

IGENERATION STAFF AND CONTRACTOR PRIVACY NOTICE

Last updated: July 2025

1. INTRODUCTION	
Who are we?	IGENERATION STUDIOS LIMITED, incorporated in England & Wales with company registration number 12219439 and registered office address 66-67 Newman Street, London, W1T 3EQ Where we decide the means or purpose of processing your personal data, we are the "data controller".
What's this policy about?	Prior to and throughout your time of employment or engagement and for a period thereafter, we will collect, use, and store personal data about you. This policy covers employees, workers, contractors, applicants and other staff and explains how we process your personal data as a data controller. We update this policy from time to time. Where appropriate, we will actively notify you.
What are your rights?	Users have the following rights, although these rights may be limited in some circumstances: • Ask us to send a copy of your personal data to you or someone else • Ask us to restrict, stop processing, or delete your personal data • Object to our processing of your personal data • Object to use of your personal data for direct marketing purposes • Ask us to correct inaccuracies in your personal data If we rely on consent to process personal data you can withdraw consent at any time. To make a request for your rights, please let us know by sending an email to the email address set out in the next section below. You also have the right to submit a complaint to a supervisory authority. For example, in the UK, you can get in contact with the Information Commissioner's Office: https://ico.org.uk. If you live in a European country, you can alternatively submit a complaint to the supervisory authority in your country/state. If you live outside of those territories, you may have a supervisory authority in your country whom you can also turn to.
How do you contact us?	If you have any questions concerning this policy, including how you can exercise your rights, please contact us at: Kevin@igenerationstudios.com.

2. YOUR PERSONAL DATA AND HOW WE USE IT		
Your data	Purposes of processing	Sources
Contact Data • Name	• Recruitment • Right to Work	We collect this information from

• Address, telephone, email and other contact (personal and work) details • Age, gender, marital status, location <u>How long we keep it</u> Until up to 7 years from the end of the tax year when our relationship with you ends.	• Employment • Leave Administration • Finance & Accounting • Health & Safety • Crime & Fraud	you directly, or from our/your recruitment consultants or platforms.
<u>Recruitment Data</u> • CV, portfolios, professional and academic qualifications and experience • Details of educational background, copies of diplomas, degree certificates, transcripts, training records and other evidence of academic achievement or work experience • Skills and language capabilities • Professional licences, certifications, accreditations or memberships • Information supplied in interview or through assessments or telephone-screening • References • Offer letters and associated correspondence • Personal data in your CV or provided in relation to your recruitment. • Inferences and opinions drawn from Recruitment Data. <u>How long we keep it</u> 6 years from when our relationship with you ends. Or, if you apply for a job, and are unsuccessful, for 6 months subsequent to any interview or assessment).	• Recruitment • Right to Work • Employment • Health & Safety • Crime & Fraud	We collect most of this information directly from you. We may also receive information from our/your recruitment consultants or platforms. We may also obtain some of this from public social media profiles, from your referees, academic institutions, and professional accreditation bodies.
<u>Right to Work Data</u> • ID and right to work documentation (e.g. driving licence, work permits, birth certificates, residency status, passport, visas, citizenship documentation) <u>How long we keep it</u> 2 years from when our relationship with you ends.	• Recruitment • Right to Work • Employment • Crime & Fraud	We generally collect this information from you but may compare it with information held by us or available on public records.
<u>Key Contact Data</u>	• Health & Safety • Crime & Fraud	We collect this information from you. Please

Spouse, partner, next of kin and emergency contact details including email, address, telephone number. <u>How long we keep it</u> Until 12 months after our relationship with you ends.		ensure that, where you provide us with this sort of information, the individuals concerned receive a copy of this policy and are happy for you to provide their information.
<u>HR Data</u> - Role, contract, date of (and reasons for) hire, start, promotion, resignation, termination, employee ID number - Acknowledgement of handbook, policies, and codes of conduct - Pension information - Salary, bonuses, rewards, sick pay, compensation history, student loan, and bank details - National Insurance, PAYE, tax, social security, residency, other taxpayer or government identification numbers, and payroll, payslip records, and tax status information - Where required, driving details (copy of licence, licence number, vehicle registration, motor insurance including cover for business use) - Where required, driving history where company cars are used (such as relating to parking fines, collisions, accidents, related insurance claims) - Where required, personal vehicle information (including vehicle registration, type, manufacturer, model, engine size and fuel type) - Clothing size - Location of workplace - Working hours, time records, flexible working requests, work history, training records - Performance history, achievements, letters of recommendation, complaints and awards - Performance review, appraisals, hearing, investigation, warning, disciplinary and grievance records (including records of monitoring compliance with and enforcement of policies)	- Recruitment - Right to Work - Employment - Leave Administration - Finance & Accounting - Health & Safety - Diversity Monitoring - Crime & Fraud - Monitoring & Security	We collect much of this information from you directly. Some of this information is generated by you or us in the course of your work with us. Certain other information, for example relating to your performance, may be collected from colleagues and others you work with. We may also receive some of this information from HMRC or other authorities, or corporate credit or debit card providers and other suppliers we work with.

