

Introduction

Your information is very important to us and we look after it carefully in line with privacy and data protection laws, including the General Data Protection Regulation and any applicable UK legislation. We've set out below in more detail what information we collect about you, how we use that information and your rights as a data subject

This Employee Privacy Notice (which is for anyone employed on a permanent or fixed-term contract of employment) describes the categories of personal information we may process, how your personal information may be processed and how your privacy is safeguarded while you're here with us. It's intended to comply with our obligations to provide you with information about the Company's processing of your personal information under privacy laws. It doesn't form part of your contract of employment.

We may update this Employee Privacy Notice from time to time and will notify you when any changes are made. This Employee Privacy Notice was last updated on 25 May 2018.

The Company is committed to protecting the security of the personal information you share with us. To support this, we've taken appropriate technical, physical and organisational measures to make sure the level of security is appropriate to the risk. Our policies covering *Privacy & Data Protection* and our *Code of Conduct* are available on the Twofour intranet.

More detail on the Employee Privacy Notice:

- [Who is the Company?](#)
- [How does the Company collect data?](#)
- [What information is the Company processing and why?](#)
- [Who has access to my data?](#)
- [Where is my data transferred?](#)
- [How long does the Company keep my data?](#)
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Who is the Company?

Any reference to "we", "us", "our" and "the Company" is to Twofour Group, part of the ITV plc group of companies. We're known as the "data controller". For more information about how we process your data, including how to exercise your rights as a data subject please e-mail privacy@twofour.co.uk. The Company (or relevant associated company of the Company identified in your employment contract) will be the data controller of your personal data. In addition, data processing may be undertaken by other companies within the ITV plc group of companies and the processing of your personal data will be subject to or governed by those companies' privacy policies. You can contact us at privacy@twofour.co.uk

How does the Company collect data?

The Company collects and records your personal information from a variety of sources, but mainly directly from you. You will usually provide this information directly to your manager, HR team or enter it into our systems (for example, your participation in HR processes or emails you send). Further information about you will come from your hiring manager, line manager or the HR team.

We may also obtain some information from third parties, for example, references from a previous employer, medical reports from external professionals, tax authorities, benefit providers or where we employ a third party to carry out a background check (where permitted by applicable law).

In some circumstances, data may be collected indirectly from monitoring devices or by other means (for example, building and location access control and monitoring systems, Closed-circuit television (CCTV), telephone logs and recordings, and email and Internet access logs), if and to the extent permitted by applicable laws.

In these circumstances, the data may be collected by the Company or a third party provider of the relevant service. This type of data is generally not accessed on a routine basis but access is possible. Access may occur, for instance, in situations where the Company is investigating possible violations of Company policies such as those relating to travel and expense reimbursement, use of the telephone system and the Internet, employee conduct generally, or where the data is needed for compliance or billing purposes. More frequent access to such data may occur incidental to an email surveillance programme, if and to the extent permitted by applicable laws.

Where we ask you to provide personal information to us on a mandatory basis, we'll inform you of this at the time of collection. In the event particular information is required by the contract or statute, this will be indicated. Failure to provide any mandatory information will mean we cannot carry out certain HR processes. For example, if you do not provide us with your bank details, we will not be able to pay you.

In some cases it may mean we're unable to continue with your employment as the Company will not have the personal information we believe necessary for the effective and efficient administration and management of our relationship with you.

As well as personal information about you, you may also provide the Company with personal information of third parties, for example, your dependents and other family members, for purposes of HR administration and management, including the administration of benefits and to contact your next of kin in an emergency. Before you provide any third party personal information like this to the Company, you must first inform these third parties of what data you intend to provide to the Company and the processing carried out by the Company, as detailed in this Employee Privacy Notice.

What information are we processing and why?

