



DATA PROTECTION POLICY

Updated October 2022

1. Introduction

This Policy applies to all employees, freelancers and workers (whether full time, part time, permanent or casual) of all companies within the the Playground Television Group (each company to be referred to as the “Company”)

For the purposes of this definition “the Playground Television Group” means Playground Television UK Limited and Playground Television UK 2 Limited (in each case referred to as the “Parent Company”) and each of its subsidiary undertakings from time to time, including without limitation all production service vehicles established by the Parent Company

It may also apply to employees, freelancers and workers of co-production partners of Playground, upon giving written notice to such persons.

This Policy sets out the obligations of each Company regarding data protection and the rights of on screen and off-screen workers, filmed contributors, customers, business contacts and all other individuals with whom the Company conducts its business (“data subjects”) in respect of their personal data under the Data Protection Law. “Data Protection Law” means all legislation and regulations in force from time to time regulating the use of personal data and the privacy of electronic communications including, but not limited to, the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (the “UK GDPR”), as it forms part of the law of England and Wales, Scotland, and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 as amended, and any successor legislation.

The Data Protection Law defines “personal data” as any information relating to an identified or identifiable natural person (a “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

This Policy sets out the Company’s obligations regarding the collection, processing, transfer, storage, and disposal of personal data. The procedures and principles set out herein must be followed at all times by the Company, its employees, agents, contractors, or other parties working on behalf of the Company.

The Company is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

2. The Data Protection Principles

This Policy aims to ensure compliance with the Data Protection Law. The Data Protection Law sets out the following principles with which any party handling personal data must comply. Data controllers are responsible for, and must be able to demonstrate, such compliance. All personal data must be:

- 2.1 Processed lawfully, fairly, and in a transparent manner in relation to the data subject.
- 2.2 Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical

research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

- 2.3 Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- 2.4 Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay.
- 2.5 Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the UK GDPR in order to safeguard the rights and freedoms of the data subject.
- 2.6 Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

3. **The Rights of Data Subjects**

The UK GDPR sets out the following key rights applicable to data subjects (please refer to the parts of this policy indicated for further details):

- 3.1 The right to be informed (Part 12).
- 3.2 The right of access (Part 13);
- 3.3 The right to rectification (Part 14);
- 3.4 The right to erasure (also known as the 'right to be forgotten') (Part 15);
- 3.5 The right to restrict processing (Part 16);
- 3.6 The right to object (Part 17); and

4. **Lawful, Fair, and Transparent Data Processing**

- 4.1 The Data Protection Law seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. Specifically, the processing of personal data shall be lawful if at least one of the following applies:
 - 4.1.1 The data subject has given consent to the processing of their personal data for one or more specific purposes;
 - 4.1.2 The processing is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract;
 - 4.1.3 The processing is necessary for compliance with a legal obligation to which the data controller is subject;
 - 4.1.4 The processing is necessary to protect the vital interests of the data subject or of another natural person;

- 4.1.5 The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller; or
 - 4.1.6 The processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.
- 4.2 If the personal data in question is “special category personal data” (also known as “sensitive personal data”) (for example, data concerning the data subject’s race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation), at least one of the following conditions must be met:
- 4.2.1 The data subject has given their explicit consent to the processing of such data for one or more specified purposes (unless EU or EU Member State law prohibits them from doing so);
 - 4.2.2 The processing is necessary for the purpose of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment, social security, and social protection law (insofar as it is authorised by law or a collective agreement pursuant to law which provides for appropriate safeguards for the fundamental rights and interests of the data subject);
 - 4.2.3 The processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
 - 4.2.4 The data controller is a foundation, association, or other non-profit body with a political, philosophical, religious, or trade union aim, and the processing is carried out in the course of its legitimate activities, provided that the processing relates solely to the members or former members of that body or to persons who have regular contact with it in connection with its purposes and that the personal data is not disclosed outside the body without the consent of the data subjects;
 - 4.2.5 The processing relates to personal data which is manifestly made public by the data subject;
 - 4.2.6 The processing is necessary for the conduct of legal claims or whenever courts are acting in their judicial capacity;
 - 4.2.7 The processing is necessary for substantial public interest reasons, on the basis of law which shall be proportionate to the aim pursued, shall respect the essence of the right to data protection, and shall provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject;
 - 4.2.8 The processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of an employee, for medical diagnosis, for the provision of health or social care or treatment, or the management of health or social care systems or services on the basis of law or pursuant to a contract with a health professional, subject to the conditions and safeguards referred to in Article 9(3) of the UK GDPR;
 - 4.2.9 The processing is necessary for public interest reasons in the area of public health, for example, protecting against serious cross-border

threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject (in particular, professional secrecy); or

