

# **Privacy Notice**

## **Job Applicants**

### **What is the purpose of this notice?**

We are sending you this notice because you are applying for work with IWC Media Limited (IWC) or are otherwise being considered for a role (whether as an employee, worker or contractor). During this process IWC will hold data about you and will be a "data controller" for the purposes of the General Data Protection Regulation (GDPR). In the event that you have data concerns you should address them, in the first instance, to our Legal and Business Affairs department who can be reached at our Glasgow Office on 0141 353 3222.

This note will make you aware of how and why your personal data will be used and how long it will usually be retained.

### **What personal data does the Company collect?**

We have put together a table in the Appendix that shows the variety of ways that we may collect and use your personal information depending on the nature of your interaction with us.

### **What is the legal basis for retaining and processing this data?**

Our business needs to appoint people of appropriate competence and skills for the role and therefore it is in our legitimate interests to obtain information about you. We also need to process your personal information to decide whether to enter into a contract with you.

We may collect, retain and hold your information where you have a) given us direct permission to do so; b) where we are fulfilling the terms of an agreement with you; c) where the law requires us to do so; d) where it is necessary in our legitimate interests; and/or e) where there is substantial public and commercial interest.

### **Where will this information be held?**

This information may be held securely at our offices and/or by service providers from time to time. It may also be uploaded to our secure internal computer and email systems and accessed by our staff and freelancers. We may also have to share your information with our professional advisors and/or production partners. On occasion it may be necessary to transfer information outside the European Economic Area (EEA) in order to further our business interests and, where we do this, we shall ensure that we have protected this information contractually or otherwise have a lawful basis for doing so.

## **How long will we keep your information for?**

We will retain the personal information you provide to us in connection with your application for a period of three years after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If your application is unsuccessful we may ask for your consent to add your name, job title and contact details to a talent database so we can contact you if future positions become available. We will maintain your information on our talent database up to a maximum period of six years after which we may contact you for further consent or remove you from this database.

If you are employed by us we will keep the recruitment information relevant to your employment this could include your CV, any covering letter and any references provided along with your name, address, email and other relevant personal details for as long as is necessary. We would not expect to retain your personal data for longer than six years after the termination of your employment.

## **What happens to data which is particularly personal to me?**

Some special categories of personal data, such as information about health or medical conditions, may be provided to cast and/or film programmes or be provided in the recruitment process (such as those in relation to contributors with disabilities and for health and safety purposes).

Where we process other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, we will only do so to the extent permitted by law. To the extent possible, data that we use for these purposes will be anonymised or collected with your express consent (and such consent can be withdrawn at any time).

If we collect information of this type we will ensure that it is processed lawfully, fairly and in a transparent manner and collected for a specific purpose. We will endeavour to keep such information up to date and to not hold it for longer than necessary. At any point you may request that such data is erased or amended to the extent permitted by law.

Given the sensitivity of the data we will also take steps to protect the data against accidental loss, destruction or damage.

## **Your data rights**

If you have any questions about the way we use your data, you should in the first instance address your concerns to the legal and business affairs team on 0141 353 3222 or write to our Glasgow office. It might be that there are steps we can take to explain or amend our processes.

You also have a qualified right under UK law to request: (i) access to your personal data; (ii) the correction or deletion of certain personal data; (iii) that we restrict the processing of data concerning you or; (iv) transfer certain data to other organisations.

We may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Please also note that, if we have requested that you consent to the processing of your personal data you may withdraw this consent at any time by providing notice to us.

### **How does the Company protect data?**

The Company takes the security of your data seriously. The Company has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

Where the Company engages third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

### **How to complain**

If you have any queries or concerns about this notice or about our use of your personal information please contact our legal and business affairs department on 0141 353 3222 or write to our Glasgow office.

If our legal and business affairs department is not available to address your query then you can contact the Information Commissioner at <https://ico.org.uk/concerns> or telephone 0303 123 1113 for further information about your rights and how to make a formal complaint.

## **Appendix**

### **The information we may collect, how we collect it and how we use it**

The information we collect	How we collect it	Why we collect it and how we use it
Your name and contact details	From you	To carry out a fair recruitment process and to process your application and keep you informed.  To inform the relevant manager or department of your application.
Details of your experience, qualifications and employment history including salary, working hours and interests	From you and from the information you provide to us (including information in your CV or application)	To carry out a fair recruitment process and to make an informed decision about recruitment.
Details of references	From you and from any third parties you authorise us to	To carry out a fair recruitment process and to

	contact	<p>make an informed decision.</p> <p>To comply with regulatory obligations and those of the commissioning broadcaster.</p> <p>Information may be shared with the relevant managers, HR personnel, the referee and programme commissioner.</p>
Information about any conduct, grievance or performance issue obtained from previous employers and/or education providers (required by law or to enter into a contract of employment)	From you, your education provider, previous employers and/or referees	<p>To carry out a fair recruitment process and to make an informed decision.</p> <p>To maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice.</p>
Information regarding your professional qualifications	From you, your education provider and any relevant professional body	<p>To verify the information provided by you.</p> <p>To make an informed recruitment decision.</p>
Information regarding criminal records (required by law or in order to enter into contracts)	From you, from Disclosure Scotland (or equivalent) and/or the Disclosure and Barring Service	<p>To verify information provided by you.</p> <p>To comply with our legal obligations.</p> <p>To progress a contract of employment.</p>
Your nationality and immigration status and information from related documents such as your passport and other identification and immigration information (required by law in order to enter into contract)	From you, and where necessary, the Home Office	<p>To progress a contract of employment.</p> <p>To carry out right to work checks.</p> <p>To maintain accurate employment records.</p> <p>Information may be shared with the Home Office to the extent permitted by law.</p>
A copy of your driving licence (required by law, for insurance purposes or to enter into a contract)	From you	<p>To progress a contract of employment.</p> <p>To comply with the terms of</p>

		<p>our insurance.</p> <p>Information may be shared with our insurer or as otherwise required by law.</p>
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