Personal information means any information describing or relating to an identifiable individual, such as name, address, age, contact details, appraisals, health data etc. Additional information that we process on employees includes:

Personal Information

We will collect some or all of the various types of personal information about you for the purposes described in this Employee Privacy Notice including:

- *Employee related data*: your title, forename, middle name(s) and surname, birth name, preferred name, any additional names, gender, nationality, second nationality, civil/marital status, date of birth, age, home contact details (e.g. address, telephone number, email), national insurance, social security or any other national identification number, immigration and eligibility to work data, languages spoken; next of kin/dependent contact information;
- *Data related to your employment with the Company*: work contact details (e.g. address, telephone number, email), work location, default hours, default language, time zone and currency for location, employee number and various system IDs, appraisal information, work biography, reporting line, employee type, hire/contract start and end dates, cost centre, job title and description, working hours and patterns, whether you're full or part time; termination/contract end date; reason for termination; your last day of work; exit interviews, references, status (active/inactive/terminated); reason for any job change and date of change; benefit coverage start date;
- *Recruitment data*: qualifications, references, CV and application, interview and assessment data, vetting and verification information;
- *Talent and Development data*; feedback from other colleagues, career and training history
- *Regulatory data*: records of your registration with any applicable regulatory authority, your regulated status and any regulatory references;
- *Remuneration and benefits data*: including salary, one-off payments, allowances, bonus and incentive plans, pension schemes, bank account details, job level, social security number, tax information, expenses, participation in benefits provided by third parties;
- *Leave information*: absence records (including dates and categories of leave/time off), holiday dates and information related to family leave;
- *Data relating to HR processes*: allegations, investigations and proceeding records and outcomes, colleague and manager feedback, appraisals, internal talent management and succession planning, formal and informal performance management processes, flexible working processes, restructure and redundancy plans, consultation records, selection and redeployment data, health and safety audits, risk assessments, incident reports, data relating to training and development needs or training received, call sheets, contacts lists, organising travel and hotel bookings, insurance cover;
- *Monitoring data (to the extent permitted by applicable laws)*: closed-circuit television (CCTV) footage, system and building login and access records, keystroke, download and print records, data caught by IT security programmes and filters;
- *Employee claims, complaints and disclosures data* - termination arrangements and payments, subject matter of employment based litigation and complaints, employee involvement in incident reporting and disclosures;
- *Supporting the Twofour technology estate* - personal contact details, browsing history, data stored on laptops, home ISP provider details, sound recording for training and quality purposes
- *Equality and diversity data* - where permitted by law and provided voluntarily, data regarding ethnicity, gender, age, race, nationality, religious belief, community background and sexual orientation

Certain additional information may be collected where this is necessary and permitted by local applicable laws.

For the processing of your pension data, the Trustees of the relevant pension scheme will send you a separate privacy notice to cover this.

Special categories of personal information

To the extent permitted by applicable laws, the Company may also collect and process a limited amount of personal information

falling into special categories, sometimes called “sensitive personal data”. This includes information relating to such matters as racial or ethnic origin, religious beliefs, physical or mental health (including details of adjustments or accommodations), certain maternity/adoption information, sexual orientation, criminal records and information regarding criminal offences or proceedings.

Purposes for Processing Personal Data

In general, the processing of your personal information is necessary to perform the contract of employment between you and the Company and for compliance with legal obligations which the Company is subject to. Processing is also necessary for the purpose of the legitimate interests pursued by the Company, except where such interests are overridden by your interests or fundamental rights and freedoms.

This processing also enables us to provide you with various benefits and to manage and administrate your employment and where applicable to consider you for future assignments within the Company.

[See the full list of processes](#) that use your personal information, including the purpose and the lawful basis of each process. We may undertake certain processing of personal information which is subject to additional Privacy Notices. We'll bring these to your attention where they arise.

Some of our processing will involve **special categories of sensitive information**, as described above. This information will only be processed where data protection law allows this using a specific lawful justification, under one of the following bases where the processing is necessary:

- Where explicit consent has been given;
- Where the processing is necessary;
 - for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws;
 - for the purposes of preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, to the extent permitted by applicable laws;
 - to protect your vital interests or another person where you're physically or legally incapable of giving consent (for example in exceptional emergency situations, such as a medical emergency);
 - for the establishment, exercise or defence of legal claims;
 - for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained.

