



EMPLOYEE AND ADDITIONAL WORKER PRIVACY NOTICE

This notice explains how Channel Four Television Corporation (referred to in this notice as **Channel 4, we** or **us**) collects and uses information about existing and former employees, and additional workers for employment or work-related purposes. The term **additional worker** includes freelancers, agency staff and contractors.

This notice covers the following:

- Contact details
- What is personal information?
- How do we collect personal information?
- What information do we collect?
- How do we use your information?
- What happens if you do not provide information that we request?
- How do we keep your information secure?
- When do we transfer your information overseas?
- For how long do we keep your information?
- Your rights in relation to your information

The table at the end of this notice provides an overview of the data that we collect, the purposes for which we use that data, the legal basis which permits us to use your information and the rights that you have in relation to your information.

We keep this privacy notice up to date, so if there are any changes to the way in which your personal information is used this privacy notice will be updated and we will notify you of the changes.

Contact details

Our contact details are as follows:

Email: Employees: HRdataprotection@channel4.co.uk

Additional Workers: Your Channel 4 Engaging or Line Manager

Channel 4 has appointed a data protection officer who has responsibility for advising Channel 4 on its data protection obligations. You can contact the data protection officer using the following details: dataprotection@channel4.co.uk

What is personal information?

Personal information is any information that tells us something about you. This could include information such as name, contact details, date of birth, medical information and bank account details.

How do we collect personal information?

We collect personal information about you from various sources including:

- from you when you contact us directly through the application and recruitment process or during your employment or provision of services to us
- from other people when we check references or carry out background checks – if we do this we will inform you during the recruitment process of the exact checks that are carried out
- we also collect information about work-related activities.

What information do we collect?

Where relevant, we will collect the following categories of information about you:

- Personal contact details such as name, title, address, telephone number and personal email addresses
- Date of birth
- Gender
- Nationality
- National insurance number
- Bank account details, payroll records and tax status information
- Start and end date of employment/appointment
- Location of workplace
- Employment records (including job titles, work history, working hours, training records and professional memberships)
- CCTV footage other information obtained through electronic means such as swipecard records
- Photographs
- Information about criminal convictions and offences committed by you

If you are a member of staff at Channel 4 (rather than an additional worker) we also collect the following information:

- Salary, annual leave, pension and benefits information
- Recruitment information (including copies of right to work documentation, references and other information in your CV or cover letter or otherwise provided as part of the application process)
- Information about bonuses or other compensation paid to you
- Performance information (including appraisals)
- Disciplinary and grievance information
- Copy of your driving licence, car insurance details and MOT information if you use your own car or hire a car on company business
- Marital status and dependents
- We take a copy of your passport to confirm eligibility to work.
- Next of kin and emergency contact information
- Information about your race or ethnicity, religious beliefs, gender, disability, sexual orientation.
- Social Mobility
- Information about your health, including any medical condition, health and sickness records

How do we use your information?

We use your information for the following purposes:

Purpose	Channel 4 employee	Freelancer/ Additional worker
To make decisions about your recruitment and appointment	✓	✓
To determine the terms on which you work for us	✓	✓
To check you are legally entitled to work in the UK	✓	X
To pay you and, if we are legally required to do so, to deduct tax and national insurance contributions	✓	✓
To provide benefits to you, including buying and selling holiday, life assurance, private medical insurance, employee/partner critical illness cover, employee/partner health screen, dental insurance, bike to work, gymflex, childcare vouchers, travel insurance, tastecard, health cashplan.	✓	X
To liaise with your pension provider and receive information back from them to provide retirement and financial modelling facilities	✓	X
To administer the contract we have with you	✓	✓

Purpose	Channel 4 employee	Freelancer/ Additional worker
For business management and planning purposes, including accounting and auditing	✓	✓
To conduct performance reviews, manage performance and determine performance requirements	✓	X
To make decisions about salary reviews and bonuses and to assess your qualifications for a particular job or task, including decisions about promotions	✓	X
To gather evidence for possible grievance or disciplinary hearings	✓	X
To make decisions about your continued employment or engagement	✓	✓
To make arrangements for the termination of our working relationship	✓	✓
For education, general training and development	✓	X
For compliance training	✓	✓
To deal with legal disputes involving you or other employees, workers or contractors, including accidents at work	✓	✓
To ascertain your fitness for work	✓	X
To manage sickness absence	✓	X
To comply with health and safety obligations	✓	✓
To prevent fraud	✓	✓
To conduct data analytics studies to review and better understand employee retention and attrition rates	✓	X
To carry out equal opportunities monitoring	✓	✓

What is the legal basis that permits us to use your information?

Under data protection legislation we are only permitted to use your personal information if we have a legal basis for doing so. We rely on the following legal bases to use your information:

- Where we need information to perform the contract we have entered into with you
- Where we need to comply with a legal obligation
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests

In more limited circumstances we may also rely on the following legal bases:

- Where we need to protect your interests (or someone else's interests)
- Where it is needed in the public interest or for official purposes

The table at the end of this notice provides more detail about the information that we use, the legal basis that we rely on in each case and your rights.