• Absence and leave data (including sickness, paternity/maternity/adoption, shared parental, annual and other leave, and associated forms, certificates and other related documentation) • Payment information for business credit or debit cards, limits, account details, how and where they are used or authorised for use. <u>How long we keep it</u> Until up to 7 years from the end of the tax year when our relationship with you ends.		
<u>Production Data</u> • Name • Date of birth • Residential address and address history • Contact information (such as email address and telephone number) • Social media usernames and associated content, including profile pictures • Video and/or audio recordings, still imagery, scripts, concepts, or manuscripts that might contain your personal information, including your image, words, opinions, age, sex, ethnicity and if relevant to the specific production, other aspects such as health, disabilities, etc. <u>How long we keep it</u> We will keep audio and video footage that may contain your personal data for 7 years from the expiry of the relevant broadcaster license period, unless the footage has commercial value for clip sales or similar. Do note that if you feature in a production then such production containing your personal data may be publicly distributed across various channels.	• Production • Distribution • Leave Administration • Finance & Accounting • Health & Safety • Monitoring & Security	We collect this data directly from you and when we record you in order to make our productions.
<u>Distribution Data</u> • Name • Video and/or audio recordings, still imagery, scripts, concepts, or manuscripts that might contain your image and other personal information, including your image,	• Distribution	We collect this data directly from you and when we record you in order to make our productions.

words, opinions, age, sex, ethnicity and if relevant to the specific production, other aspects such as health, disabilities, etc <u>How long we keep it</u> We will keep audio and video recordings that may contain your personal data in perpetuity for future use in other productions and onward distribution. Do note that if you feature in a production then such production containing your personal data may be publicly distributed across various channels.		
<u>Casting Data</u> • Name • Date of birth • Residential address and address history • Contact information (such as email address and telephone number) • Social media usernames and associated content, including profile pictures • Personal characteristics and lifestyle information • If relevant to the nature of a production, Information regarding your health, including any disability or medical conditions (including psychological conditions), your dental, health and sickness records, information about physical limitations, visual or hearing impairment and special needs <u>How long we keep it</u> We retain this information until the end of a production unless you give express consent for wider use in which case it is kept for up to 7 years only. The application forms for cast included in a production are kept electronically for the life of the production.	• Recruitment • Right to Work • Employment • Diversity Monitoring	We collect this data directly from you (including where we invite you to submit an online application form through our Website). We also collect this data through third party services providers, including Meta, Instagram and X.
<u>Work Data</u> • Content featuring you produced for use as part of productions, and also on our website, social media or other marketing, such as your website photograph, audio, videos, articles, blog posts, speech transcripts.	• Recruitment • Right to Work • Employment • Leave Administration • Finance & Accounting • Diversity Monitoring • Health & Safety • Monitoring & Security	We collect much of this information from you directly. Some of this information is generated by you

Information produced during your engagement or employment, including email, voicemail, correspondence, calendar items, usernames, paper and electronic documents, and other work product and communications created, stored, transmitted or accessed via our networks, software, devices (such as work mobile, laptop or other equipment) or systems. <u>How long we keep it</u> We keep this information until it is no longer necessary for the purpose of operating our business, and for at least 6 years following the end of your engagement/employment.	Crime & Fraud	or us in the course of your work with us. Certain other information, for example relating to your performance, may be collected from colleagues and others you work with. We may also receive information from our clients or suppliers and others we work with.
<u>Equality Data</u> Information relating to race, health, disability, ethnicity, gender identification, nationality, religious beliefs, sexual orientation, philosophical or political opinions, your preferred pronouns. <u>How long we keep it</u> Until our relationship with you ends.	Diversity Monitoring	We collect this from you directly.
<u>Health Data</u> Information regarding your health, including any disability or medical conditions (including psychological conditions), your dental, health and sickness records, information about physical limitations, visual or hearing impairment and special needs. <u>How long we keep it</u> Until our relationship with you ends.	Health & Safety	We collect this from you directly.
<u>Vetting Data</u> Information regarding criminal convictions & offences, inc. criminal record checks <u>How long we keep it</u> [Please confirm]	- Employment - Right to Work - Health & Safety - Crime & Fraud	We collect this from you directly, from public authorities, or credit reference agencies.