[See some examples of processes using special categories of sensitive information](#)

We may ask for your consent to certain processing which is not otherwise justified under one of the above bases. If consent is required for the processing in question, it will be sought directly from you to make sure it's freely given, informed and explicit. Information about such processing will be provided to you at the time consent is requested, along with the impact of not providing such consent.

You should be aware that it's not a condition or requirement of your employment to agree to any request for consent from the Company. Where consent is given, it may be withdrawn by you at any time, but this will not impact on any other lawful basis for processing relied on by the Company.

Personal information relating to **criminal convictions and offences** will only be processed where authorised by applicable laws, for example:

- A criminal record check may be carried out on recruitment or transfer where authorised by applicable laws;
- An allegation of a criminal offence or conviction arising during your relationship with the Company may be processed where required or authorised. For example, where we have a legal or regulatory requirement to report an offence, or applicable laws authorise the Company to process information about the offence for the purpose of making decisions regarding your relationship with the Company e.g. in a disciplinary process.

Who has access to my data?

Your personal information can be accessed by or may be disclosed to other companies within the Company on a need-to-know basis to:

- Human Resources team members;
- Those responsible for managing or making decisions in connection with your relationship with the Company or involved in an HR process concerning your relationship with the Company;
- Production or project teams and hiring managers;
- System administrators and system maintenance teams in the Company such as Finance, Technology, HR Systems, Reporting teams.

Certain basic personal information, such as your name, location, job title, contact information and any published skills and experience may also be accessible to other employees via the Company's intranet.

Your personal information will only be shared where necessary with third parties, e.g. providers of payroll, pay review and bonus administration, referencing, benefits, pensions, healthcare, onboarding/offboarding and training services and other third parties such as the Company's insurers, bankers, IT administrators, lawyers, auditors, investors, consultants and other professional advisors. Where these third parties act as a "data processor", they carry out their tasks on our behalf and upon our instruction for the above mentioned purposes. In this case your personal information will only be disclosed to these third parties to the extent necessary to provide the required services.

Personal information may also be shared with certain interconnecting systems (such as recruitment, payroll, pension and benefits systems). Data contained in such systems may be accessible by providers of those systems, their associated companies and sub-contractors. In addition, we may share personal information with national authorities in order to comply with a legal obligation to which we are subject. This is, for example, the case in the framework of imminent or pending legal proceedings or a statutory audit.

Where is my data transferred?

Your personal information is mainly processed within the European Economic Area (EEA), however from time to time your personal information (including special categories of personal information) will be transferred elsewhere in the world to ITV group companies or third parties to process, for the purposes described in this Employee Privacy Notice. ITV has group companies within the EEA and also in Hong Kong, Australia and the USA. This may also include transfer of your personal data for the purposes of any international secondments or assignments.

Your personal information may be transferred to countries whose data protection laws may be less stringent than yours. Where this is the case, the Company will ensure that appropriate or suitable safeguards are in place to protect your personal information and that its transfer is in compliance with applicable data protection laws.

Where required by applicable data protection laws, the Company will ensure that service providers (including other Company associated companies) sign standard contractual clauses as approved by the European Commission or other supervisory authority with jurisdiction over the relevant Company exporter. If you wish to obtain a copy of any standard contractual clauses in place which relate to transfers of your personal information please contact privacy@twofour.co.uk.

How long does the Company keep my data?

We retain your personal information only so long as it is required for purposes for which it was collected, whilst keeping it as up to date as possible and making sure irrelevant or excessive data is deleted or made anonymous as soon as reasonably practicable.

Our aim is to make sure that data is retained in accordance with the periods set out in the **Retention Schedule** found listed on our website and that data is deleted as soon as reasonably practicable thereafter. We are looking to put into place suitable processes and procedures to achieve this aim.