Some information we collect is classified as "special" data under data protection legislation. This includes information relating to health, racial or ethnic origin, religious beliefs or political opinions and sexual orientation. This information is more sensitive and we need to have further justifications for collecting, storing and using this type of personal information. There are also additional restrictions on the circumstances in which we are permitted to collect and use criminal conviction data. We may process special categories of personal information and criminal conviction information in the following circumstances:

- In limited circumstances with your explicit consent, in which case we will explain the purpose for which the information will be used at the point where we ask for your consent
- We will use information about your physical and mental health or disability status to comply with our legal obligations, including to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits
- We will use information about your race or ethnic origin, religious or philosophical beliefs, your sexual life or sexual orientation to ensure meaningful equal opportunity monitoring and reporting – the legal basis of this processing is that it is in the public interests to carry out diversity monitoring

What happens if you do not provide information that we request?

We need some of your personal information in order to perform our contract with you. For example, we need to know your bank details so that we can pay you. We also need some information so that we can comply with our legal obligations. For example, we need information about your health and fitness to work to comply with our health and safety obligations.

How do we share your information?

We share your personal information in the following ways:

- Where we use third party services providers who process personal information on our behalf in order to provide services to us. This includes IT systems providers and IT contractors, payroll providers and pension administration providers and benefit providers.
- We will share anonymised and summary reporting information with regulators, including Ofcom where we are required to do so to comply with our regulatory obligations. This will not usually include information in a form that can be linked to you.
- We will share your personal information with third parties where we are required to do so by law. For example, we are required to provide tax-related information to HMRC. Channel 4 is also subject to the Freedom of Information Act therefore we may have to disclose anonymised and non-identifiable information (for example, role and salary range) in response to a Freedom of Information Act request. There will be some occasions where we may have to provide identifiable personal information in response to a Freedom of Information Request.
- If we sell any part of our business and/or integrate it with another organisation your details may be disclosed to our advisers and to prospective purchasers or joint venture partners and their

advisers. If this occurs the new owners of the business will only be permitted to use your information in the same or similar way as set out in this privacy notice.

Where we share your personal information with third parties we ensure that we have appropriate measures in place to safeguard your personal information and to ensure that it is solely used for legitimate purposes in line with this privacy notice.

How do we keep your information secure?

Your personal information is stored on secure servers that are further secured by the use of Permissions and Active Directory Security groups. The HR team has its own secure specific folder for personal information. Special data (including medical information and diversity data) that is held on the HR secure specific folder is further restricted to certain HR staff. This is also monitored using a forensic analysis tool that alerts us to any unusual behaviour.

When do we transfer your information overseas?

When data is transferred to countries outside of the UK and the European Economic Area those countries may not offer an equivalent level of protection for personal information to the laws in the UK. Where this is the case we will ensure that appropriate safeguards are put in place to protect your personal information.

The countries to which your personal information is transferred and the safeguards in place are detailed below:

One of our service providers, Silkroad, stores encrypted back up tapes of personal data in a secure service in Canada. Canada has been recognised by the European Commission as having data protection laws that provide adequate protection. You can find out more about transfers of data outside the EEA and the European Commission adequacy decision for Canada on the European Commission Justice website:

https://ec.europa.eu/info/law/law-topic/data-protection_en

For how long do we keep your information?

As a general rule we keep your personal information for the duration of your employment, appointment or contract for services and for a period of six years after your contract ends. However, where we have statutory obligations to keep personal information for a longer period or where we may need your information for a longer period in case of a legal claim, then the retention period may be longer.

Your rights in relation to your information

You have a number of rights in relation to your personal information, these include the right to:

- be informed about how we use your personal information
- obtain access to your personal information that we hold
- request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate
- request that we erase your personal information in the following circumstances:
 - if Channel 4 is continuing to process personal data beyond the period when it is necessary to do so for the purpose for which it was originally collected
 - if Channel 4 is relying on consent as the legal basis for processing and you withdraw consent

- if Channel 4 is relying on legitimate interest as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us to continue with the processing
 - if the personal data has been processed unlawfully (i.e. in breach of the requirements of the data protection legislation)
 - if it is necessary to delete the personal data to comply with a legal obligation
- ask us to restrict our data processing activities where you consider that:
 - personal information is inaccurate
 - our processing of your personal information is unlawful
 - where we no longer need the personal information but you require us to keep it to enable you to establish, exercise or defend a legal claim
 - where you have raised an objection to our use of your personal information;
 - request a copy of certain personal information that you have provided to us in a commonly used electronic format. This right relates to personal information that you have provided to us that we need in order to perform our agreement with you and personal information where we are relying on consent to process your personal information
 - object to our processing of your personal information where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal information.

If you would like to exercise any of your rights or find out more, please contact HRdataprotection@channel4.co.uk. The table at the end of this notice provides more detail about the information that we use, the legal basis that we rely on in each case and your rights.

Complaints

If you have any complaints about the way we use your personal information please contact HRdataprotection@channel4.co.uk and we will try to resolve the issue. If we cannot resolve your complaint, you have the right to complain to the Information Commissioner.

