

Appropriate Policy Document that sets out how Banijay UK protects Special Category and Criminal Convictions Personal Data

This is the 'appropriate policy document' for all companies within the Banijay UK group of companies (BUK) that sets out how we will protect special category and criminal convictions personal data.

It meets the requirement at paragraph 1 of Schedule 1 to the Data Protection Act 2018 that an appropriate policy document be in place where the processing of special category personal data is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection.

It also meets the requirement at paragraph 5 of Schedule 1 to the Data Protection Act 2018 that an appropriate policy document be in place where the processing of special category personal data is necessary for reasons of substantial public interest. The specific conditions under which data may be processed for reasons of substantial public interest are set out at paragraphs 6 to 28 of Schedule 1 to the Data Protection Act 2018.

1. Procedures for securing compliance

Article 5 of the General Data Protection Regulation sets out the data protection principles. These are our procedures for ensuring that we comply with them.

1.1 Principle 1

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.

BUK will:

- ensure that personal data are only processed where a lawful basis applies and where processing is otherwise lawful
- only process personal data fairly and will ensure that data subjects are not misled about the purposes of any processing
- ensure that data subjects receive full privacy information so that any processing of personal data is transparent

1.2 Principle 2

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

BUK will:

- only collect personal data for specified, explicit and legitimate purposes and we will inform data subjects what those purposes are in a privacy notice

- not use personal data for purposes that are incompatible with the purposes for which it was collected. If we do use personal data for a new purpose that is compatible, we will inform the data subject first

1.3 Principle 3

Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

BUK will only collect the minimum personal data that we need for the purpose for which the data are collected. We will ensure that the data we collect are adequate and relevant.

1.4 Principle 4

Personal data shall be accurate and, where necessary, kept up to date.

BUK will ensure that personal data are accurate and kept up to date where necessary. We will take particular care to do this where our use of the personal data has a significant impact on individuals.

1.5 Principle 5

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

BUK will only keep personal data in identifiable form as long as is necessary for the purposes for which the data are collected, or where we have a legal obligation to do so. Personal data shall be deleted or rendered permanently anonymous once we no longer need the data.

1.6 Principle 6

Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

BUK will ensure that there appropriate organisational and technical measures in place to protect personal data.

2. Accountability principle

Each company or department within BUK who is the controller of particular personal data shall be responsible for and be able to demonstrate compliance with these principles. The relevant company Director / Head of Production and relevant Head of Legal & Business Affairs and/or Head of Department is responsible for ensuring that each company or department is compliant with these principles.

We will:

- ensure that records are kept of all personal data processing activities, and that these are provided to the Information Commissioner on request
- carry out a Data Protection Impact Assessment for any personal data processing that is likely to result in a high risk to data subjects, and consult the Information Commissioner if appropriate
- ensure that the relevant company Director / Head of Production and relevant Head of Legal & Business Affairs and/or Head of Department monitors the departments' or company's personal data handling, and that this person has access to report to the highest management level of EUSK
- have in place internal processes to ensure that personal data are only collected, used or handled in a way that is compliant with data protection law

3. Data controller's policies as regards retention and erasure of personal data

We will ensure, where special category or criminal convictions personal data are processed, that:

- there is a record of that processing, and that record will set out, where possible, the envisaged time limits for erasure of the different categories of data
- where we no longer require special category or criminal convictions personal data for the purpose for which the data were collected, the data will be deleted or rendered permanently anonymous
- data subjects receive full privacy information about how their data will be handled, and that this will include the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period

4. Further information

For further information about BUK 's compliance with data protection law, please contact us:

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