To perform our contractual obligations and comply with applicable laws, we generally retain your information for the duration of your employment plus a further six years (and to the end of that financial year). Thereafter we will securely destroy your data, including data held by any third party, unless there is an obligation to retain it further.

We may keep some specific types of data, (for example tax records, pensions data) for different periods of time, as required by applicable law.

What rights do I have and how can I use them?

In law you are the 'Data Subject' and you have several rights that you can exercise over your data such as the right to access, correct, and request to delete your personal information. From 25th May 2018 you have some additional rights e.g. data portability, restricting the processing or objecting to it if was done under legitimate interests.

You also have the right to lodge a complaint with a supervisory authority, in particular in your country of residence (e.g. the Information Commissioner's Office in the UK), if you consider the processing of your personal information infringes applicable law.

See below to [read more on your rights and how to use them](#) or contact privacy@twofour.co.uk.

Who is the Company? More information...

Twofour Group Limited is registered in England (Company Number: 05493388) and its registered office is; Twofour Studios, Estover, Plymouth, Devon, PL6 7RG. The ITV group of companies includes, but is not limited to, the following companies:

- **ITV Studios Limited**
Registered in England under number 3106525
Registered Office: 2 Waterhouse Square, 140 Holborn, London EC1N 2AE
- **ITV Broadcasting Ltd**
Registered in England under number 955957
Registered Office: 2 Waterhouse Square, 140 Holborn, London EC1N 2AE
- **ITV Services Limited**
Registered in England under number 229607
Registered Office: 2 Waterhouse Square, 140 Holborn, London EC1N 2AE
- **ITV Global Entertainment Ltd**
Registered in England under number 2203983
Registered Office: 2 Waterhouse Square, 140 Holborn, London EC1N 2AE
- **3sixtymedia Ltd**
Registered in England under number 2203983
Registered Office: 2 Waterhouse Square, 140 Holborn, London EC1N 2AE
- **ITV Consumer Ltd**
Registered in England under number 2937518
Registered Office: 2 Waterhouse Square, 140 Holborn, London EC1N 2AE
- **Channel Television Limited**
Registered in Jersey under number 35714
Registered Office: Le Capelain House, Castle Quay, St Helier, JE2 3EH
- **UTV Limited**
Registered in Northern Ireland under number NI0004230
Registered office: Ormeau Road, Belfast, BT7 1EB, United Kingdom

Any queries relating to the General Data Protection Regulation (GDPR) should be directed to privacy@twofour.co.uk.

Twofour Group Limited is registered with Information Commissioner's Office (ICO) as data controller (registration number: Z9301504). For more information please visit the ICO's website www.ico.org.uk

Other companies in the ITV group are registered with ICO where necessary.

Purpose and lawful basis

Ref	Purpose for processing	Necessary for Performance of Contract	Necessary to comply with a Legal Obligation	Legitimate Interest	What is the Company's Legitimate Interest
a)	Recruitment and selection	Y	Y	Y	The Company considers it has a legitimate interest in fully assessing applications for employment to ensure only suitable and appropriate candidates are both assessed and selected, so that the Company identifies the right people for its business who will be able to contribute to its operations and to the culture.
b)	Appropriate vetting for recruitment and team allocation including, where relevant and appropriate credit checks, right to work verification, identity fraud checks, criminal record checks (if and to the extent permitted by applicable laws), relevant employment history, relevant regulatory status and professional qualifications;		Y	Y	The Company considers it has a legitimate interest in managing its business operations in the most effective way and needs to make decisions relating to the future of its business in order to preserve its business operations or grow its business, including the interests of the workforce as a whole and the Company customer base.
c)	Providing and administering remuneration, benefits, pension and incentive schemes and reimbursement of business costs and expenses and making appropriate tax and social security and other deductions and contributions as required;	Y	Y	Y	The Company considers it has a legitimate interest in managing its workforce and operating its business, including ensuring that employees are properly remunerated and that remuneration is set at an appropriate level and in undertaking normal business operations.
d)	Allocating and managing duties and responsibilities and the business activities to which they relate, including business travel;	Y		Y	The Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring each employee undertakes appropriate duties, is properly trained and undertakes their role correctly and in accordance with appropriate procedures and in undertaking normal business operations.
e)	Identifying and communicating effectively with employees;	Y		Y	The Company considers it has a legitimate interest in managing its workforce and operating its business including undertaking normal business operations and maintaining a dialogue with employees.
f)	Managing and operating appraisals, conduct, performance, capability, absence and grievance related reviews, allegations, complaints, investigations and processes and other informal and formal HR processes and making related management decisions;	Y	Y	Y	The Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring each employee undertakes appropriate duties, is properly trained and undertakes their role correctly and in accordance with appropriate procedures. It also includes addressing and resolving employee related concerns and issues and complying with applicable laws and regulations.

