

CONTRIBUTOR PRIVACY NOTICE

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1. INTRODUCTION

Who we are

We are Stellify Media NI Ltd (a company incorporated in England with company number 622768 and registered address of Office 3-5, 1st Floor, Merrion Business Centre, 58 Howard Street, Belfast BT1 6PJ and/or its affiliates and business divisions (collectively “we”, “us” or “our”). For the purposes of this Contributor Privacy Notice (“the Privacy Notice”) we are the Data Controller (this means we decide what happens to Personal Data in our control).

Who this Privacy Notice is for and what it covers

This Privacy Notice is for “contributors”. When we say contributors, we mean people who participate in, or contribute to, one of our programmes. This would for example include people who apply to be on a programme, people who appear on a show, people we consider for inclusion in a show, people we interview and/or people who provide information to us as part of a production. This Privacy Notice does not apply to crew, who should review the Cast & Crew notice by contacting Michelle Walsh, Head of Production at Stellify Media.

This Privacy Notice describes how we may collect, use, process, disclose or transfer information about you, or which identifies you or relates to you (your “Personal Data”) in our role as Data Controller in connection with your contribution or participation in one or more of our programmes (referred to in this notice as “the Programme”).

Our commitment to you

Your Personal Data is very important to us and we are committed to looking after it in line with applicable privacy and data protection laws. It is important that you read this Privacy Notice, together with any other privacy information we may provide to you, so that you are aware of how and why we are using your Personal Data.

We may update this Privacy Notice from time to time, so it is important that you review this Privacy Notice regularly to check for updates.

2. THE TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU

The types of Personal Data we collect about you will vary depending on the nature of your contribution, but we will commonly collect the following Personal Data:

- Basic information about you: name, image, contact information (email address, home address, phone number), age, date of birth, gender, nationality/residency status, visa details, driver's license.
- Information required for travel or logistics: availability, home address, travel preferences, accessibility requirements, passport details, travel-visa details, call sheets, emergency contact information.
- Information collected when you visit one of our offices or filming locations: visit details (time in, time out), CCTV footage (to the extent we are responsible for the operation of the CCTV and where permitted by applicable law).
- Information collected as part of your application to appear on a Programme: application forms or other questionnaires/forms you complete, test scores, audition tapes, photographs, availability, details of phone calls between us and you or other communications between us and you (emails and text messages), records of acceptance of terms and conditions.
- Information about your background: social media handles or aliases (e.g. Instagram, Snapchat, TikTok, Facebook, X, LinkedIn), social media posts or interactions, publicly available information about you (such as news reports, companies house data, information posted on the social media accounts of others), criminal background data (where permitted by applicable law), county court judgments against you, reports produced by third parties (such as social media background checking companies, or databases like Factiva or LexisNexis), information given to us by people who know you (such as friends or family), your work history, qualifications and experiences, information you choose to tell us about yourself as part of your contribution.
- Programme development information: research materials gathered about you (either from you, from publicly available sources, or provided by people who know you), notes, rushes, interviews, details of phone calls, correspondence between us and you (such as emails, text messages), this may include special categories of Personal Data.
- Production information: details of your role on a production, copies of release forms, rushes, video footage, audio clips, photos, information you disclose as part of your on-screen contribution, including potentially special categories of data.
- Payment details: bank account details, payments due to you.

Special Categories of Personal Data

Where permitted by applicable laws, we may also collect and use "special categories" of your Personal Data (referred to as Special Category Data), including:

- Information to comply with health and safety/duty of care obligations: health conditions, accessibility requirements, allergies or dietary requirements, reports prepared by healthcare professionals about your physical or mental health, covid testing results, incident reports (including details of the incident or accident and what happened), risk assessments.
- Equality and diversity data: where provided voluntarily and permitted by applicable law, data regarding ethnicity, whether you have a disability, sexual orientation, sex, gender/gender identity, including perceived equality and diversity data about you.

- Special categories of data you choose to provide to us as part of your contribution: trade union membership, political opinions, religious or philosophical beliefs, sexual orientation, health data, ethnicity or ethnic background.

