

## **Chatterbox Media Privacy Notice**

### **Overview**

Chatterbox Media take our obligations under the General Data Protection Regulation (2018) very seriously and are committed to protecting the privacy of our data subjects.

Chatterbox Media are the data controller of the personal data we collect from and about you.

The privacy policy is split into section

- 1) Information for Website Users
- 2) Information for Employees and Contracted Suppliers
- 3) Information for Job Applicants
- 4) Information for All Users

For any questions on this policy please email [wiki@chatterbox.media](mailto:wiki@chatterbox.media)

### **Introduction for Website Users**

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be stored, protected and processed by us.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it. By using our Site you consent to the collection, storage, processing, use and transfer of your personal data under the terms of this privacy policy.

### **Website Users- Personal Data That We Collect**

We may collect, store, process and transfer the following data about you:

- information that you provide by filling in forms on our websites chatterbox.media (our “**Site**”). This includes information provided at the time of registering to use our Site, subscribing to our service, posting material or requesting further services.
- if you contact us, we may keep a record of that correspondence;
- details of transactions you carry out through our Site and of the fulfilment of your orders;
- details of your visits to our Site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

### **Website Users- Cookies**

By using cookies (i.e a cookie file which is stored on the hard drive of your computer or mobile phone), we may obtain information about your general internet usage.

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

Cookies contain information that is transferred to your computer's hard drive. They help us to improve our Site and to deliver a better and more personalised service. They enable us to:

- estimate our audience size and usage pattern;
- store information about your preferences, and so allow us to customise our Site according to your individual interests;
- speed up your searches
- recognise you when you return to our Site.
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We do not use cookies to collect your personal information (unless we have your permission), to pass your personal information to advertising networks or to pass your personal information to other third parties.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our Site.

Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our Site.

### **Website Users- Security**

Unfortunately, the transmission of information via the internet is not completely secure.

Accordingly, we cannot guarantee the security of your personal data transmitted to our Site; any transmission is at your own risk.

Once we have received your information, we will use appropriate procedures and security features in accordance with the General Data Protection Regulation (2018) to try to prevent unauthorised access.

Our Site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **Website Users- How We Will Use Your Personal Information**

We use information held about you in the following ways:

- to ensure that content from our Site is presented in the most effective manner for you and for your computer;
- to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- to carry out our obligations arising from any contracts entered into between you and us;
- to allow you to participate in interactive features of our service, when you choose to do so;
- to notify you about changes to our service.

We may use your data, or permit selected GDPR compliant third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these.

We will have requested and obtained your consent to contact you at the time of our initial engagement. You can exercise your right to prevent such processing by leaving certain boxes on the forms we use to collect your data at the time of our initial engagement unchecked. You can also exercise the right to withdraw your consent at any time by contacting us at Chatterbox Media, 62 Queens Road, Brighton, BN1 3XD or emailing [ali@chatterbox.media](mailto:ali@chatterbox.media)

**Please refer to the “All Users” Section in relation to Transferring Information Abroad, Your Rights, Retention Periods, and Your Obligations.**

### **Introduction for Employees and Contracted Suppliers**

#### **This section of the Privacy Notice applies to:**

- a) any employee, subject to any type of (employment) agreement, including any internship or apprenticeship contract, training programme, access-to-work contract, on-call contract, and, when necessary (for example in emergency situations and for benefits administration), to such employee’s spouse, domestic/civil partner or dependents (together dependents);
- b) self-employed workers and independent contractors and freelancers;
- c) any other individual performing a work activity or professional performance for the benefit of the Company.

(the above listed individuals are collectively defined as you and the relevant agreement with the Company, whatever form it takes as described under a), b) and c) above, is also defined as the working relationship).

### **What Personal Data Do We Collect?**

Before entering into a working relationship or in the course of the working relationship with the Company, the Company will collect data or may have data collected about you. We refer to such information as personal data which includes, for example, the following:

**Personal Details:** name, employee identification number, work and home contact details (email, phone numbers, physical address), language(s) spoken, gender, date and place of birth, national insurance number, driving licence information, marital/civil partnership status, domestic partners, dependents, emergency contact information and photographs, employment status (eg active, inactive, maternity replacement).

