



ITV People Privacy Notice

Introduction

Your personal information is very important to us and we look after it carefully in line with privacy and data protection laws, including the UK General Data Protection Regulation (UK GDPR), the EU General Data Protection Regulation (GDPR) and any other applicable national 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 Privacy Notice

- is for anyone carrying out work for ITV, including: employees; freelancers; or contractors (including contractors engaged to provide services e.g., sole traders, and individuals providing services via limited companies, partnership or personal service companies; and individuals engaged by outsourced services providers e.g. cleaning/security/catering contractors; agency workers) referred to in this Privacy Notice as ITV colleagues
- describes the categories of personal information we may process, how your personal information may be processed and how your privacy is safeguarded
- is intended to comply with our obligations to provide you with information about the Company's processing of your personal information under privacy laws
- doesn't form part of your contract of employment or your freelance contract or other contract for work / services etc (as applicable) and
- should be read alongside any supplemental privacy notices you may receive from the Company, including, where applicable, specific local privacy notices.

We may update this Privacy Notice from time to time and will notify you when any material changes are made. This Privacy Notice was last updated March 2024.

The Company is committed to protecting the security of your personal information. To support this, we've taken appropriate technical, physical and organisational measures to make sure the level of security is appropriate to the risk of it being compromised. Our policies covering our *Code of Ethics & Conduct*, *ITV Policy for Processing Special Category & Criminal Offence data*, *Acceptable Use* and other policies which may contain more detailed information about how ITV may use your personal data are available on myITV, or on request from your line-manager or HR.

More detail on the ITV People Privacy Notice:

- [Who is the Company?](#)
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Who is the Company?

Any reference to "we", "us", "our" and "the Company" is to the relevant member of the ITV plc group of companies acting as your "data controller". A data controller is an organisation which decides how and why your personal information will be used (or 'processed').

The ITV company identified in your employment contract or contract of engagement will be your main data controller. In addition, where processing of personal data is undertaken by other members of the ITV group, these associated companies may also be controllers of your personal information.

You can contact us at myprivacy@itv.com for more information about how we process your personal information, including how to exercise your rights as a "data subject" (a person whose personal information we use).



How does the Company collect personal information?

Information collected from you

The Company collects your personal information from a variety of sources, but mainly directly from you. If you are an employee, you will usually provide this information directly to your manager, HR team or enter it into our systems (for example, during the recruitment process, through direct access to our HR and onboarding systems, your participation in HR processes or emails you send).

If you are a contractor or freelancer, you may provide this information directly to the Company or production/project team contact through being considered for assignments, or during our contracting, onboarding and payment processes, or emails and CV's which you send to the Company in the course of your engagement on a production or project, or an unsolicited CV for potential future engagements. You may also elect to send us updated versions of your CV from time to time ("Updated CVs").

For agency workers and individuals engaged by outsourced service providers we may receive data directly from the relevant agency or service provider, as well as from you.

You may also provide your personal information as part of your day-to-day activities while working with ITV such as emails, chats or other communications. Further information about you will come from your hiring manager, line manager, primary ITV contact, or the HR team.

Information collected from third parties

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

Information collected through automated means

Any usage of Company systems, devices, telephones, email, chat, internet and other communication facilities or tools may be subject to monitoring in compliance with law, Company policies and best practice. For example, ITV (or its authorised advisors or agents) may monitor ITV colleagues' usage: for legitimate business purposes; to prevent, detect or investigate suspected illegal conduct, wrongdoing or other misuse; to ensure that customers and other business contacts are being appropriately responded to; to comply with legal obligations; or to locate and retrieve lost messages or files. In the case of employees, sometimes we may need to check colleagues' email accounts or voicemail during their absence from work (e.g. when an ITV colleague is on holiday or sick leave).

