

BIGGER BANG

BIGGER BANG COMMUNICATIONS PRIVACY POLICY

Bigger Bang Communications (“Bigger Bang”) strongly values the importance of protecting the privacy of its staff, contributors and all those (including third parties) involved in the creation, production and distribution of its content. This Privacy Policy sets out those procedures and measures we use in order to protect all Personal Data collected, stored or otherwise processed. It will tell you how we look after your personal information and inform you of your rights and how you can control what we do with your personal information.

This Privacy Policy is drafted in line with UK data protection law and guidance.

Bigger Bang Communications reserves the right to amend this policy as needed, for example, to comply with changes in laws, regulations, corporate practices and procedures or requirements imposed by data protection authorities. Any modification will come into force immediately from the date on which the updated policy is distributed

Personal data we collect about you

- Information from you – contact information or any other information in relation to any enquiries, or other issues. This can include names, addresses, images of individuals, telephone numbers, personal email addresses, bank and pay roll details including NI number and tax status, passport particulars, dates of birth, next of kin, internet protocol addresses and information automatically collected when an individual uses a computer/the internet (“Personal Data”).
- Social media data – When such access is made to our website or other on-line services from a social media service or you direct us to social media services, you are authorising us to collect and use such personal data in accordance with this Privacy Policy.
- Other Sources – We may supplement the information we collect with information from other sources, such as publicly available information about your online and offline activity from social media services and commercially available services.
- Collection of Personal Data includes, whether or not by automatic means, collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure (including by transmission, dissemination or otherwise making available), alignment or combination, blocking, erasure or destruction of said data .

Looking after your personal information

You have certain rights in respect of your personal data.

To meet our obligations under the law and uphold your rights as data subjects, we will:

- provide clear information about the collection and use of your personal information including any third-parties with whom we share it
- provide access to any personal information we hold in an easily accessible format
- ensure any inaccurate or incomplete personal information about you can be rectified
- allow you to object to or restrict processing of personal information where you feel there are grounds to do so
- ensure deletion of personal data when there are no longer legal grounds to retain it

When you get in touch, we will respond without undue delay and in any event within one month (unless we notify you otherwise). We may also ask you to verify your identity before we provide any information to you. The information provided to you will be in a commonly used and easily readable format. There is no charge for most requests, but if you ask us to undertake an excessive task to identify your personal data we may ask you to pay a reasonable admin fee, taking into account the administrative costs of providing the information. Please also be aware that, as explained below, these rights will not apply to the extent that they are incompatible with the Special Purposes (see ‘*Special Category Data*’).

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Recruitment Applicants and Prospective Applicants

Your personal information will be used for recruitment purposes by us. The personal information may include information in your CV or application form or during interviews or recruitment communications. This includes name, address, email address, employment history, qualifications, age, gender, interests. We may also collect information about any disability you may have and your race or ethnicity. Such information may be obtained from you or from third party recruitment platforms (eg Talent Manager, LinkedIn) and agencies.

The information about you may be verified by:

- performing background checks using your publicly available social media platforms
- checks obtained lawfully from third parties engaged by us for verification purposes such as data intelligence services and any organisation authorised to provide basic criminal history checks (only as required by law such as safeguarding or if the role requires a high degree of trust and integrity)
- you may also be asked to provide us with documentation to verify personal information provided by you

We process personal information to:

- Communicate with you about your application / recruitment process
- Analyse and monitor the diversity of our applicants in accordance with applicable laws
- Verification checks on background and references
- Keep HR records
- Assess skills, qualifications and suitability for available work
- Comply with our legal and regulatory obligations

Employees and Freelancers

This Privacy Policy covers how we collect, store, use and disclose personal information for everyone working at Bigger Bang.

Contributors and Talent

This Privacy Policy covers any applicants, participants, contributors, performers, presenters and audience members who may be featured in programmes or projects which Bigger Bang intends to produce.