4.2.10 The processing is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with Article 89(1) of the UK GDPR (as supplemented by section 19 of the Data Protection Act 2018) based on law which shall be proportionate to the aim pursued, respect the essence of the right to data protection, and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

5. Specified, Explicit, and Legitimate Purposes

5.1 The Company collects and processes personal data for the purposes of developing, producing and distributing television and film productions including contacting and contracting potential and actual cast members, production personnel including heads of departments and crew, processing CVs and job applications for staff and freelance positions. This includes:

5.1.1 Personal data collected directly from data subjects; and

5.1.2 Personal data obtained from third parties.

5.2 The Company only collects, processes, and holds personal data for the specific purpose set out in clause 5.1 above (or for other purposes expressly permitted by the Data Protection Law).

5.3 Data subjects are kept informed at all times of the purpose or purposes for which the Company uses their personal data. Please refer to Part 12 for more information on keeping data subjects informed.

5.4 In the event that it is intended that personal data is collected, processed or held for purposes other than those set out in clause 5.1, such purposes must be authorised by the Data Protection Officer in writing and data subjects must be informed in accordance with clause 5.3 and Part 12 of this Policy.

6. Adequate, Relevant, and Limited Data Processing

The Company will only collect and process personal data for and to the extent necessary for the specific purpose or purposes of which data subjects have been informed, above.

7. Accuracy of Data and Keeping Data Up-to-Date

7.1 The Company shall ensure that all personal data collected, processed, and held by it is kept accurate and up-to-date. This includes, but is not limited to, the rectification of personal data at the request of a data subject, as set out in Part 14, below.

7.2 The accuracy of personal data shall be checked when it is collected and at regular intervals thereafter. If any personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

8. Secure Processing

- 8.1 The Company shall ensure that all personal data collected, held, and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage. Further details of the technical and organisational measures which shall be taken are provided in clauses 22 to 27 of this Policy.
- 8.2 All technical and organisational measures taken to protect personal data shall be regularly reviewed and evaluated to ensure their ongoing effectiveness and the continued security of personal data.
- 8.3 Data security must be maintained at all times by protecting the confidentiality, integrity, and availability of all personal data as follows:
 - a) only those with a genuine need to access and use personal data and who are authorised to do so may access and use it;
 - b) personal data must be accurate and suitable for the purpose or purposes for which it is collected, held, and processed; and
 - c) authorised users must always be able to access the personal data as required for the authorised purpose or purposes.

9. Accountability and Record-Keeping

- 9.1 The Company's Data Protection Officer is Dan Leon.
- 9.2 The Data Protection Officer shall be responsible for administering this Policy and for developing and implementing any applicable related policies, procedures and/or guidelines
- 9.3 The Company shall follow a privacy by design approach at all times when collecting, holding, and processing personal data. Data Protection Impact Assessments shall be conducted if any processing presents a significant risk to the rights and freedoms of data subjects (please refer to Part 14 for further information).
- 9.4 All employees, agents, contractors, or other parties working on behalf of the Company shall be given appropriate training in data protection and privacy, addressing the relevant aspects of Data Protection Law, this Policy, and all other applicable Company policies.
- 9.5 The Company's data protection compliance shall be regularly reviewed and evaluated by means of Data Protection Audits.
- 9.6 The Company shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:
 - 9.6.1 The name and details of the Company, its Data Protection Officer, and any applicable third-party data transfers (including data processor is and other data controllers with whom personal data is shared);
 - 9.6.2 The purposes for which the Company collects, holds, and processes personal data;

- 9.6.3 The Company's legal basis or bases (including, but not limited to, consent, the mechanism(s) for obtaining such consent, and records of such consent) for collecting, holding, and processing personal data;
- 9.6.4 Details of the categories of personal data collected, held, and processed by the Company, and the categories of data subject to which that personal data relates;
- 9.6.5 Details of any transfers of personal data to non-UK countries including all mechanisms and security safeguards;
- 9.6.6 Further details of how long personal data will be retained by the Company (please refer to the Data Retention section below);
- 9.6.7 Details of personal data storage, including location(s); and
- 9.6.8 Detailed descriptions of all technical and organisational measures taken by the Company to ensure the security of personal data.