**Documentation Required under Immigration Laws:** Citizenship, passport data, details of residency or any work permit.

**Compensation and Payroll:** Base salary, bonus, benefits, compensation type, details on share options, share grants and other awards, currency, pay frequency, effective date of current compensation, salary reviews, banking details, working time records (including holiday and other absence records, leave status, hours worked), pay data and life insurance beneficiaries.

**Position:** Description of positions, job title, management category, job code, salary plan, pay grade or level, job function(s) and sub function(s), details of any directorships, company name and code (legal employer entity), branch/unit/department, location, employment status and type, full-time/part-time, terms of employment, employment contract, work history, hire/re-hire and termination date(s) and reason, length of service, business travel details, retirement eligibility, promotions and disciplinary records, date of transfers, and line manager(s) information.

**Talent Management Information:** Details contained in letters of application and resume/CV (e.g., previous employment background, education history, professional qualifications, language and other relevant skills, certification, certification expiration dates), development programmes planned and attended, e-learning programmes, performance and development reviews, willingness to relocate and information used to populate employee biographies.

**Management Records:** Details of any shares or share options.

**System and Application Access Data:** Information required to access company systems and applications such as active directory, email address, employee ID, other system and application user IDs and passwords, electronic content produced using company systems, building access information from any access control card system, office premises CCTV footage, access to documents and other materials, as well as incident response data (to the extent permitted by local legislation and Company policy).

**Special Category Data:** We may also process special categories of data, when permitted by local law. Such data include criminal background checks (if authorised under local laws), health/medical information or disability status, trade union membership information, religion, race or ethnicity when necessary. We collect this information for specific purposes, such as health/medical information to accommodate a disability or illness and to provide benefits; and diversity-related personal data (such as gender, race or ethnicity) to comply with legal obligations and internal policies relating to diversity and anti-discrimination. We will only use such sensitive information for the purposes as described below and as provided and permitted by law.

### **How Do We Use Your Personal Data?**

We will process your personal data in compliance with applicable laws for the following purposes:

- a) Managing Workforce:** HR administration and managing work activities and personnel generally, including recruitment, absence, performance management, promotions and succession planning, rehiring, salary and payment administration, pension and benefits administration, managing business expenses and reimbursements, planning and monitoring of training requirements and career development activities and skills
- b) Communications and Emergencies:** facilitating communication with you, ensuring business continuity, protecting the health and safety of employees and others.
- c) Business Operations and security:** operating and managing IT and communications systems, managing product and service development and improvement, managing and allocating company assets and human resources, strategic planning, project management, business continuity, compilation of audit trails and other reporting tools, maintaining records relating to business activities, budgeting, financial management and reporting, communications, managing mergers, acquisitions, sales, re-organizations or disposals and integrations, building security and crime prevention.
- d) Compliance:** Complying with legal and other requirements, including audits, inspections and other requests from government or other public authorities.
- e) Dispute resolution,** responding to legal process such as subpoenas, pursuing legal rights and remedies.
- f) Health and safety:** Complying with legal obligations on occupational safety and health. (defined together as the Contractual Purposes).
- g) Intranet:** Publishing details of the employee including the photograph on the Company's intranets, (the Intranet Purposes);
- h) Corporate and commercial matters:** if the Company is involved in a merger or transfer of all or a material part of its business, the Company may transfer your information to the party or parties involved in the transaction (the Other Purposes);

### **Legal Basis for Processing Your Personal Data?**

We process your personal data to perform the obligations under the contract with you, to comply with legal obligations arising in the context of your contract, as well as to pursue the legitimate interests of the Company.

The processing of your personal data for Contractual Purposes is mandatory as the refusal to provide the personal data would make it impossible to sign and perform the contract between you and the Company.

The processing of your personal data for Intranet Purposes and Other Purposes, are carried out in compliance with the legitimate interest of the Company which adequately balances the interests of the Company and you. That processing is not mandatory, and, for this reason, you may oppose the processing as described in this Privacy Notice. If you object to this data processing, data will not be processed for the legitimate interest purposes, but we will continue to process any relevant data on another legal basis as appropriate.