Quick check of Channel 4's use of your personal information

In the table below we provide an overview of the main purposes for which Channel 4 uses your personal information, the types of data used for those purposes, the legal basis which allows us to use your data and your rights that apply. Some rights apply in all circumstances. We call these "**generally applicable rights**". The generally applicable rights are as follows: right to be informed about how your personal data is used, right of access, right to rectification, right to erasure, right to restriction and rights in relation to automated decision making. Depending on the legal basis that we are relying upon you sometimes have some additional rights. Where this is the case, we have explained this in the table below. Please see the "Your rights in relation to your information" section above for more details about these rights and how to exercise them.

All workers (including employees and additional workers):

Purpose	Data used	Legal basis	Which rights apply?
Recruitment decisions	CV, Answers to Applicant Filter Questions, Answers provided to questions or presentations as part of the interview process.	Legitimate interest. It is in Channel 4's interest to ensure it recruits the best possible candidates in order to achieve its goals and objectives	The generally applicable rights plus the right to object
Right to work checks	Passport and Work Permit	Legal obligation - The law on preventing illegal working is set out in sections 15 to 25 of the Immigration, Asylum and Nationality Act 2006 (the 2006 Act) and sections 24 and 24B of the Immigration Act 1971	The generally applicable rights only
Administration of your contract including payment of amounts we owe to you	Name, address, bank details, tax code, NI Number	Contractual necessity – Channel 4 needs to use this information to fulfil our responsibilities under your contract	The generally applicable rights plus the right to data portability
Compliance with our statutory duties to ensure a safe place of work and to ensure that you are fit for work	Name, medical health questionnaire.	Legal obligation - Health & Safety at Work Act.	The generally applicable rights only
To monitor compliance with our policies	Personal contact details, information about your use of our information and communication systems, CCTV footage and other information obtained through electronic means such as swipecard records, disciplinary and grievance information and performance information	Legitimate interest - it is in Channel 4's legitimate interest to ensure employees are complying with our policies as non-compliance of policies can affect our operations and business plans and our ability to comply with our legal obligations	The generally applicable rights plus the right to object
Fraud and crime prevention	Information that is held about you that may be relevant to a criminal investigation.	Public interest and legitimate interest - it is in both Channel 4's and the interests of the public to ensure that appropriate measures are taken to prevent and detect fraud and crime.	The generally applicable rights plus the right to object
Diversity monitoring	Information about gender, sexuality, religion, ethnicity, social mobility data and nationality.	Legal obligation – we have obligations to ensure that we are operating in accordance with the requirements of the Equality Act 2010.	The generally applicable rights only

Purpose	Data used	Legal basis	Which rights apply?
To deal with legal disputes	Details of the incidents, meeting outcomes, attendees.	Legitimate interest - it is in Channel 4's interests to process personal data to make and defend legal claims to ensure that Channel 4's legal rights are protected	The generally applicable rights plus the right to object

Channel 4 employees only:

Purpose	Data used	Legal basis	Which rights apply?
Photographic identification for security passes and for use on the staff intranet	Photograph	Legitimate interest – it is in Channel 4's legitimate interests to ensure that only known personnel are permitted to access its premises. Photographic identification enables security guards to verify the identity of individuals entering buildings. It is also in Channel 4's legitimate interests to include photographs on the intranet to facilitate communications between staff and to enable staff to identify one another more easily.	The generally applicable rights plus the right to object
Performance reviews and appraisals, salary reviews and promotion decisions	Review of objectives and feedback on outcomes of objectives. Salary Reviews - based on performance reviews and comparable job roles. Promotion Decisions - internal interview outcomes and review of capability to undertake the role.	Contractual necessity – Channel 4 needs to process this information in order to fulfil our responsibilities under your contract of employment	The generally applicable rights only
Management of sickness absence	Name, dates of absence and reason for absence	Legal obligation and contractual necessity – we need to process this information to fulfil our statutory requirements in relation to sick pay and to fulfil our responsibilities under your contract of employment	The generally applicable rights plus the right of data portability
Disciplinary and grievance procedures	Name, date of any incident or meetings. Information about the situation, outcomes, attendees etc.	Legitimate interests - it is in Channel 4's legitimate interests to manage the performance of employees and ensure that disciplinary action is taken where appropriate	The generally applicable rights plus the right to object
Business management and business planning	Role information, occupant names, headcount and salary information.	Legitimate interest - it is in Channel 4's interests to undertake this processing to ensure they can improve any business operations which will ultimately improve the overall quality of work/work place. Employees will ultimately benefit as the workplace and its	The generally applicable rights plus the right to object

Purpose	Data used	Legal basis	Which rights apply?
		procedures may be strengthened	
Exit management at the end of your employment	Name, leaving date, reason for leaving, exit interview	Legitimate interest - it is in Channel 4's interests to undertake exit management steps to ensure the employees can express any feedback to Channel 4 which Channel 4 can consider and decide whether to implement to improve the workplace for other employees	The generally applicable rights plus the right to object

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