10. **Data Protection Impact Assessments and Privacy by Design**

- 10.1 The Company shall carry out Data Protection Impact Assessments for any and all new projects and/or new uses of personal data which involve the use of new technologies and where the processing involved is likely to result in a high risk to the rights and freedoms of data subjects under the Data Protection Law.
- 10.2 The principles of privacy by design should be followed at all times when collecting, holding, and processing personal data. The following factors should be taken into consideration:
 - a) the nature, scope, context, and purpose or purposes of the collection, holding, and processing;
 - b) the state of the art of all relevant technical and organisational measures to be taken;
 - c) the cost of implementing such measures; and
- 10.3 the risks posed to data subjects and to the Company, including their likelihood and severity
- 10.4 Data Protection Impact Assessments shall be overseen by the Data Protection Officer and shall address the following:
 - 10.4.1 The type(s) of personal data that will be collected, held, and processed;
 - 10.4.2 The purpose(s) for which personal data is to be used;
 - 10.4.3 The Company's objectives;
 - 10.4.4 How personal data is to be used;
 - 10.4.5 The parties (internal and/or external) who are to be consulted;
 - 10.4.6 The necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed;
 - 10.4.7 Risks posed to data subjects;
 - 10.4.8 Risks posed both within and to the Company; and
 - 10.4.9 Proposed measures to minimise and handle identified risks.

11. Keeping Data Subjects Informed

- 11.1 The Company shall provide the information set out in Part 12.2 to every data subject:
- 11.1.1 Where personal data is collected directly from data subjects, those data subjects will be informed of its purpose at the time of collection; and
 - 11.1.2 Where personal data is obtained from a third party, the relevant data subjects will be informed of its purpose:
 - a) if the personal data is used to communicate with the data subject, when the first communication is made; or
 - b) if the personal data is to be transferred to another party, before that transfer is made; or
 - c) as soon as reasonably possible and in any event not more than one month after the personal data is obtained.
- 11.2 The following information shall be provided in the form of a privacy notice:
- 11.2.1 Details of the Company including, but not limited to, contact details and of the names and contact details of any applicable representatives and its Data Protection Officer;
 - 11.2.2 The purpose(s) for which the personal data is being collected and will be processed and the lawful basis justifying that collection and processing;
 - 11.2.3 Where applicable, the legitimate interests upon which the Company is justifying its collection and processing of the personal data;
 - 11.2.4 Where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed;
 - 11.2.5 Where the personal data is to be transferred to one or more third parties, details of those parties;
 - 11.2.6 Where the personal data is to be transferred to a third party that is located outside of the UK, details of that transfer, including but not limited to the safeguards in place (see Part 24 of this Policy for further details);
 - 11.2.7 Details of applicable data retention periods;
 - 11.2.8 Details of the data subject's rights under the UK GDPR;
 - 11.2.9 Details of the data subject's right to withdraw their consent to the Company's processing of their personal data at any time;
 - 11.2.10 Details of the data subject's right to complain to the Information Commissioner's Office;;
 - 11.2.11 Where the personal data is not obtained directly from the data subject, details about the source of that personal data;
 - 11.1.12 Where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it; and
 - 11.1.13 Details of any automated decision-making or profiling that will take place using the personal data, including information on how decisions

will be made, the significance of those decisions, and any consequences.

12 Data Subject Access

- 12.1 Data subjects may make subject access requests (“SARs”) at any time to find out more about the personal data which the Company holds about them, what it is doing with that personal data, and why.
- 12.2 Employees wishing to make a SAR should do so in writing, using a Subject Access Request Form, sending the form to the Company’s Data Protection Officer at 27-28 Eastcastle Street London W1W 8DH.
- 12.3 Responses to SARs must normally be made within one month of receipt, however this may be extended by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, the data subject shall be informed.
- 12.4 All SARs received shall be handled by the Company’s Data Protection Officer.
- 12.5 The Company does not charge a fee for the handling of normal SARs. The Company reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

13 Rectification of Personal Data

- 13.1 Data subjects have the right to require the Company to rectify any of their personal data that is inaccurate or incomplete.
- 13.2 The Company shall rectify the personal data in question, and inform the data subject of that rectification, within one month of the data subject informing the Company of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.
- 13.3 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification that must be made to that personal data.