ITV's offices may use CCTV and you may be recorded when working from our premises. Email, chat, voicemail messages, recordings and internet usage are potentially subject to interception and to disclosure to third parties in the course of litigation or an investigation. We have a legitimate basis on which to access and protect company data stored or processed on a device, including the content of any communications sent or received from the device. However, we recognise the need to balance our obligation to process personal information for legitimate purposes, with your expectations of privacy in respect of your personal information. For more information, please refer to the Acceptable Use Policy (which may be updated from time to time).

Where the collection of information is mandatory

When 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 by law, this will be indicated. Failure to provide any mandatory information may 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 or engagement 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.

Information you provide about third parties

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 (if applicable) 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 personal information you intend to provide to the Company and the processing carried out by the Company, as detailed in this Privacy Notice.

What personal 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, feedback, health data etc. The types of personal information we process in the context of your employment or engagement with the Company are set out below.

Types of Personal Information

The types of personal information we collect about you will depend on the nature of your engagement with us. For all types of ITV colleague, we may collect:

- *Basic information about you:* your title, forename, middle name(s) and surname, birth name, preferred name, any additional names, gender, gender identity, 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, information required to make any reasonable adjustments, any information you disclose to your line-manager in your accessibility passport, preferred contact details for celebrations and special occasions;
- *Data related to your engagement with the Company:* work contact details (e.g. address, telephone number, email), work or office location (including when you are working from home), default hours, default language, time zone and currency for location, worker or employee number and various system IDs, appraisal information or feedback, work biography, reporting line, employee or worker type, hire/contract start and end dates, cost centre, job title and description, working hours and patterns; 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;
- *Data created during the course of your engagement with the Company:* any personal data created by you during the course of your engagement, or about you, such as emails, chats or other forms of communication when used in a work context or for work purposes;
- *Recruitment and talent pool 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 pay, pension schemes, bank account details, job level, social security number, tax information, union contributions, expenses;
- *Leave information:* absence records (including dates and categories of leave/time off), holiday dates;
- *Data relating to Company, Production or Project processes:* health and safety audits, risk assessments, incident reports, call sheets, contacts lists, organising travel and hotel bookings, insurance cover, contact details and location of place of work for purposes of notifying colleagues of an emergency event;
- *Monitoring data (to the extent permitted by applicable laws):* closed-circuit television (CCTV) footage, system and building login and access records, download and print records, data caught by IT security programmes and filters;
- *Supporting the ITV technology estate* - personal contact details, browsing history, data stored on laptops, home ISP provider details, sound recording for training and quality purposes, further details are included in the Acceptable Use Policy.
- *Equality and diversity data* - where permitted by law and provided voluntarily, or in the case of ITV's productions, perceived diversity characteristics, data regarding ethnicity, sex, gender/gender identity, age, race, nationality, disability, carer status, religious belief, community background, socio-economic background and sexual orientation. See also the section below on Special categories of personal information.
- *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 list, organising travel and accommodation and/or insurance cover.

- *Data relating to claims, complaints and disclosures data* - termination arrangements and payments, litigation and complaints, colleague involvement in incident reporting and disclosures, including as part of ITV's speaking up policy or other complaints procedures, information provided as part of insurance claims.

If you are an employee (so not a freelancer or other type of worker), we may also collect the following additional information:

- *Remuneration and benefits data*: including one-off payments, allowances, bonus and incentive plans, pension schemes, participation in benefits provided by third parties;
- *Leave information*: information related to family leave;
- *Employee claims, complaints and disclosures data* - (as above) where the subject matter is relevant to your status as an employee.

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

If you are a member of an ITV pension scheme then the Trustees of that scheme are the relevant data controller and will send you a separate privacy notice.

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".

As set out in the list above, this includes information relating to such matters as racial or ethnic origin, religious beliefs, physical or mental health (including details of adjustments or accommodations), sexual orientation, criminal records and information regarding criminal offences or proceedings. For employees, this may also include certain maternity/adoption information.

Purposes for Processing Personal Information

In general, the processing of your personal information is necessary to perform the contract of employment or engagement 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 commercial or operational interests pursued by the Company, except where such interests are overridden by your interests or fundamental rights and freedoms.