We may also collect Sensitive Personal Data, such as information about your criminal background, which we treat in the same way as Special Category Data.

3. HOW WE COLLECT YOUR PERSONAL DATA

We collect your Personal Data from a variety of sources either directly from you or your activities in the course of your participation as a Contributor, or from third parties, subject to the requirements of applicable law.

From you

We collect Personal Data from you when:

- you complete an application form or any other questionnaires or forms we ask you to fill in as part of your contribution or participation in the Programme.
- You communicate with us, e.g., when you send messages to members of the production team.
- You are filmed by us as part of creating the Programme or as part of Programme development activities.
- You choose to provide us with information about yourself.

From third parties

We may also obtain your Personal Data from third parties such as:

- Information provided about you by people who know you (such as friends, family, colleagues etc.).
- Medical reports prepared by healthcare professionals.
- Third-party suppliers who carry out background checks on you (such as social media background checking companies, criminal referencing agencies (where permitted by applicable law), or other databases like Factiva or LexisNexis).
- Information from publicly available sources such as the internet or social media.
- Our professional advisors such as our insurers, lawyers, auditors or other advisors.
- Information provided by co-production partners, financiers, or the commissioning broadcaster/distributor.

4. WHY WE PROCESS YOUR PERSONAL DATA AND OUR LAWFUL BASIS FOR OUR USE OF YOUR PERSONAL DATA

The tables below show our purposes and lawful basis for processing (1) your Personal Data and (2) your Special Category Data and Sensitive Personal Data respectively.

We will only use your Personal Data when permitted to do so in accordance with data protection laws, which means that we will only process your Personal Data where we have a lawful basis for doing so, unless we believe that identifying a lawful basis would be: (i) 'incompatible' with our journalistic and/or artistic purposes, (ii) your Personal Data is being held with a view to publication, and (iii) there is a public interest in publication (the "Special Purposes Exemption"). We may process your Personal Data under the Special Purposes Exemption in connection with our Programmes.

For some processing activities we rely on our legitimate interests as our lawful basis for processing to the extent that the processing is necessary for the purposes of our (or a third party's) legitimate interests and is not overridden by your interests or fundamental rights and freedoms. We rely on legitimate interests only where we do not have your consent and are not relying on any of the other lawful bases set out in this table.

Following the exploitation of our Programmes, any information about you in them will have been manifestly made public by you and we may also continue to process it on that basis.

Table 1: Personal Data Processing

Purpose	Our lawful basis for processing your Personal Data
To contact you and general Programme administration.	Legitimate Interests. We have a legitimate interest in being able to contact you, so that we can respond to communications from you; make arrangements with you; and for the general administration of the Programme.
To process your application to appear on a Programme.	Legitimate Interests. We have a legitimate interest in assessing whether you meet our eligibility requirements to participate in one of our Programmes.
To assess your suitability to participate in the Programme.	Legitimate Interests. We have a legitimate interest in assessing your suitability to participate in the Programme, including whether your participation may result in any unwanted media attention for you, for us or for a commissioning broadcaster.
For Programme development activities and research.	Legitimate Interests. We have a legitimate interest in being able to research and develop Programme ideas to facilitate pitching the Programme to commissioning broadcasters or co producers; and to otherwise prepare or produce the Programme.
Producing the Programme, recording and editing.	Legitimate Interests. We have a legitimate interest in being able to produce the Programmes we make. Contract. We may also process this data for the purposes of performing a contract that we have between us and you.
To pay you any winnings owed, or any other reimbursements or remuneration as applicable.	Contract. Because the processing is necessary for the performance of a contract we have with you.
To promote, exhibit, distribute, exploit, publicise, advertise or otherwise commercialise the Programme in any media formats worldwide.	Legitimate Interests. We have a legitimate interest in being able to promote or commercialise the Programme.
To fulfil our contractual or legal obligations to Commissioning Broadcasters or co-producers	Legitimate Interests. We have a legitimate interest in being able to meet our contractual or other legal obligations to Commissioning Broadcasters or co-producers.
For business operational and administrative purposes.	Legitimate Interests. We have a legitimate interest in being able to process Personal Data in order to ensure the continued operation of the company. Legal Obligation. The processing is necessary for us to comply with a legal obligation.
To comply with a legal obligation or respond to requests from	Legal Obligation. The processing is necessary for us to comply with a legal obligation.

