

Active Pictures Film and Television Limited Privacy Policy

Active Pictures Film and Television Ltd ('Active Pictures') is a television commercial production company based in the United Kingdom that makes and reverts adverts and other content for broadcast globally.

Our registered office is at One Embankment, Neville Street Leeds, LS1 4DW.

Active Pictures is committed to protecting the privacy of others and complying with all relevant data protection laws and regulations. This Privacy Policy sets out how Active Pictures will collect and use the personal information of all individuals who contact us, or feature, whether directly or indirectly, in any content made by us (the "**Content**") as well as anyone who visits our website.

The type of personal information we collect and why

We may process a wide range of personal information about you in connection with our Content and this data may include the following information:

1. your name, your gender, your age and date of birth, your address and contact details such as your email address and telephone number, your handwriting, as well as other basic details about you. We need this information to correspond with you and to contract with you and for administrative and other purposes.
2. your image, your gender, your age and birth date, information contained within your passport, your driving licence and possibly other official documents which identify you. We need this information to check your identity and to ensure compliance with relevant laws and regulations.
3. information about your past and present professional life including information about your current role and work schedule, your previous work history, your qualifications and your experiences. We need this information for administrative purposes, to be able to assess your suitability to take part in our Content and to comply with our contractual and regulatory obligations.
4. financial information including any payment and bank account details for administrative purposes.
5. any and all personal information collated by us for research purposes in connection with our Content or revealed or recorded on cameras and/or microphones and contained within footage and/or sound recordings made for our Content (or provided by a third party to us in connection with our Content) including your image and voice and potentially a very wide range of personal information relating to you revealed by you and/or others including without

Date: 13/03/24

limitation: your name; your gender; your age and date of birth; your address and contact details; information concerning your racial and ethnic origin, political opinions, religious or philosophical beliefs, your membership of a trade union, your health and any medical treatment you receive, your sex life or your sexual orientation (“special category data”).

We need this information for the production of our Content, for contractual reasons and obligations we have to third parties, and/or to comply with our obligations to you pursuant to our contract with you.

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- by phone
- by email
- by post
- through social media
- face to face for example during meetings

Lawful bases for processing the above information

The first column of the following table refers to the types of personal information set out in the numbered paragraphs above. The second column lists the lawful bases we rely upon in order to process these types of personal information for the purposes noted in those paragraphs.

Para	Lawful Basis
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1	<p>Processing is:</p> <ul style="list-style-type: none"> • necessary for the purposes of our legitimate interests and others e.g. those that publish the Content we produce; and/or • Necessary for the performance of our contract with you or in order to take steps prior to entering into the contract; and/or • undertaken with your explicit consent.
2	<p>Processing is:</p> <ul style="list-style-type: none"> • necessary for the purposes of our legitimate interests and others e.g. those that publish the Content we produce; and/or • necessary for the performance of our contract with you or in order to take steps prior to entering into the contract; and/or • undertaken with your explicit consent.
3	<p>Processing is:</p> <ul style="list-style-type: none"> • necessary for the purposes of our legitimate interests and others e.g. those that publish the Content we produce; and/or • necessary for the performance of our contract with you or in order to take steps prior to entering into the contract; and/or • undertaken with your explicit consent.
4	<p>Processing is:</p> <ul style="list-style-type: none"> • necessary for the purposes of our legitimate interests and others e.g. those that publish the Content we produce; and/or • necessary for the performance of our contract with you or in order to take steps prior to entering into the contract; and/or • undertaken with your explicit consent.

5	<p>Processing is:</p> <ul style="list-style-type: none">• necessary for the purposes of our legitimate interests and others e.g. those that publish the Content we produce; and/or• necessary for the performance of our contract with you or in order to take steps prior to entering into the contract; and/or• undertaken with your explicit consent;• In addition, following exploitation of our Content, such information contained within the Content may be information manifestly made public by you and if so we will rely on the relevant provisions of the DPA 2018 for any further processing of that information.
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Legitimate Interests

Where we rely on 'legitimate interests' as the lawful basis for processing data, such legitimate interests include our legitimate interests in ensuring that we can contact our clients, and ensuring that those who feature in our Content or work with us are suitable to take part in our Content; or to assist with developing, producing and exploiting our Content for potentially worldwide distribution; and ensuring that our Content complies with all relevant standards, regulations and laws.

We only process data on this legal basis where we have considered that the processing is necessary to achieve our legitimate interest and, on balance, our legitimate interests are not overridden by your interests, fundamental rights or freedoms.

Consent

Giving your informed consent to take part in our Content, and our reliance on your consent to process your personal data are two different things. We will not generally rely on your consent to process your personal data but rather will process data for our legitimate business interests or for contractual purposes, as noted above in the table.

Where we do rely upon 'consent' to process your personal information, you have the right to withdraw your consent at any time, although please note that we may be relying on other lawful bases at the same time.

Sharing your personal information

Your personal information is processed by our employees and staff. In addition, we use third parties who are contractually engaged to provide services to us which may involve the sharing of your personal information e.g. IT services, legal and accountancy services. Some of your personal information is likely to be shared with our partners e.g. broadcasters.

We may also need to share your personal information with other organisations from time to time including with:

- companies involved with our business activities e.g. our licensees, third party suppliers, post-production houses, sales agents, distributors;
- any regulatory bodies as required by law.

If you feature in our Content or if you work with us, your personal data will be shared with audiences when our Content is exploited, and on our website and showreel.

Although we are based in the UK, our business is global and so we may need to transfer your personal information outside the UK. Whenever your information is transferred to organisations outside the UK, we will ensure that adequacy regulations or appropriate safeguards, such as standard data protection clauses recognised or issued in accordance with the UK data protection regime, are in place to ensure the safety and security of your personal information and that it is processed in accordance with this Privacy Policy (unless an exemption applies). You can find out more about these safeguards by contacting us using the contact details below.

How we store your personal information

We have implemented appropriate measures to ensure that your personal information is kept safe and secure e.g. by storing it securely, and by keeping electronic data on secure servers and hard drives with appropriate levels of security including encryption and firewalls.

We will only keep your personal information for as long as we need to for the purposes set out in this policy. For those engaging us to produce content and those featuring in our content, we are likely to retain your personal information for as long as is necessary in order to produce, exhibit, exploit, distribute, advertise, publicise and promote our content in accordance with our legitimate interests and legal obligations.

Personal information that is no longer required will be deleted and/or destroyed. If you have provided your personal data to us, we will retain it for as long as necessary in order to address the purpose for which the data was processed, unless you request that data is deleted, in which case we will consider your request.

Your data protection rights

You have a number of rights under data protection law in respect of your personal information, , these rights include:

Your right of access – You have the right to ask us for copies of the personal information that we hold about you.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information.

Your right to object to processing - You have the the right to object to the processing of your personal information.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.

Please note that most of these rights are not absolute and are limited to certain defined circumstances. Accordingly, we may not be able to comply with any such request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us, please contact us at info@activepictures.co.uk with the relevant information so we can look in to your request. We might ask for your guidance in identifying yourself or the issue. Please be clear and specific with any information that you give us.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

[We may update or amend this Privacy Notice from time to time.](#)