In addition to the standard Personal Data as set out in this policy we may also collect: appearance (including an image of you), footage of you; interests, personality, previous appearances on television, family life etc, political opinion, dating preferences/sexual life, genetic data, religious or philosophical beliefs and trade union membership.

We will obtain most of your personal information directly from you or your representatives (if any). We may also conduct background checks to verify personal information about you. These checks could include checks of information that is publicly available online, including information you have made public via social media and checks obtained lawfully from third parties engaged by us for verification purposes such as any organisation authorised to provide basic criminal history checks. You may also be asked to provide us with documentation to verify personal information provided by you.

We process personal information where necessary for our legitimate interests, as listed below, and where our interests are not overridden by your data protection rights:

- to assess your suitability to take part in the Programme and if successfully chosen, for any purposes we may reasonably require in order to develop, cast, produce, distribute and/or market the Programme and any associated online content, publicity, promotion and/or distribution materials
- to communicate with you about your application
- to use your data in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such data in connection with legal process or litigation)
- to analyse and monitor the diversity of our applicants in accordance with applicable laws.

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You give us consent in respect of any sensitive personal data that you provide to us as part of the application process- where it is absolutely necessary and proportionate to do so.

You give us consent in respect of marketing communications as part of the application or otherwise about the Programme and casting for the Programme and about future programmes or series which Bigger Bang may develop and/or produce.

You give us consent for purposes which are required by law: Health and Safety and for us to meet our legal and regulatory obligations to safeguard the welfare of you, the other participants.

See Special Category Data section of this policy for use of your sensitive personal data.

Why personal Data is collected

We collect data as part of our television production and distribution business activities which includes the production, promotion, administration and management of Bigger Bang's output.

Bigger Bang may also process Personal Data to fulfil legal obligations, including regulatory and compliance and insurance requirements.

In addition, we may disclose your Personal Data to third party service providers, members and agents for administration, management purposes and meeting statutory requirements only.

Special Category Data

The General Data Protection Regulation ("GDPR") and the Data Protection Act 2018 ("the Act") require us to use your Personal Data within the legal framework explained in this Privacy Policy.

In certain circumstances we also use special category data concerning race, ethnic origin, politics, religion, trade union membership, genetics, physical or mental health matters biometrics (where used for ID purposes), sexual orientation and criminal offence data ("Special Category Data"). Such Special Category Data is only collected where it is absolutely necessary and appropriate to do so.

UK law means we will never collect special category data about anyone without their explicit knowledge and consent (given verbally or in writing) unless there is some other legal basis for doing so, for example we consider that the special purposes journalism, art and literature exemption applies and it would be in the public interest to process such data without your consent. Consequently, please be aware that aspects of the legal framework explained in this Privacy Policy and your rights under the GDPR may not apply where they are not compatible with the Special Purposes ("Special Category Data").

We may use your Special Category Data where one of the following applies:

- legal and regulatory obligations, for example, for the health and safety of our programme contributors, staff and others, or for the purposes of Ofcom's functions
- protecting your vital interests or the vital interests of another individual, where you are not capable of giving consent
- where you have manifestly made the information public (including where you do so when participating in any programme)
- where necessary for you to receive medical treatment from a registered medical professional

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- o for editorial purposes where we have your explicit consent, unless there is some other legal basis for doing so, for example we consider that the special purposes journalism exemption applies and it would be in the public interest to process such data in connection with our programme making without your consent

As information must be about a person who is identified or identifiable to constitute “Personal Data”, this policy does not cover data which is anonymised or where pseudonyms are used successfully. Data is anonymised if individuals are no longer identifiable. Using pseudonyms successfully involves replacing names or other identifiers with substitutes, so that identification of individuals is impossible.