<u>IT & Security Data</u> • CCTV footage • Key/swipe card and other security pass identifiers, photographs and ID • Date, time, nature and location of access to (or through, including internet activity, browsing/search history, and interaction with websites and applications) our systems, data and premises • Details of phone, laptop, computer and other devices used to connect to our systems or otherwise in the course of your work • Usernames and passwords <u>How long we keep it</u> CCTV footage is retained in accordance with the retention policy set by the building's landlord. Other data will be kept until our relationship with you ends.	<u>Purposes</u> • Employment • Health & Safety • Monitoring & Security • Crime & Fraud	We collect some of this information from you directly, and some of it is collected through our systems as you use them or from our information technology and security service providers.
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3. PURPOSES AND LAWFUL BASIS	
Purpose description	Our legal basis for this processing
<u>Recruitment</u> We use this information to make a decision about your recruitment or appointment, or your promotion, and to determine the terms on which you work for us, and whether you are suitable for the role you are applying for (internally or externally)	Our and your legitimate interests in ensuring that you are the right candidate for the role, suitably qualified and experienced, presenting you with the opportunity to be casted for roles in our productions, and that the terms of your prospective engagement meet our mutual expectations and our business objectives.
<u>Right to Work</u> We use this information to ensure you are entitled to work for us in the country where you are engaged.	Our legal obligation to ensure you are entitled to work for us in the country where you are engaged.
<u>Diversity Monitoring</u> We use this information to ensure meaningful equal opportunity in our workplace, to monitor and report on the same (including in respect of diversity generally, pay equity, and otherwise) and to ensure staff are referred to using the pronouns they prefer where feasible.	Our legitimate interest (and your interest, and that of the public) in identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people with a view to enabling such equality to be promoted or maintained, and in seeking to ensure our personnel are referred to using the pronouns they prefer.

<u>Production</u> We use this information for the purposes of arranging for the creation of iGeneration productions and to plan future productions.	We process personal data for this purpose to: (i) for the performance of a contract to which you are party or to take steps at your request prior to entering into a contract (such as to perform obligations under or enter into an agreement relating to your involvement in a TV production); and (ii) for the purposes of our legitimate interests, being our interests in securing the necessary rights to be able to feature you in our productions; and (iii) to comply with our legal obligations.
<u>Distribution</u> We use this information for the purposes of arranging for the sale, distribution, commercialisation and marketing of iGeneration productions, and to plan future productions.	In order to pursue our and your legitimate interests, being our mutual legitimate interests, in ensuring our business and your contribution to it are successful through commercialisation of the productions that you contribute towards.
<u>Employment</u> (inc. contractor engagement) We use this information to: (i) administer the contract we have entered (or will enter) into with you; (ii) provide access to our systems, services, premises & facilities; (iii) arrange travel, visas, accommodation and insurance (e.g. motor insurance for business where applicable, or insurance for remote working equipment stored at your home); (iv) enable your education, and to support training and development requirements; (v) manage HR processes e.g. performance, disciplinary, and grievance reviews and procedures, salary reviews, and to deal with legal disputes which might involve you; (vi) make decisions about your continued employment or engagement, making arrangements for the termination or	We process personal data for this purpose to: (iv) perform our agreement with you, or to take steps prior to entering into such agreement; (v) pursue our and your legitimate interests, being our mutual legitimate interests in ensuring our business and your contribution to it are successful, that you are able to, and do, discharge your duties, that performance is recognised or rewarded appropriately, that developmental needs are understood and met and that disciplinary matters and concerns are understood and addressed correctly; and (vi) comply with our legal obligations.

expiration of our working relationship with you; (vii) assess your qualifications for a particular job or task, and enable you to discharge your duties; (viii) notify staff (e.g. via SMS or telephone) if there is an issue affecting a studio such as a power cut or internet outage); (ix) promote our business and personnel, for example by providing an employee bio with our business partners; (x) to send promotional or "thank-you" items to staff; (xi) produce & distribute promotional written and audio-visual content, including video of our events, offices and staff; and (xii) conduct data analytics studies to better understand staff retention and attrition rates.	
<u>Leave Administration</u> We use this data to administer statutory and contractual leave entitlements including sickness and other absences.	Our respective legitimate interests in ensuring absence and cover are dealt with appropriately. To perform our contractual obligations to you and to comply with our legal obligations.
<u>Finance & Accounting</u> We use this information to pay you (salary and expenses, e.g. fuel/mileage where authorised) and, if you are an employee, deduct tax and National Insurance contributions, and for the purposes of maintaining our accounts.	To perform our contract with you, or take steps requested by you prior to entering a contract, and to comply with our legal obligations. We may also process this personal data for tax management and planning and audits, in pursuit of our and your legitimate interests in complying with audits and managing tax liability.
<u>Health & Safety</u> We use this information to assess fitness to work, carry out desk audits, assess needs and reasonable adjustments, to ensure the health and safety of our personnel and applicants, and to record accidents at work. We may also use Key Contact Data to communicate with a designated third party in the event of a medical emergency, disaster or similar.	To meet our legal obligations, to perform our contractual obligations, and to pursue our and your mutual interests in ensuring health and safety in the workplace.