Ref	Purpose for processing	Necessary for Performance of Contract	Necessary to comply with a Legal Obligation	Legitimate Interest	What is the Company's Legitimate Interest
g)	Training, development, promotion, career, talent management and succession planning and business contingency planning;	Y	Y	Y	The Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring that each employee undertakes appropriate duties, is properly trained and undertakes their roles correctly and in accordance with appropriate procedures.
h)	Consultations or discussions with representatives of employees;	Y	Y	Y	The Company considers it has a legitimate interest in managing its workforce and operating its business including undertaking normal business operations and maintaining a dialogue with employees and complying with applicable laws and regulations.
i)	Conducting statutory reporting and surveys for benchmarking, identifying improved ways of working, employee relations and engagement at work (these will often be anonymous but may include profiling data such as age and gender to support analysis of results);		Y	Y	The Company considers it has a legitimate interest in managing its workforce and operating its business. This includes ensuring that each employee undertakes appropriate duties, is properly trained and undertakes their roles correctly and in accordance with appropriate procedures, undertaking normal business operations and maintaining a dialogue with employees, ensuring that employees are properly remunerated and that this remuneration is set an appropriate level and complying with applicable laws and regulations. The Company has a legitimate interest in seeking the views of its workforce and giving them the opportunity to raise concerns or suggest improvements. Effective employee engagement helps ensure the Company makes the best decisions for the business and is important to attract and retain high calibre employees. This will support the Company to achieve its immediate and long-term business goals and outcomes.

j)	Processing information about absence or medical information regarding physical or mental health or condition in order to: assess eligibility for remuneration and benefits related to health, sickness absence and long-term incapacity; determine fitness for work; facilitate a return to work; make adjustments or accommodations to duties or the workplace; make management decisions regarding employment or engagement or continued employment or engagement or redeployment; and conduct related management processes;	Y	Y	Y	<p>The Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring each employee undertakes appropriate duties, is properly trained and undertakes their roles correctly and in accordance with appropriate procedures and managing employee absence and leave entitlements.</p> <p>The Company considers that it has a legitimate interest in managing health and safety risk and operating its business. This includes supporting the welfare of employees and taking steps to identify and mitigate risks to employees' health, safety or welfare, ensure fitness for work and to manage absence and incapacity impacting on the ability of employees to perform their roles.</p>
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Ref	Purpose for processing	Necessary for Performance of Contract	Necessary to comply with a Legal Obligation	Legitimate Interest	What is the Company's Legitimate Interest
					Effective support and management of employees supports business performance and the attraction and retention of high calibre employees. This supports the Company's immediate and long-term business goals and outcomes.
k)	For planning, managing and carrying out restructuring or redundancies or other change programmes including appropriate consultation, selection, alternative employment searches and related management decisions;		Y	Y	The Company considers it has a legitimate interest in managing its business operations in the most effective way. The Company needs to make decisions relating to the future of its business in order to preserve its business operations or grow its business. These interests include the interests of the workforce as a whole and the Company customer base.
l)	Complying with reference requests where the Company is named by the individual as a referee;			Y	The Company considers it is in the legitimate interests of a new employer to receive confirmation of employment details from the Company for the purposes of confirming the former employee's employment history.
m)	Operating email, IT, internet, social media, HR related and other company policies and procedures. To the extent permitted by applicable laws, the Company carries out monitoring of the Company's IT systems to protect and maintain the integrity of the Company's IT systems and infrastructure; to ensure compliance with the Company's IT policies and to locate information through searches where needed for a	Y	Y	Y	The Company considers it has a legitimate interest in managing its workforce and operating its business. The IT function is essential to ensuring that this can be carried out in the most effective way. This includes maintaining the integrity and security of data and facilitating records management.