Purpose	Our lawful basis for processing your Personal Data
governmental authorities.	
Record Keeping	<p>Legal Obligation. The processing is necessary for us to comply with a Legal Obligation.</p> <p>Legitimate Interests. It is in the legitimate interests of the company to keep appropriate records.</p>

Table 2: Special Category Data and Sensitive Personal Data Processing

Purpose	Our lawful basis and condition of processing for processing your Personal Data
To assess your suitability to participate in the Programme.	<p>Legitimate Interests. We have a legitimate interest in assessing your suitability to participate in the Programme, including whether your participation may result in any unwanted media attention for you, for us or for a commissioning broadcaster; or whether you have any physical or mental health conditions which may not make you suitable to participate in the Programme.</p> <p>And</p> <p>Consent.</p>
To meet our health and safety and/or duty of care obligations to you and to others to create a safe production environment.	<p>Legal obligation. We have a legal obligation to comply with Health & Safety legislation to which we are subject.</p> <p>And</p> <p>Establishing, exercising, or defending legal claims. In the case of health data, because it is necessary for the establishment, exercise or defence of legal claims.</p> <p>Consent. In the case of criminal background information, we rely on your consent.</p>
For Programme development activities and research.	<p>Legitimate Interests. We have a legitimate interest in being able to research and develop Programme ideas to facilitate pitching the Programme to commissioning broadcasters or co producers; and to otherwise prepare or produce the Programme.</p> <p>And</p> <p>Consent. In the case of special category data, we rely on your consent.</p>
Producing the Programme, recording and editing.	<p>Legitimate Interests. We have a legitimate interest in being able to produce the Programmes we make. We may also process this data for the purposes of performing a contract that we have between us and you.</p> <p>And</p> <p>Consent. In the case of special category data, we rely on your consent.</p>
To enable us or Commissioning Broadcasters to monitor or keep under review equality of opportunity or treatment.	<p>Legitimate Interests. We have a legitimate interest in being able to monitor or keep under review equality of opportunity or treatment on our Programmes.</p> <p>And</p> <p>Substantial public interest. In the case of Personal Data related to your ethnicity, sexual orientation, disability data and gender identity, to the extent the processing is necessary for the performance of a task carried out in the public interest and as permitted by applicable law, we rely on the Substantial Public Interest of identifying or keeping under review the existence of absence</p>

	of equality of opportunity or treatment between groups of people with a view to enabling such equality to be promoted or maintained.
To fulfil our contractual or legal obligations to Commissioning Broadcasters or co-producers	Legitimate Interests. We have a legitimate interest in being able to meet our contractual or other legal obligations to Commissioning Broadcasters or co-producers. And Consent.
Medical emergencies or medical incidents during production.	Consent. Or if not viable, vital Interests. Because it is necessary in order to protect your vital interests.
Fulfilling our duty of care obligations, providing aftercare and support.	Legal Obligation. We have a legal obligation to comply with Health & Safety legislation. And Consent. Or if not viable, vital Interests. Because it is necessary in order to protect your vital interests.

5. HOW WE SHARE YOUR PERSONAL DATA

Your Personal Data will be accessed or used by those working on the Programme on a need to know basis, including:

- Members of the production team involved in making the Programme.
- Affiliate sharing. We may share your Personal Data with Sony Pictures Entertainment (SPE) production companies and/or non SPE production companies and entities who are affiliated with us for operational purposes permitted under applicable law.
- Other internal teams such as legal, health and safety, finance, HR, IT, marketing and distribution teams.