### **How Do We Process Your Personal Data?**

We process your personal data through both electronic and manual means and it is protected by reasonable security measures. We will take appropriate administrative, technical, personnel and physical measures designed to protect personal data that are consistent with applicable privacy and data security laws and regulations that include protecting personal data from misuse or accidental, unlawful or unauthorised destruction, loss, alteration, disclosure, acquisition or access. This includes requiring service providers to use appropriate measures to protect the confidentiality and security of personal data.

### **Who Can Access Your Personal Data?**

All personnel within Chatterbox Media will generally have access to your business contact information such as name, position, telephone number, business postal address and email address.

We may share your personal data for the purposes specified in this Privacy Notice with the following categories of entities that can be located within and, in compliance with the below, outside the European Union as follows:

**a) Other entities in the Chatterbox Media Group:** which need access to your personal data in order to manage services and activities coordinated at the group level.

**b) Professional Advisors:** Accountants, auditors, lawyers, insurers, bankers, and other professional advisors in all of the countries in which Chatterbox Media operates.

**c) Service Providers and Clients:** Companies that provide products and services to the Company such as payroll, pension scheme, benefits, human resources, performance management, training, expense management, IT systems supply and support, assistance with equity compensation programmes, credit cards, medical or health services, trade bodies and associations services, travel services and others. Companies which the Company provide products or services to such as broadcasters.

**d) Public, Judicial, Governmental Authorities and Litigants:** Entities that regulate or have jurisdiction over the Company such as regulatory authorities, law enforcement, public bodies and judicial bodies or other third parties in connection with judicial or regulatory proceedings.

**e) Other Purposes:** A third party in connection with any proposed or actual reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the Company's business, assets or stock (including in connection with any bankruptcy or similar proceedings).

Access to personal data within the Company will be limited to those who have the "need to know" for the purposes described in this Privacy Notice, and may include your managers and their designees, personnel in HR, IT, Compliance, Legal, Finance and Accounting and Internal Audit.

**Please refer to the "All Users" Section in relation to Transferring Information Abroad, Your Rights, Retention Period, and Your Obligations.**

### **Information for Job Applicants**

This Privacy Notice sets out how we will use your personal information when you send us your CV or apply for work with any of our companies. We are responsible for deciding how we hold and use this personal information about you. This Privacy Notice sets out how and why your personal information will be used in your application for work with us and how long it will usually be retained for.

### **What We Collect and Hold?**

In connection with your application for work with us we will collect, store, and use the following categories of personal information about you:

- The information you have included in your CV and any covering letter.
- The information you have provided on any application form, including name, title, address, telephone number, personal email address, age, gender, employment history & qualifications
- Any information you provide to us during an interview.
- Any information we obtain from third party recruitment platforms
- Any information we obtain from checking your social-media profiles

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about any disability you may have, your race or ethnicity, religious beliefs and sexual orientation for equal opportunity monitoring.
- Information about any disability you may have in order to make our recruitment process more accessible to you

### **How We Collect It?**

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies from which we collect information about your work history, your availability, your current salary, your salary expectations and your career aspirations.
- Your named referees, from whom we collect information about the dates, nature and relevant other detail of your work history

- Your publicly accessible social media profiles (e.g. Facebook, Twitter, Youtube, Instagram and Snapchat)
- Recruitment platforms such as Talentbases, Talent Manager and LinkedIn from which we may collect your CV and information about your availability and career aspirations. Please note any information you provide to those platforms is subject to their Privacy Notices which we would encourage you to read and make yourselves aware of.

### **How We Use Information We Collect?**

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for available work.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

If we do interview you and after interview decide to offer you work, we may then take up references and/or carry out any required check following confirmation of your appointment.

We will use your special category / sensitive personal information in the following ways:

- information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during interview
- information about any disability you may have, your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting
- We do not envisage that we will usually process information about your criminal convictions as part of the recruitment process unless we are required to carry out those checks for a particular role by law or as required by a broadcaster or if the role requires a high degree of trust and integrity. We will inform you in advance at the time if we need to carry out any criminal record or other required checks and the legal basis for those checks.