	legitimate business purpose;				
n)	Satisfying its regulatory obligations to supervise the persons employed or appointed by it to conduct business on its behalf, including preventing, detecting and investigating a wide range of activities and behaviours, whether relating to specific business dealings or to the workplace generally and liaising with regulatory authorities;		Y	Y	The Company considers it has a legitimate interest in ensuring that its business, clients, employees and systems are protected including detecting and preventing crimes or criminal activity; ensuring only appropriate employees are engaged in our business; and ensuring compliance with export control and other legal requirements placed upon us (both by EU and non-EU laws).
o)	Protecting the private, confidential and proprietary information of the Company, its employees, its clients and third parties;		Y	Y	The Company considers it has a legitimate interest in ensuring that its business, clients, employees and systems are protected including protecting our assets and the integrity of our systems, detecting and preventing loss of our confidential information and proprietary information.

Ref	Purpose for processing	Necessary for Performance of Contract	Necessary to comply with a Legal Obligation	Legitimate Interest	What is the Company's Legitimate Interest
p)	Complying with applicable laws and regulation (for example maternity or parental leave legislation, working time and health and safety legislation, taxation rules, worker consultation requirements, other employment laws and regulation to which the Company is subject in the conduct of its business);		Y	Y	The Company considers that it has a legitimate interest in managing its workforce and operating its business. This includes ensuring that each employee undertakes appropriate duties, is properly trained and undertakes their roles correctly and in accordance with appropriate procedures. It is also necessary to undertake normal business operations and maintain a dialogue with employees and comply with applicable laws and regulations.
q)	Monitoring programmes to ensure equality of opportunity and diversity with regard to personal characteristics protected under applicable anti-discrimination laws;		Y	Y	The Company considers it has legitimate interests in ensuring that it takes action to prevent discrimination and promote an inclusive and diverse workplace.

r)	Planning, due diligence and implementation in relation to a commercial transaction or service transfer involving the Company that impacts on your relationship with the Company for example mergers and acquisitions or a transfer of your employment under applicable automatic transfer rules;		Y	Y	<p>The Company considers it has a legitimate interest in managing its business operations in the most effective way. The Company needs to make decisions relating to the future of its business in order to preserve its business operations or grow its business. These interests include the interests of the workforce as a whole and the Company customer base.</p> <p>In the event that the Company makes a decision to outsource a function or acquire or transfer a business or part of a business the Company and the third party with whom the Company is seeking to transact each have a legitimate interest in ensuring that the workforce, employee costs and liabilities are sufficiently understood prior to committing to the transaction and to ensure a smooth transition of employees if a transaction goes ahead.</p> <p>Business change programmes and transformation support business continuity and improvement and support the Company in achieving its long-term business goals and outcomes.</p>
s)	For business operational and reporting documentation such as management and headcount reporting, the preparation of annual reports or tenders for work or client team records including the use of photographic images;	Y		Y	<p>The Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring each employee undertakes appropriate duties and undertaking normal business operations.</p>

