to be given the data in machine readable format for transmitting to another data controller. This only applies if the ground for processing is Consent or Contract.

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 before you withdraw consent.

#### **COMPLAINTS**

12. If you have complaints relating to our processing of your personal data, you should raise these with Honey Bee Media in the first instance. Finally, you may also raise complaints with your statutory regulator. For contact and other details ask Honey Bee Media.

#### **JOURNALISTIC EXEMPTION (IN RELATION TO CAST, CREW, PRODUCTION AND TALENT)**

13. Please note that owing to the nature of the work that you do for us (i.e. working on our or third parties’ productions) on some occasions Honey Bee Media will rely on exemptions to data protection rules in relation to journalistic



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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 various jurisdictions' data protection rules).

**STATUS OF THIS NOTICE**

14. This notice does not form part of your contract of employment and does not create contractual rights or obligations. It may be amended by us at any time. Nothing in this notice is intended to create an employment relationship between Honey Bee Media and any non-employee.

**United Kingdom**

If you are employed, engaged or otherwise in United Kingdom the following additional information applies.

The statutory regulator is the ICO.

The Data Controllers are the entities listed below and each of their affiliates:	Address
Honey Bee Media	Honey Bee Media Ltd Henleaze Business Centre, 13 Harbury Road, Henleaze, Bristol BS9 4PN

Employer Contact	Company
Data Protection Officer	Dee Hendry

Please note that this Privacy Notice, along with other related Honey Bee Media policies and/or protocols, shall form Honey Bee Media policy for processing special data as required by the UK Data Protection Bill 2018 (Schedule 1 Part IV).

Last updated 11 February 2021