We may share your personal information with broadcasters and other commissioners of the content and programmes we produce, our insurers, our professional advisers and our company.

### **Legal Basis For Using Your Information**

Our legal basis for collecting and using personal information about you is that it is necessary to decide whether to enter into a contract of engagement for your services, to comply with our legal and regulatory obligations and to pursue our legitimate business interests in seeking suitable candidates for available work.

We also rely on your consent to collect and use information about any disability you may have (used to make our recruitment process more accessible to you and for equal opportunity monitoring) or information about your race or ethnicity, religious beliefs and sexual orientation (used for equal opportunity monitoring). Please note you have the right to withdraw your consent to the use of that personal information by contacting us [viki@chatterbox.media](mailto:viki@chatterbox.media).



**Please refer to the “All Users” Section in relation to Transferring Information Abroad, Your Rights, Retention Period, and Your Obligations.**

### **Information for All Users**

This section covers information relevant to All Users and should be read in conjunction with the “Website Users” or “Employees and Contracted Suppliers” or “Job Applicant” sections as required.

### **Transferring Information Abroad?**

Due to the global nature of Chatterbox Media operations, the Company may disclose personal data to personnel and departments (and to some third parties providing services as described above and the Company’s pension services provider) to fulfil the purposes described in this Privacy Notice. This may include transferring personal data to other countries (including countries other than where you are based that have a different data protection regime than the one existing in the country where you are based). If you are in the European Economic Area (EEA), this may include countries outside of the EEA. We have adopted appropriate safeguards to protect your personal data regardless of where it resides. You can find the list of member states by clicking on the following link: [https://europa.eu/european-union/about-eu/countries/member-countries\\_en](https://europa.eu/european-union/about-eu/countries/member-countries_en).

### **Your Rights?**

You have the right to:

- a) Obtain confirmation as to whether or not your personal data exists and to be informed of its content and source, verify its accuracy and request its rectification, update or amendment.
- b) Request the deletion, anonymisation or restriction of the processing of your personal data processed in breach of the applicable law.
- c) Object to or request the limiting of the processing, in all cases, of your personal data for legitimate reasons.
- d) Receive an electronic copy of your personal data, if you would like to port the personal data, which you have provided to us, to yourself or to a different provider (data portability), when the personal data is processed by automatic means and the processing is either (i) based upon your consent or (ii) necessary for the provision of the company service; and
- e) Lodge a complaint with the relevant data protection regulatory authority.

You may send your request to [wiki@chatterbox.media](mailto:wiki@chatterbox.media)

Please note, however, that certain personal data may be exempt from such access, correction and deletion requests pursuant to applicable data protection laws or other laws and regulations.

### **Retention period applying to your personal data**

The personal data collected pursuant to this Privacy Notice is retained for the duration of the working relationship and, after the termination of the working relationship up to seven (7) years, except for longer periods where the retention of the personal data is necessary due to litigation, requests filed by

competent authorities or in compliance with applicable laws and regulations. In any case, we will take steps to ensure that the personal data processed is relevant and not excessive for its intended use and is accurate and complete for carrying out the purposes described in this Privacy Notice. Accordingly, we will retain personal data for the period necessary to fulfil the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law. After the applicable retention period has ended, the Company shall securely destroy or delete the personal data or anonymise it.

### **Your Obligations?**

Please keep personal data up to date and inform us of any significant changes to personal data. You agree to inform your dependents, whose personal data you provide to the Company, about the content of this Privacy Notice, and to obtain their consent (provided they are legally competent to give consent) for the processing of that personal data by the Company as set out in this Privacy Notice.

You further agree to follow applicable law and both Chatterbox Media policies, standards and procedures that are brought to your attention when handling any personal data to which you have access during your relationship with the Company, in particular the Chatterbox Media Data Protection Policy. You will not access or use any personal data for any purpose other than in connection with and to the extent necessary for your relationship with the Company. You understand that these obligations continue to exist after termination of your relationship with the Company.

### **Changes to the Privacy Notice**

We may change or update this Privacy Notice due to different interpretations, decisions and opinions relating to the EU Privacy Regulation and will notify you accordingly.