14. Erasure of Personal Data

- 14.1 Data subjects have the right to request that the Company erases the personal data it holds about them in the following circumstances:
 - 14.1.1 It is no longer necessary for the Company to hold that personal data with respect to the purpose(s) for which it was originally collected or processed;
 - 14.1.2 The data subject wishes to withdraw their consent to the Company holding and processing their personal data;
 - 14.1.3 The data subject objects to the Company holding and processing their personal data (and there is no overriding legitimate interest to allow the Company to continue doing so) (see Part 17 of this Policy for further details concerning the right to object);
 - 14.1.4 The personal data has been processed unlawfully;

14.1.5 The personal data needs to be erased in order for the Company to comply with a particular legal obligation.

14.2 Unless the Company has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.

14.3 In the event that any personal data that is to be erased in response to a data subject's request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

15. **Restriction of Personal Data Processing**

15.1 Data subjects may request that the Company ceases processing the personal data it holds about them. If a data subject makes such a request, the Company shall retain only the amount of personal data concerning that data subject (if any) that is necessary to ensure that the personal data in question is not processed further.

15.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

16. **Objections to Personal Data Processing**

16.1 Data subjects have the right to object to the Company processing their personal data based on legitimate interests, for direct marketing (including profiling).

16.2 Where a data subject objects to the Company processing their personal data based on its legitimate interests, the Company shall cease such processing immediately, unless it can be demonstrated that the Company's legitimate grounds for such processing override the data subject's interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.

16.3 Where a data subject objects to the Company processing their personal data for direct marketing purposes, the Company shall cease such processing promptly.

17. **Data Security - Storage**

The Company shall ensure that the following measures are taken with respect to the storage of personal data:

17.1 All electronic copies of personal data should be stored securely using passwords and encryption;

17.2 All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet, or similar;

17.3 No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets, and smartphones), whether such device belongs to

the Company or otherwise without the formal written approval of the Data Protection Officer or person(s) authorised by the Data Protection Officer and, in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary; and

- 17.4 No personal data should be transferred to any device personally belonging to an employee, agent, contractor or other party working on behalf of the Company and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the applicable Data Protection Law (which may include demonstrating to the Company that all suitable technical and organisational measures have been taken).

18. Data Security - Disposal

When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of.

19. Data Security - Use of Personal Data

The Company shall ensure that the following measures are taken with respect to the use of personal data:

- 19.1 No personal data may be shared informally and if an employee, agent, sub-contractor, or other party working on behalf of the Company requires access to any personal data that they do not already have access to, such access should be formally requested from the Data Protection Officer or person(s) authorised by the Data Protection Officer;
- 19.2 No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without the authorisation of the Data Protection Officer or person(s) authorised by the Data Protection Officer;
- 19.3 Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, contractors, or other parties at any time;
- 19.4 If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it; and
- 19.5 Where personal data held by the Company is used for marketing purposes, it shall be the responsibility of the Data Protection Officer or person(s) authorised by the Data Protection Officer to ensure that the appropriate consent is obtained and that no data subjects have opted out, whether directly or via a third-party service such as the TPS.

20. Data Retention

- 20.1 The Company shall not retain any personal data for any longer than is necessary in light of the purpose(s) for which that data is collected, held, and processed.

- 20.2 Different types of personal data, used for different purposes, will necessarily be retained for different periods (and its retention periodically reviewed), as set out below.
- 20.3 When establishing and/or reviewing retention periods, the following shall be taken into account:
- a) The objectives and requirements of the Company;
 - b) The type of personal data in question;
 - c) The purpose(s) for which the data in question is collected, held, and processed;
 - d) The Company's legal basis for collecting, holding, and processing that data;
 - e) The category or categories of data subject to whom the data relates;
 - f) Any periods of retention expressly agreed by the data subject.
- 20.4 If a precise retention period cannot be fixed for a particular type of data, criteria shall be established by which the retention of the data will be determined, thereby ensuring that the data in question, and the retention of that data, can be regularly reviewed against those criteria.
- 20.5 Notwithstanding the following defined retention periods, certain personal data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made within the Company to do so (whether in response to a request by a data subject or otherwise).