Ref	Purpose for processing	Necessary for Performance of Contract	Necessary to comply with a Legal Obligation	Legitimate Interest	What is the Company's Legitimate Interest
t)	To operate the relationship with third party customer and suppliers including the disclosure of relevant vetting information in line with the appropriate requirements of customers to those customers, contact or professional CV details or photographic images for identification to clients or disclosure of information to data processors for the provision of services to the Company;	Y		Y	<p>The Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring each employee undertakes appropriate duties and undertaking normal business operations.</p> <p>This includes the sharing of appropriate information with existing and prospective customers and suppliers about who is or will be working with them in order to develop strong relationships and support the effective performance of commitments with customers and suppliers.</p> <p>In some cases this may also include supporting customers and suppliers to comply with their legal or regulatory obligations or security requirements by having sufficient information about those providing services to them.</p>

					The Company also has a legitimate interest in ensuring that it can engage with customers and suppliers effectively and that they can access the information they need to provide the service for which they have been engaged.
u)	Where relevant for publishing appropriate internal or external communications or publicity material (including photographic images) via the Company Intranet, social media and other publicity and communication channels in appropriate circumstances;	Y		Y	<p>The Company has a legitimate interest in communicating effectively with its workforce, customers, its audience and other stakeholders as well as carrying out appropriate business development activity.</p> <p>That includes giving information to the workforce or, where appropriate customers, our audience, other stakeholders or the wider market about relevant business activities, plans or projects. That can include making reference to those of our employees who are involved in the relevant matters being communicated above.</p> <p>Effective employee, and other stakeholder communication and engagement contributes to attraction and retention of high calibre employees, development and retention of customer relationships, audience engagement and participation, strong business performance, business growth and maintaining and enhancing the Company's reputation. This supports the Company's immediate and long-term business goals and outcomes.</p>

Ref	Purpose for processing	Necessary for Performance of Contract	Necessary to comply with a Legal Obligation	Legitimate Interest	What is the Company's Legitimate Interest
v)	To support HR administration and management and maintaining and processing general records necessary to manage the employment, worker or other relationship and operate the contract of employment or engagement;	Y	Y	Y	The Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring that each employee undertakes appropriate duties, is properly trained and undertakes their roles correctly and in accordance with appropriate procedures; managing employee absence and leave entitlements; undertaking normal business operations; maintaining a dialogue with employees; and complying with applicable laws and regulations.
w)	To change access permissions;	Y	Y	Y	The Company considers it has a legitimate interest in managing its workforce and operating its business. The IT function is essential to ensuring this can be carried out in the most effective way including complying with the Company policies and access controls.

x)	To provide technical support and maintenance for HR information systems;	Y	Y	Y	The Company considers it has a legitimate interest in managing its workforce and operating its business. The IT function is essential to ensuring that this can be carried out in the most effective way including maintaining the integrity and security of data and facilitating records management.
y)	To enforce our legal rights and obligations, and for any purposes in connection with any legal claims made by, against or otherwise involving you;	Y	Y	Y	The Company considers it has a legitimate interest in protecting its organisation from breaches of legal obligations owed to it and to defend itself from litigation. This is needed to ensure that the company's legal rights and interests are managed appropriately.
z)	To comply with lawful requests by public authorities (including without limitation to meet national security or law enforcement requirements), discovery requests, or where otherwise required or permitted by applicable laws, court orders, government regulations, or regulatory authorities (including without limitation data protection, tax and employment), whether within or outside your country;	Y	Y	Y	The Company considers it has a legitimate interest in ensuring that it complies with all legal requirements placed on it, whether those are EU or non-EU obligations. The Company wishes to maintain its reputation as a good corporate citizen and to act appropriately in all the countries in which it does business. This includes cooperating with authorities and government bodies. Indeed, the Company is required to comply with laws and regulations in those countries in which it does business and to require otherwise would lead to conflicts of laws issues.
aa)	Production and exploitation of audio-visual programming for commercial purposes, including retaining the programme and your personal data in it in our archive, for the purpose of repeating the programme or otherwise using it for commercial purposes			Y	The Company has a legitimate interest in producing audio visual programming for commercial exploitation, as such "off-screen" contributions from individuals are crucial to this production activity and require the processing of personal information about these individuals.
bb)	Other purposes permitted by applicable laws, including legitimate interests pursued by the Company where these are not overridden by the interests or fundamental rights and freedoms of employees.				