We may share your Personal Data as necessary with third parties, such as:

- Service Providers engaged by us to act on our behalf to assist with producing the Programme such as: taxis, travel operators, catering companies, healthcare professionals, social media background checking companies, criminal referencing agencies, IT services providers, fixers, editors, freelance crew members.
- Co-production partners, financiers, the commissioning broadcaster/distributor.
- Insurance companies, in connection with obtaining appropriate cover, making or defending claims.
- Professional advisors such as our insurers, banks, lawyers, consultants, auditors, financiers or other professional advisors. These advisors will generally be independently responsible for how they use your Personal Data in order to provide services to us and to comply with their own regulatory obligations.
- Regulatory and/or Law Enforcement Agencies. Where required in order to comply with a legal obligation; when we believe in good faith that the law requires it; at the request of governmental authorities; conducting an investigation; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of us or third parties. Such disclosures may be carried out without additional notice to you.
- Business Transfers. Potential purchasers or investors and our and their advisors in relation to a business transaction, such as the financing and distribution of the production, a merger, change of control or sale of assets.

6. INTERNATIONAL TRANSFERS

We may transfer your Personal Data to a jurisdiction where data protection and privacy regulations do not offer the same level of protection as your home country (such as group companies in the United States of America, or third party suppliers or partners located outside the EEA). In these cases, we implement appropriate safeguards in line with applicable data protection law such as standard contractual clauses adopted by the competent EU or UK authorities. If you are located in the UK or the EEA, you may contact us for a copy of the safeguards which we have put in place.

7. HOW LONG WE STORE YOUR PERSONAL DATA

We will retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal and accounting requirements. To determine the appropriate retention period for Personal Data, we consider factors, including the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use/disclosure of your Personal Data, and the purposes for which we process your Personal Data. Where information is used for more than one purpose, we will retain it until the purpose with the latest period expires, or shorter, if processing is based on your consent and you withdraw your consent. We will follow the retention practices described above, unless we believe that it would be appropriate to rely on the Special Purposes Exemption.

Please note, we retain a record of those involved in the Programme for our records and any Personal Data contained within the final version of the Programme, and any related marketing, will be publicly available on a permanent basis.

For more information about our retention policies, please contact us using the contact details below.

8. SECURITY

We maintain reasonable technical and organizational security measures as prescribed by applicable law that are designed to protect your Personal Data from unauthorized access, use, misuse, modification, disclosure and destruction. Nevertheless, transmission via the internet and online digital storage are not completely secure and we cannot guarantee the security of your information collected online.

9. YOUR RIGHTS

You have a number of rights in respect of your Personal Data, including:

- The right to object to and or restrict our processing of your Personal Data
- The right to request access to the Personal Data that we hold about you;
- The right to request that we correct inaccurate Personal Data we hold about you;
- The right to request that we delete your Personal Data;
- The right to request that we provide your Personal Data to you in a portable format.

Please note however that most of these rights are not absolute and are limited to certain defined circumstances. Accordingly, we may not be able to fulfil some requests that we receive from you. Where we rely on 'consent' to process your Personal Data, you have the right to withdraw your consent at any time.

We will handle any request to exercise your rights in accordance with applicable law and any relevant legal exemptions. If you wish to exercise any of these rights please contact Vikkie Taggart, Director of Operations at Stellify Media.

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights) unless such request is clearly unfounded or excessive; in such circumstances we may charge a reasonable fee or refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

If you have concerns about the way in which we have handled your personal data, you should contact us in the first instance. If you are still dissatisfied, you have the right to complain to your local supervisory authority, in the UK this is the Information Commissioner's Office at <https://ico.org.uk/>.

10. CHILDREN'S DATA

If you are a parent or a guardian of a contributor who is a child, then it is important that you share a copy of this Privacy Notice with them and explain its content and what it means to them. If you or your child has any questions about this Privacy Notice, please contact us using the information provided below.

11. CONTACT US

If you have any questions about this Privacy Notice or how and why we collect, process, store and transfer Personal Data, please contact Michelle Walsh, Head of Production at Stellify Media.