Where you are eligible, this processing also enables us to provide you with various benefits and to manage and administrate your employment or engagement and where applicable to consider you for future assignments within the Company.

Please see the list of processes that may use your personal information, including the purpose and the lawful basis of each process set out in the "Purposes and Lawful Basis" section of this Privacy Notice. 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 personal information (or sensitive personal data)**, as described above. This information will only be processed where it is necessary and data protection law allows this using a specific lawful justification, under one of the following bases:

- Where explicit consent has been given; or
- 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 (including such laws which also apply to workers), 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 public interest reasons permitted by law, for example 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.

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. ITV will process this data in compliance with the ITV Policy for Processing Special Category & Criminal Offence data or other relevant policy.

You should be aware that it's not a condition or requirement of your employment or engagement 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.

For more information, please see the Purposes and Lawful Basis section below.

Who has access to my personal information?

Your personal information can be accessed by or may be disclosed 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 if you are an employee, involved in an HR process concerning your relationship with the Company, or involved in managing the relationship between the Company and its third party service providers;
- Production or project teams (if engaged as a Freelancer/Contractor) and hiring managers;
- System administrators and system maintenance teams in the Company such as Finance, Technology, HR, Systems, Reporting teams;
- Legal and compliance and CyberSecurity teams and their external advisors and agents; and
- Other ITV colleagues (where there is a legitimate reason for sharing this data in accordance with ITV's policies and procedures).

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 ITV colleagues via the Company's intranet. Where required, certain other information such as your home location may be accessible to other ITV colleagues with operational responsibilities via Company systems.

Your personal information will only be shared with third parties where necessary, such as:

- Service providers acting on ITV's behalf to help manage or run HR processes, including to provide cloud hosted software used to support these processes. Such service providers include providers of onboarding/offboarding, providers of invoice management services and providers of outsourced services such as whistleblowing hotline and engagement survey providers, covid-19 testing companies, travel providers and training services. In the case of employees this may also include providers of payroll, pay review and bonus



administration, referencing, benefits, pensions and benefits. These service providers generally act as the Company's 'data processors', meaning that they can only process your personal information on the Company's instruction to provide the relevant HR related service.

- Professional advisors and independent service providers such as the Company's insurers, bankers, lawyers, auditors, consultants and other professional advisors. These parties use your personal information to provide professional or financial services to the Company and to comply with their own regulatory responsibilities. These third parties generally act as data controllers in their own right, and therefore their processing of your personal information will be subject to their own privacy notices. If you have questions about how one of these third parties has used your personal information please contact us in the first instance and we can refer you to them as appropriate.
- Insurance companies, where necessary to pursue or defend a claim under or in connection with an insurance policy.
- Potential and actual investors in the Company and any actual or prospective purchaser of the Company or its assets, as well as its advisors in each case, in order to make a decision about whether to invest in or acquire the Company or its assets.
- Regulators, law enforcement agencies, government bodies and courts, in order to comply with legal obligations, assist with regulatory enquiries, law enforcement investigations or other inquiries where we determine there is a legitimate interest in doing so, and to comply with court orders or to assist with the public interest in helping the courts to administer legal proceedings. 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. 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 personal information transferred?

Your personal information is mainly processed within the UK or 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 the categories of third party set out above for the purposes described in this Privacy Notice. This may also include transfer of your personal information for the purposes of any international secondments or assignments.

IT maintenance and incident support for some of our systems is outsourced to a company in India. Their support staff have administrative access and are able to access data and also use resources from other territories including Argentina, Canada and the USA to resolve issues as quickly as possible. Access is controlled via a privileged access management tool and can be revoked by ITV at any time.

As a result, your personal information may be transferred to countries whose data protection laws may be less stringent than in your home country. Where this is the case, the Company will ensure that appropriate or suitable safeguards are in place to protect your personal information or that the transfer is otherwise 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 or other international data transfer agreements as approved by the European Commission, the Information Commissioner's Office, or any 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 intra-group or to third parties please contact myprivacy@itv.com.