<u>Crime & Fraud</u> We use this information to detect and prevent fraud and other crime.	To meet our legal obligations, and pursue our legitimate interest in detecting and preventing crime, and harm to our property or personnel.
<u>Monitoring & Security</u> We use this data to keep track of attendance, monitor use of information & communication systems, to monitor compliance with our IT policies, and to ensure network & information security (including detecting, and preventing unauthorised access to computer & electronic communications systems, and preventing the distribution of malicious software).	We process personal data for this purpose to: (i) pursue our legitimate interests in monitoring compliance with terms of employment (or engagement) and policies and procedures, identifying breaches of the foregoing, and preventing and detecting unauthorised use of or access to our systems; (ii) and to comply with our legal obligations.

4. HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

We only process sensitive "special category" personal data where appropriate given the nature of the data and processing, and where we are legally able to do so.

Special category data includes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Processing of special category data must meet certain criteria under the UK GDPR and GDPR. Restrictions also apply to criminal offence data. We may process special categories of personal data and information about criminal offences, where criteria apply as set out in the table below.

Criteria	Processing
Article 9(2)(a): Explicit consent	We may ask for consent to process special category data from time to time, such as if we ask about staff dietary requirements, seek information as part of diversity and equality monitoring, or if special category data is recorded as part of a production. Where you are included in and identifiable from a video/photograph used for promotional and production purposes, if that entails sharing/processing of information about your health, racial or ethnic origin, or similar, we will let you know in advance and seek your consent, so you can object if you are not comfortable with such use of material.

Article 9(2)(b): where processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us or you in connection with employment, social security or social protection	Examples of our processing include monitoring sickness leave, paternity/maternity absences, or to make reasonable adjustments, ensure your health and safety in the workplace, and assess your fitness to work.
Article 9(2)(c): Where processing is necessary to protect the vital interests of the data subject or of another natural person	Examples of our processing include using health information about staff in a medical emergency.
Article 9(2)(f): for the establishment, exercise or defence of legal claims	Examples include processing relating to any employment tribunal or other litigation.
We may process criminal offence data under Article 10 of the GDPR	We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Examples may include pre-employment checks and/or declarations by employees.

5. STORAGE, TRANSFERS AND DISCLOSURE

Data retention	Where explicit retention periods are not described above, we hold personal data described in this policy for as long as it is necessary to continue to retain that personal data to achieve the relevant purposes (taking into account the amount, nature, and sensitivity of the personal data, the potential risk of unauthorised access, and legal requirements).
Storage and transfers	Your personal data is normally securely stored in the UK, European Economic Area or in the country where you are based. We use technical and organisational measures to protect personal data against accidental, unauthorised or unlawful destruction, loss, alteration, disclosure or access. Where we transfer personal data internationally, we will implement appropriate measures (where required by data protection laws) in order to safeguard such transfers. For more information please reach out to us using the contact details at the start of this notice.
Disclosure	We may disclose your personal data: • Where required by law, government, regulators and other competent authorities or the courts or to establish, exercise or defend our legal rights, and for the purposes of preventing crime and fraud (for example, we may share personal data with our professional advisors, investigators, or credit reference agencies). • Your personal data is shared with the relevant tax authorities in order for us to comply with our legal obligations.

	• Promotional photographs, video and audio recordings, and your professional bio may be shared through our website, social media, brochures and other promotional channels. • To broadcasters, distributors and financiers where your personal data is incorporated into a production. • To your colleagues, our HR, IT and other departments, members of our corporate group, insurers, bankers, auditors, and legal advisers. • With our service providers and subcontractors, provided they use that personal data on our instructions and not for their own independent purposes. Please refer to the box below ("Suppliers") for detail. • If involved in an investment, merger, acquisition, or sale of our organisation or assets, data we hold may be shared on the basis of legitimate interests of us, shareholders, customers and other parties to a transaction if not outweighed by prejudicial impact upon you.
Suppliers	Suppliers who may receive your personal data for the reasons set out in this policy include the following: • We may use recruiters to identify candidates for open positions. • We use third party suppliers to administer payroll, IT support, travel booking, DSE assessments, insurance and training courses. • We use a range of other suppliers to provide our business infrastructure, including email service providers, web hosts, IT support consultants, CCTV operators, and suppliers of security technology (e.g. swipe-card access systems). For further information get in touch using the contact details at the start of this policy.