Our Responsibilities

Bigger Bang ensure that all employees, freelancers, contractors, directors, workers, volunteers, interns and agents employed (“Personnel”) have read and understood the Bigger Bang GDPR/Data Protection Policy and Privacy Policy and retain a record that they have done so;

Bigger Bang ensure that all Personnel comply with the Bigger Bang GDPR/Data Protection Policy and Privacy Policy and that there are adequate procedures and facilities to enable them to do so. This includes ensuring that all relevant Personnel attend data protection training where needed and managing data protection questions from Personnel.

Our Practical Measures

For each production/development project, where relevant, we put in place :

- a) a kick-off meeting with relevant production manager(s) and/or legal and business affairs team(s) addressing data protection including what Personal Data is to be collected and who should have access to it;
- b) Password protection/protocol - all employees, freelancers, contractors, directors, workers, volunteers, interns and agents using Bigger Bang computer hardware and software are given personal log-in passwords to each computer to protect privacy and data safety These also apply to accessing emails and information on personal devices. Senior members of the company have additional two step authentication for more sensitive (eg financial) information.
- c) a process is established for data storage for each production/development project. This will include where data protected information is kept and who has access to it. Each new production/development project has a folder created on the production network drive / secure dropbox / secure googledrive . All files containing Personal Data are kept within this production folder. Access to such folder is only be granted to those with data clearance and to top level management.
- d) A system ensuring that any software used to process Personal Data is secure and updated in accordance with any instructions issued by Bigger Bang’s IT team EUROSYSTEMS and any applicable IT policies- For further information please contact James Glancy our EUROSYSTEMS support Manager Email JGlancy@euro-systems.co.uk / Main Tel: 0844 567 5029 Support Tel: 0844 567 5043 Web: www.euro-systems.co.uk Head Office: 7000 Academy Park, Gower Street, Glasgow G51 1PR
- e) Meetings so that any data protection issues are addressed as an agenda item at each production debrief at the end of each production/development project - what data needs to be retained and for how long, where the electronic and hard copy will be stored and how to ensure that it is accurate and up to date. If Personal Data that has been collected and stored is no longer required, it will be securely destroyed; If there is data that needs to be securely destroyed, it will be done so with the following methods:
 - i)Physical documents including those with bank and credit card numbers, personal information, phone numbers or addresses , legal and medical information, and passwords or your signature should be SHREDDED or redacted using a redacting pen to obscure data by covering it in indelible ink – then disposed of the paper in the recycling .

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ii) Computer/ drive data: the event that drives need to be securely wiped (beyond normal wiping / reformatting procedures,) we will contact our IT provider EUROSYSYSTEMS Support Tel: 0844 567 5043 www.euro-systems.co.uk and they will advise you of a suitable programme to do so.

f) Data breach protocol.

A Bigger Bang data breach protocol incident includes but is not restricted to, loss, theft or failure of confidential or sensitive data or equipment on which such data is stored (e.g. loss of laptop, USB stick, iPad / tablet device, or paper record), system failure, unauthorised use of, access to or modification of data or information systems, unauthorised disclosure of sensitive / confidential data, website or hacking attack, unforeseen circumstances such as a fire or flood, human error or instances where information is obtained by deceiving the organisation who holds it .

The Data Protection Officer(s) will determine if the breach is still occurring and appropriate steps will be taken immediately to minimise the effect of the breach. The Data Protection Officer(s) will assess the type of data involved, its sensitivity, any protections in place (e.g. encryptions), if the data been lost or stolen , whether the data could be put to any illegal or inappropriate use, the number of individuals involved and the potential effects of the breach

Every incident will be assessed on a case by case basis. If, after this assessment, it's likely there will be a risk, Bigger Bang will notify the Information Commissioner's Office (ICO). Bigger Bang will **report** a notifiable breach to the ICO without undue delay, but not later than 72 hours after becoming aware of it. Not every incident warrants notification and over notification may cause disproportionate enquiries and work.