The Company may also make occasional transfers of your personal information without the need to provide an appropriate level of protection, where permitted by data protection laws. For example, where transfers are necessary to establish, exercise or defend legal claims, or where there is an important public interest reason to transfer the data.

How long does the Company keep my personal information?



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 ITV's Retention Schedule and that data is deleted as soon as reasonably practicable thereafter.

To perform our contractual obligations and comply with applicable laws, we generally retain your information for the duration of your employment or engagement plus a further six years. 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. To find out more about applicable retention periods please contact HR.

In the case of contractors, each updated CV which you send us will be retained by us for 4 years and can be accessed by our Hiring Managers and Production or Project Teams, in consideration for future engagements within the Company. You have a right to ask for your CV to be deleted from our records, and can do so by contacting myprivacy@itv.com. We will endeavour always to refer to the most up to date version of your CV when considering you for future engagements.

For agency workers or individuals engaged by outsourced services providers we will retain your personal information whilst you are providing services to the Company and for 6 months thereafter. We will only retain your personal data for longer than this if necessary to do so, in which case we will apply the principles set out in our Retention Schedule and ensure that data is deleted as soon as reasonably practicable thereafter.

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

In law you are the data subject and, as a result, you have several rights that you can exercise over your personal information; such as the right to access, correct, and request to delete your personal information, data portability, restricting the processing or objecting to it if it 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.

Read more on your rights and how to use them in the "Data Subject rights" section below or contact myprivacy@itv.com.

Purposes and lawful basis

Sometimes the types of personal information we collect about you will depend on the nature of your engagement with us. The tables below set out ITV's purposes for personal data processing together with their lawful basis, based on whether you are an employee, freelancer or contractor.

Processing activities that apply to ITV colleagues

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	The Company considers it has a legitimate interest in fully assessing applications for employment, freelance engagements, contractor assignments and talent pools 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 for employees and freelancers, identity fraud checks, criminal record checks (if and to the extent permitted by applicable laws), relevant engagement history, relevant regulatory status and professional qualifications;		Y	Y	In addition to applicable legal obligations, 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. In some cases we are required by law to conduct vetting e.g. right to work checks.
c)	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 ITV colleague undertakes appropriate duties; undertakes their role correctly in the case of employees and freelancers; in accordance with appropriate procedures, and in undertaking normal business operations.
d)	Identifying and communicating effectively with colleagues, including where required to alert colleagues to an emergency;	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 ITV colleagues.

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
e)	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 or engager to receive confirmation of engagement details from the Company for the purposes of confirming the former ITV colleague's engagement or employment history.
f)	Operating email, IT, internet, social media and other 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 legitimate business purpose or required by law, where applicable;		Y	Y	<p>In addition to applicable legal obligations, 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.</p> <p>This includes putting in place appropriate policies and procedures for measuring compliance, detecting breaches and taking action if they are not complied with.</p> <p>The Company is also required by law to ensure its systems and data is kept secure.</p>
g)	Satisfying its regulatory obligations to supervise the persons employed, engaged, 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	In addition to applicable legal obligations, the Company considers it has a legitimate interest in ensuring that its business, clients, ITV colleagues and systems are protected including detecting and preventing crimes or criminal activity; ensuring only appropriate ITV colleagues are engaged in our business; and ensuring compliance with export control and other legal requirements placed upon us (both by UK and non-UK laws).