21. Data Security - IT Security

The Company shall ensure that the following measures are taken with respect to IT and information security:

- 21.1 All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols.;
- 21.2 Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of the Company, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;
- 21.3 No software may be installed on any Company-owned computer or device without the prior approval of the Data Protection Officer or person(s) authorised by the Data Protection Officer.

22. Organisational Measures

The Company shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- 22.1 All employees, agents, contractors, or other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under the Data Protection Law and under this Policy, and shall be provided with a copy of this Policy;
- 22.2 Only employees, agents, contractors, or other parties working on behalf of the

Company that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Company;

- 22.3 All sharing of personal data shall comply with the information provided to the relevant data subjects and, if required, the consent of such data subjects shall be obtained prior to the sharing of their personal data;
- 22.4 All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately trained to do so;
- 22.5 All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately supervised;
- 22.6 All employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be required and encouraged to exercise care, caution, and discretion when discussing work-related matters that relate to personal data, whether in the workplace or otherwise;
- 22.7 Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed;
- 22.8 All personal data held by the Company shall be reviewed periodically;
- 22.9 The performance of those employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed;
- 22.10 All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be bound to do so in accordance with the principles of the Data Protection Law and this Policy by contract;
- 22.11 All agents, contractors, or other parties working on behalf of the Company handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of the Company arising out of this Policy and the Data Protection Law; and
- 22.12 Where any agent, contractor or other party working on behalf of the Company handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless the Company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

23. **Transferring Personal Data to a Country Outside the UK**

- 23.1 The Company may from time to time transfer ('transfer' includes making available remotely) personal data to countries outside of the UK. The UK GDPR restricts such transfers in order to ensure that the level of protection given to data subjects is not compromised.
- 23.2 Personal data may only be transferred to a country outside of the UK if one of the following applies:
 - a) The UK has issued regulations confirming that the country in question ensures an adequate level of protection (referred to as 'adequacy decisions' or 'adequacy regulations'). From 1 January 2021, transfers of personal data from the UK to EEA countries will continue to be permitted. Transitional provisions are also in place to recognise pre-existing EU adequacy decisions in the UK.

- b) Appropriate safeguards are in place including binding corporate rules, standard contractual clauses approved for use in the UK (this includes those adopted by the European Commission prior to 1 January 2021), an approved code of conduct, or an approved certification mechanism.
- c) The transfer is made with the informed and explicit consent of the relevant data subject(s).
- d) The transfer is necessary for one of the other reasons set out in the UK GDPR including the performance of a contract between the data subject and the Company; public interest reasons; for the establishment, exercise, or defence of legal claims; to protect the vital interests of the data subject where the data subject is physically or legally incapable of giving consent; or, in limited circumstances, for the Company's legitimate interests.

24. Data Breach Notification

- 24.1 All personal data breaches must be reported immediately to the Company's Data Protection Officer.
- 24.2 If an employee, agent, contractor, or other party working on behalf of the Company becomes aware of or suspects that a personal data breach has occurred, they must not attempt to investigate it themselves. Any and all evidence relating to the personal data breach in question should be carefully retained.
- 24.3 If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Officer must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.
- 24.4 In the event that a personal data breach is likely to result in a high risk (that is, a higher risk than that described under clause 24.2) to the rights and freedoms of data subjects, the Data Protection Officer must ensure that all affected data subjects are informed of the breach directly and without undue delay.
- 24.5 Data breach notifications shall include the following information:
 - 24.5.1 The categories and approximate number of data subjects concerned;
 - 24.5.2 The categories and approximate number of personal data records concerned;
 - 24.5.3 The name and contact details of the Company's data protection officer (or other contact point where more information can be obtained);
 - 24.5.4 The likely consequences of the breach;
 - 24.5.5 Details of the measures taken, or proposed to be taken, by the Company to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

25. Implementation of Policy

- 25.1 This Policy shall be deemed effective as of 7th May 2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

25.2 This Policy was reviewed and updated on 25 October 2022 and shall be reviewed on or before 24 October 2024.