Employee special category data

Ref	Purpose for processing	Lawful basis
a)	Assess and review eligibility to work for the Company in the jurisdiction in which you work.	This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws. In particular the requirement to check that you are legally permitted to work in your jurisdiction.
b)	The collection of statistical data subject to local laws, or where required to record such characteristics to comply with equality and diversity requirements of applicable local legislation or to keep the Company's commitment to equal opportunity under review.	This processing is necessary for (i) the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws and (ii) the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained.
c)	Compliance with employment, health and safety or social security laws. For example, to provide statutory incapacity or maternity benefits, avoid breaching legal duties to you, to ensure fair and lawful management of your employment, avoid unlawful termination of your employment, to administer the Company's benefits and remuneration related to health, sickness absence and long-term incapacity, to make reasonable accommodations or adjustments and avoid unlawful discrimination or dealing with complaints arising in this regard.	<p>This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws.</p> <p>To the extent that this data is managed by our occupational health advisers or third-party benefit providers, this processing is necessary for the purposes of preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, to the extent permitted by applicable laws.</p>
d)	Management and investigation of any complaint under the Company's internal policies, including its disciplinary, grievance, bullying and harassment/dignity at work and whistle-blowing policies (or other relevant policies), where such characteristics or information are relevant to the particular complaint, in order to comply with employment law obligations.	<p>This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws.</p> <p>In particular employment laws relating to the effective management of complaints and avoiding unlawful dismissals, anti-discrimination laws and our duty of care to employees.</p>

Data subject rights

What are my data subject rights and how can I use them?

As a data subject you have lots of control over the information that we hold on you, these rights and how to use them are explained below. If you have any questions, need more information or guidance please contact hr@twofour.co.uk or privacy@twofour.co.uk.

Access to my data

You can request access to the information we hold on you with some limited exceptions and we will also tell you;

- why we are processing it;
- who are we sharing it with and if any information is transferred to a country not deemed to have adequate protections in place for personal data;
- how long will we be keeping your data;
- the source of the information, if it was not collected directly from you;
- if we are using your data for automated decision making or profiling.

If you are making a request for a copy of your personal data that we are processing, please be as specific as possible as this will both help us to identify the information more quickly and provide you with a copy without any undue delay.

Rectifying inaccuracies

If you feel the information we hold on you is inaccurate, you can ask us to correct or update it.

Right to be forgotten

You can also request that we erase your information, although that might not always be possible if doing so means we cannot perform our contract with you, or we have a legal obligation or legitimate interest to keep the data. We will explain the consequences of erasing your data.

Restrict the processing

If you feel we are processing your information unlawfully or with inaccurate data, you can ask us to restrict processing. Where Personal Information is subjected to restriction in this way we will only process it with your consent or for the establishment, exercise or defence of legal claims unless we have your consent. If the processing is restricted we will continue to store the data.

Object to the processing

If you disagree with any legitimate interest or public interest we have relied upon to process your data, you can object to the processing. We will then stop processing the data unless we can demonstrate a compelling legitimate ground that overrides your rights, or the processing is required to establish, exercise or defend a legal claim.

Data Portability

Where we are relying upon your consent or the fact that the processing is necessary for the performance of a contract to which you are party as the legal basis for processing, and that personal data is processed by automatic means, you have the right to receive all such personal data which you have provided to the Company in a structured, commonly used and machine-readable format, and also to require us to transmit it to another controller where this is technically feasible. We have produced a standard format of commonly used employee data for this purpose.

Make a complaint

We are committed to safeguarding your data and upholding your rights, but if you feel we have not done that, please contact us at privacy@twofour.co.uk. Additionally you have the right to complain to the relevant supervisory authority, which in the UK is the Information Commissioner's Office (ICO).

Please contact hr@twofour.co.uk or privacy@twofour.co.uk if you want any of the information above or want your rights further explained.