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
h)	Protecting the private, confidential and proprietary information of the Company, ITV colleagues, its clients and third parties;		Y	Y	In addition to applicable legal obligations, the Company considers it has a legitimate interest in ensuring that its business, clients, ITV colleagues 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.
i)	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	The Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring each ITV colleague undertakes appropriate duties and undertaking normal business operations.
j)	To operate the relationship with third party customers 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 ITV colleague 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> <p>The Company also has a legitimate interest in ensuring that it can engage with customers and suppliers</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
					effectively and that they can access the information they need to provide the service for which they have been engaged.
k)	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	<p>The Company considers it has a legitimate interest in communicating effectively with its workforce, customers, its audience and other stakeholders; managing and communicating with its workforce and operating its business including ensuring that our colleagues undertake appropriate duties and undertake normal business operations; 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.</p> <p>That can include making reference to those of our ITV colleagues who are involved in the relevant matters being communicated above.</p> <p>Effective communication with ITV colleagues and other stakeholder communication and engagement contributes to attraction and retention of high calibre ITV colleagues, 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
l)	To support administration and management and maintaining and processing general records necessary to manage the ITV colleague relationship and operate the contract of employment, engagement, or services;	Y	Y	Y	In addition to applicable legal obligations, the Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring that each ITV colleague undertakes appropriate duties, is properly trained and undertakes their roles correctly and in accordance with appropriate procedures; managing employee or freelancer absence and leave entitlements; undertaking normal business operations; maintaining a dialogue with ITV colleagues and complying with applicable laws and regulations.
m)	To change access permissions;	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.
n)	To provide technical support and maintenance for information systems;	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.
o)	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	In addition to applicable legal obligations, 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.

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)	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	<p>In addition to applicable legal obligations, 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.</p> <p>In some cases the purpose of this type of processing may be in the public interest.</p>
q)	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.
r)	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 colleagues.				

Special category personal information for ITV colleagues

Ref	Purpose for processing	Lawful basis
a)	<p>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.</p>	<p>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; (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; or, where neither (i) nor (ii) is applicable, (iii) your explicit consent</p>
b)	<p>Compliance with employment, health and safety or social security laws. In the case of all ITV colleagues, for example, to avoid breaching legal duties to you, make reasonable adjustments, and avoid unlawful discrimination or dealing with complaints arising in this regard.</p> <p>In the case of employees, to provide maternity benefits; ensure fair and lawful management of your employment and avoid unlawful termination of your employment and administer the Company's benefits and remuneration related to health, sickness absence and long-term incapacity.</p> <p>Additionally, in the case of freelancers, to provide statutory benefits if applicable.</p> <p>Finally, in the case of contractors, to ensure fair and lawful management of your assignment;</p>	<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>
c)	<p>Management and investigation of any complaint under the Company's internal policies, where such characteristics or information are relevant to the particular complaint, in order to comply with employment law obligations.</p> <p>For employees, this includes 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>	<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 all colleagues.</p>

Processing activities that apply to employees only

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)	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	In addition to applicable legal obligations, 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.
b)	Training, development, promotion, career, talent management and succession planning and business contingency planning;	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.
c)	Consultations or discussions with representatives of employees;	Y	Y	Y	In addition to applicable legal obligations, 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.
d)	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	Y	Y	Y	In addition to applicable legal obligations, 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. The Company considers that it has a legitimate interest in managing health and safety risk and operating its

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
	regarding employment or engagement or continued employment or engagement or redeployment; and conduct related management processes;				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. 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.
e)	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	In addition to applicable legal obligations, 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.

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
f)	<p>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;</p>		Y	Y	<p>In addition to applicable legal obligations, 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>

Processing activities that apply to freelancers only

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)	Processing information about absence or medical information regarding physical or mental health or condition in order to: assess eligibility for statutory benefits if applicable, make adjustments or accommodations to duties or the workplace; make management decisions regarding engagement or continued engagement;	Y	Y	Y	In addition to applicable legal obligations, the Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring each freelancer undertakes appropriate duties and undertakes their roles correctly and in accordance with appropriate procedures and managing absence and leave entitlements. The Company considers that it has a legitimate interest in managing and supporting its workforce, managing health and safety risks and operating its business. This includes taking steps to identify and mitigate risks to freelancers or other workers' health, safety or welfare and ensuring that where required appropriate adjustments are made to working conditions.
b)	Training;	Y		Y	The Company considers it has a legitimate interest in managing its workforce and operating its business including ensuring that each freelancer undertakes appropriate duties, undertakes mandatory training and undertakes their roles correctly and in accordance with appropriate procedures.

