

INTRODUCTION

Welcome to the Offspring Films's privacy policy.

Offspring Films Ltd respects your privacy and is committed to protecting your personal data. This privacy policy will inform you about how we look after your personal data when you visit our website (or send us a CV or an email) and tells you about your privacy rights and how the law protects you.

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of the Privacy Policy

This privacy policy aims to give you information on how Offspring Films Ltd collects and processes your personal data through your use of this website; including any data you may provide through this website when you send an email, make an enquiry or send a job application or CV to us.

It is important that you read this privacy policy together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

Controller

Offspring Films Ltd is made up of different legal entities, Offspring Films Ltd and its subsidiaries. This privacy policy is issued on behalf of all the Offspring Films Ltd entities so when we mention "COMPANY", "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Offspring Films Ltd group responsible for processing your data. Offspring Films Ltd is the controller and responsible for this website.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights in relation to data, please contact the data privacy manager using the details set out below.

Contact Details

Full name of legal entity: *Offspring Films Limited*

Name or title of data privacy manager: *Zoe Brandon*

Email address: zoe@offspringfilms.com

Postal address: *48 Welsh Back, Bristol, BS1 4SB*

Telephone number: *0117 332 8400*

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk), though please contact us first to see if your query can be resolved.

Changes to the Privacy Policy and your duty to inform us of changes

This version was last updated on 13th June 2024

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-Party Links

This website may include links to third-party websites. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and/ or transfer different kinds of personal data about you as below:

- **Identity Data.** This includes first name, last name, maiden name, title, date of birth and gender, or any other identification that you may send to us (for example a photo or moving image).
- **Contact Data.** This includes email address, postal addresses and telephone numbers.

Unless notified to you separately (and subject to your right to give explicit consent where applicable), we do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for a job with us;
 - wish to give us information about services you can provide;
 - request information about one of our productions;
 - respond to an email from us; or
 - give us some feedback or respond to communications.

- **Automated technologies or interactions.** As you interact with our website, we may automatically collect some Technical Data about your browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Identity and Contact Data from publicly available sources such as Companies House, or LinkedIn, or other equivalent on-line organisations based inside the EU.
 - Employer or third party referees.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform a service or contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) such as keeping or maintaining accurate records of job applicants, and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data. Where we require your consent as a legal basis for processing your personal data and you have not already given your informed consent, we will usually ask you to sign a separate notice or letter setting out the grounds for such processing. Unless we have another legitimate reason to process your data, you are entitled to withdraw your consent at any time by emailing us at info@offspringfilms.com.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, when, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/ Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To manage our relationship with you which may include: 1) Asking you to provide us with	1) Identity 2) Contact	1) Performance of a contract with you (including prior negotiations for the purposes of a contract)

<p>further information about you or your or your company's products or services or contract terms</p> <p>2) Providing you with further information about us, our services and productions or contract terms</p> <p>3) Notifying you about changes to our terms or privacy policy</p>	<p>3) Profile</p>	<p>2) Necessary to comply with a legal obligation</p> <p>3) Necessary for our legitimate interests (to keep our records updated)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>1) Identity</p> <p>2) Contact</p> <p>3) Technical</p>	<p>1) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>2) Necessary to comply with a legal obligation.</p>

THIRD-PARTY TRANSFER

We will get your express opt-in consent before we share your personal data with any company outside the Offspring Films group of companies for marketing purposes.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Other group companies for the purposes of negotiating, entering into or performing a contract to which you are a party
- Service providers acting as processors who provide payroll, IT and system administration services.
- Professional advisers acting as processors or joint controllers including bankers, lawyers, insurers and auditors who provide banking, consultancy, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Whenever we transfer your personal data out of the EEA, we endeavour to ensure a similar degree of protection is afforded to it by the implementation of one of the following or if necessary for the performance of a contract between us:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contract clauses approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third

parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only 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, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see **Request erasure** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to **object to processing** (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights

and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact Zoe Brandon, our data privacy manager.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. DEFINITIONS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests.

We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us: info@offspringfilms.com.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps in response to your enquiry or questions or at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.