Individuals whose personal data has been affected by the incident, and where it has been considered likely to result in a high risk of adversely affecting that individual's rights and freedoms, will be informed without undue delay. Notification will include a description of how and when the breach occurred and the data involved. Specific and clear advice will be given on what they can do to protect themselves and include what action has already been taken to mitigate the risks. Bigger Bang will consider notifying third parties such as the police, insurers, banks or credit card companies. This would be appropriate where illegal activity is known or is believed to have occurred, or where there is a risk that illegal activity might occur in the future.

Once the initial incident is contained, the Data Protection Officer(s) will carry out a full review of the causes of the breach; the effectiveness of the response(s) and whether any changes to systems, policies and procedures should be undertaken.

How long we keep data

We may retain your information for a reasonable period in accordance with legal requirements or in the event of future opportunities with us.

The nature of Bigger Bang's activities may require data to be kept for a long period of time however rights and freedoms of individuals will continue to be of paramount importance to Bigger Bang and regular consideration is given as to whether the data is still being processed for the purpose it was obtained and whether it is reasonable and proportionate to continue to process such data.

On termination of personnel's services they will return and/or destroy all Personal Data/Information obtained while providing their services except where we have obtained the necessary permissions to retain such data.

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Sharing Data

From time to time in the ordinary course of business, Bigger Bang may be required to transfer Personal Data to external third parties contracted by or on behalf of Bigger Bang to perform certain employment-related or other business-related services. These would include broadcasters, insurers or suppliers assisting us with the production and distribution of our programmes.

We will only send your personal information outside of the European Economic Area ("EEA") if you have instructed us to do so (prior written consent) with or to our agents and advisors to fulfil our Bigger Bang activities . If we do transfer your personal information outside of the EEA, we will make sure that the recipients protect your information to the same standards as if it was being used in the EEA

Bigger Bang may also disclose certain Personal Data to certain third parties where it is required to do so by the laws of any relevant jurisdiction or any competent regulatory or governmental body or authority; or in an emergency, where the health or security of Bigger Bang personnel is endangered,

Bigger Bang ensures that they have contracts in place with such third parties which provide that such third parties must comply with all applicable data protection laws and obligations equivalent to those set out in this policy. If Bigger Bang concludes that a supplier is not complying with these obligations, it will take appropriate actions including suspending the transfer of any further Personal Data, demanding the return or destruction of Personal Data already shared with such third party; and/or terminating the agreement with the third party.

Please note that all transfers of Personal Data will be conducted in a secure manner using appropriate and secure solutions - these will, if needed, be overseen for safety by our IT support EUROSYSTEMS: Support Tel: 0844 567 5043 www.euro-systems.co.uk

Bigger Bang will never use Personal Data for marketing purposes without the prior consent of the relevant individual.

Data Protection Officers

Bigger Bang has a Data Protection Officer, who is primarily responsible for Bigger Bang's compliance with this Privacy Policy.

Each Data Protection Officer will ensure that their teams take appropriate technical, physical, and organizational measures to protect Personal Data against unauthorised access, unlawful processing, accidental loss or damage, and/or unauthorised destruction.

Data Protection Officers will undertake yearly reviews of what Personal Data has been acquired, processed or stored and ensure that all such Personal Data is relevant for the purpose and is not excessive.

All senior executives, managers, legal and business affairs and IT teams fully familiarize themselves with this policy, its requirements and provide appropriate support to their Data Protection Officer.

DATA PROTECTION OFFICERS CONTACTS

Contact Name

PRIMARY: Donna Blackburn
HEAD OF PRODUCTION

Contact email

donna@biggerbang.tv

Contact telephone

D:020 71477423

SECONDARY: Carolyn Bowie
HEAD OF FINANCE

CarolynBowie@biggerbang.tv

D:020 71477423

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FURTHER INFORMATION

Further information about data protection compliance and best practice guidelines is also available on the applicable regulator's website:

A. <http://www.ico.gov.uk/> UK: Information Commissioner's Office –

B. <https://www.ftc.gov> USA: Federal Trade Commission

You also have the right to complain to the Information Commissioner's Office in the UK or equivalent regulator if based outside the UK.