Processing activities that apply to employees and freelancers

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)	Monitoring programmes to ensure equality of opportunity and diversity with regard to personal characteristics protected under applicable anti-discrimination laws;		Y	Y	In addition to applicable legal obligations, the Company considers it has legitimate interests in ensuring that it takes action to prevent discrimination and promote an inclusive and diverse workplace.

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
b)	<p>Conducting statutory reporting and surveys for benchmarking and identifying improved ways of working these will often be anonymous but may include profiling data such as age and gender to support analysis of results);</p> <p>Additionally, in the case of employees, conducting statutory reporting and surveys for employee relations and engagement at work;</p>		Y	Y	<p>In addition to applicable legal obligations, the Company considers it has a legitimate interest in managing its workforce and operating its business. This includes ensuring that each colleague undertakes their roles correctly and in accordance with appropriate procedures; undertaking normal business operations, and maintaining a dialogue with colleagues. In the case of employees, ensuring they are properly remunerated and that this remuneration is set to an appropriate level and complying with applicable laws and regulations. In the case of freelancers, ensuring they are paid and complying with applicable laws and regulations.</p> <p>If you are an employee, then the Company has a legitimate interest in seeking the views of its workforce and giving them the opportunity to raise concerns or suggest improvements.</p> <p>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.</p>

Special category personal information for employees and freelancers

Ref	Purpose for processing	Lawful basis
a)	Assess and review eligibility to work for the Company in the jurisdiction in which you work.	<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 the requirement to check that you are legally permitted to work in your jurisdiction.</p>

Processing activities that apply to freelancers and contractors

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)	Talent pools			Y	The Company considers it has a legitimate interest in retaining the details of freelancers and contractors in talent pools and sharing the details with other production teams within the Company so that these individuals can be considered for future engagements or assignments the Company is recruiting for. The Company understands that this is the expectation of the freelance and contractor communities and enables these individuals to be hired more frequently, which we believe is in their interest and to their benefit.

Processing activities that apply to contractors only

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)	Payment;	Y		Y	The Company considers it has a legitimate interest in managing its workforce and operating its business, including ensuring that contractors, agencies and service providers are paid and in undertaking normal business operations.
b)	Security measures on site;	Y		Y	The Company considers it has a legitimate interest in ensuring that the Company knows which individuals are on site, on location or working on its services to ensure appropriate security measures are taken.

Data subject rights

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

As a data subject you have rights related to the information that we hold about you, these rights and how to use them are explained below. If you have any questions, need more information or guidance please contact myprivacy@itv.com.

Access to my personal information



You can request access to the personal information we hold about 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 personal information is transferred to a country not deemed to have adequate protections in place;
- how long will we be keeping your personal information;
- the source of the personal information, if it was not collected directly from you;
- if we are using your personal information for automated decision making or profiling.

If you are making a request for a copy of the personal information 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 personal 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 personal 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 personal information. We will explain the consequences of erasing your personal information.

Restrict the processing

If you feel we are processing your personal information unlawfully or with inaccurate information, 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 personal information.

Object to the processing

If you disagree with any legitimate interest or public interest we have relied upon to process your personal information, you can object to the processing. We will then stop processing the information 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 information is processed by automatic means, you have the right to receive all such personal information 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 myprivacy@itv.com. Additionally you have the right to complain to the relevant supervisory authority, which in the UK is the Information Commissioner's Office (ICO) at <https://ico.org.uk/>

We have appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or want your rights further explained, please contact the DPO or the Data Privacy Team please contact myprivacy@itv.com.

Version Number	Date	Changes Made	Comments/status
1	25 May 2018	New Employee Notice	published
2	Jan 2023	Update	published
3	Jan 2024	Annual review - consolidation of 3 notices (employees, freelancers and contractors) into 1 notice and additional clarifying updates to language and structure, including clarifying the lawful bases relied upon (specifically reducing the number of bases where not relevant to the processing activity).	Reviewed by People & Data Group and published March 2024