



Privacy Policy

1. About Hello Dolly Limited

Hello Dolly Limited ("Hello Dolly", "we", "us" or "our") is an independent television production company based in the United Kingdom that makes programmes and other content for broadcasters and platforms around the world.

Hello Dolly's registered office is at 39 Long Acre, London, WC2E 9LG

Hello Dolly is committed to protecting the privacy of others and complying with all relevant data protection laws and regulations. This Privacy Policy sets out how Hello Dolly collects and uses information during production of programmes and other content that we produce (collectively '**Content**') and individuals who are involved in the creation of such Content such as;

- 1.1 individuals who progress onto featuring in the Content ("**Contributors**")
- 1.2 individuals who audition or enquire about featuring in the content but do not progress onto featuring in the Content ("**Applicants**")
- 1.3 individuals who visit www.hellodolly.tv ("**Website**")
- 1.4 individuals who contact us with any queries

collectively ("**You**")

Please contact Hello Dolly if you have any questions or concerns at: casting@hellodolly.tv

2. How do we collect personal information?

We collect personal data from a variety of sources such as:

- **from you directly** when you contact us, when you complete an application form or when you feature in our Content. This includes photographs and images that you provide to us for illustrative purposes in connection with your participation in Content.
- **from information we generate about you during our relationship with you** such as: footage and recordings, technical data collected from cookies and other similar technologies which are described in our Cookies Policy when you use our Website; and
- **from information we collect about you from third parties** such as: talent agencies, our third party service providers who assist us such as for ID verification purposes, DBS checks and social media checks. This may include publicly available sources too, such as social media.

3. What personal information will we collect and why?

We will, are likely, or may process the following information about you in connection with our business activities and the Content we produce, which we may obtain from you directly or from a third party:

- 3.1 **Personal and contact information:** such as your name, your gender, your age and date of birth, your address and contact details such as your email address and telephone number, your handwriting, as well as other basic details about you such as your banking details. We need this information to correspond with you and to contract with you and for administrative and other purposes.
- 3.2 **Identification documents:** such as your image, your gender, your age and birth date, information contained within your passport, your driving licence and possibly other official documents which

identify you. We need this information to check your identity and to ensure compliance with relevant laws and regulations.

- 3.3 **Personal life information:** such as about your past and present personal, home and family life. We need this information to be able to assess your suitability to take part in Content and to comply with our contractual and regulatory obligations.
- 3.4 **Professional life information:** such as about your past and present professional life including information about your current role and work schedule, your previous work history, your qualifications and your experiences. We need this information for administrative purposes, to be able to assess your suitability to take part in Content and to comply with our contractual and regulatory obligations.
- 3.5 **Release information:** such as whether you consent or object to being identified in Content and if you object, the basis of your objection. We need this information to assess your suitability to take part in Content and to comply with our contractual and regulatory obligations.
- 3.6 **Social media and public information:** such as about you that is on social media and the internet including images of you and other personal information that is contained there. We need to process this information in order to verify your identity and to assess your suitability to take part in Content.
- 3.7 **Health information:** such as information concerning your physical and mental health. We need this information in order to assess your suitability for participation in Content we produce, and for compliance with contractual obligations we have to third parties, who are subject to statutory regulation.
- 3.8 **Criminal record check:** such as information concerning any criminal convictions or cautions you may have, information about any criminal activity you may be or have been involved in and information concerning current criminal proceedings or criminal allegations relating to you or in which you are involved. We need this information in order to assess your suitability for participation in Content; and for compliance with contractual obligations we have to third parties, who are subject to statutory regulation.
- 3.9 **Diversity information:** such as your age, gender, gender identity, ethnicity, disability and sexual orientation. We will use this information for diversity analysis monitoring.
- 3.10 **Unaired and aired footage and sound recordings:** such as any and all personal information revealed or recorded on cameras and/or microphones and contained within footage and/or sound recordings made for Content (or provided by a third party to us in connection with Content) including your image and voice and potentially a very wide range of personal information relating to you revealed by you and/or others including without limitation:
 - 3.10.1 your name; your gender; your age and date of birth; your address and contact details; information about your past and present personal, home and family life; information about your financial affairs; information about your past and present professional life including information about your current job, your position, work schedule and the nature of your work, your previous work history, your qualifications and your experiences and the details of any legal claim made by or against you and enforcement action taken against you or on your behalf, including any assets seized and the circumstances surrounding the seizure.
 - 3.10.2 information concerning your racial and ethnic origin, political opinions, religious or philosophical beliefs, your membership of a trade union, your health and any medical treatment you receive, your sex life or your sexual orientation (“special category data”); and

- 3.10.3 information concerning any criminal convictions or cautions you may have and any other criminal activity you may have been suspected of or involved in; information concerning the nature and status of any arrests, charges, prosecutions, court proceedings or other interactions between you and the authorities (“criminal convictions and offences data”).
- 3.11 We need this information for editorial reasons and for the production of Content, for contractual reasons and obligations we have to third parties, and/or to comply with our obligations to you pursuant to our contract with you.
- 3.12 **Contributor-supplied illustrative photographs:** such as personal photographs and images that you voluntarily provide to us prior to or during the production of Content. These photographs are used purely for illustrative purposes within the Content. For example, to illustrate a personal story or experience relevant to a prize or feature being filmed. Prior to each filming session, we may speak with you to discuss stories and experiences relevant to the Content and may request that you supply photographs to accompany those stories. The images you supply may be broadcast as part of the Content. We need this information for editorial and production reasons, and to enhance the storytelling and entertainment value of the Content we produce.
- 3.13 **Technical information** collected from your device when you are browsing on our Website, Platform, or our digital communications such as emails. This includes: your IP address, your location (by country, state and city), device type, browser type, operating system, interaction with, and responses to, our marketing communication and activity on our Website. Please see our cookies policy for more information.
- 3.14 **Correspondence** between you and us such as: by email, Website and social media.
- 3.15 **Other:** any other information you voluntarily provide
- 4. Lawful bases for processing personal information**
- 4.1 Your personal data may be used by us for the following purposes and lawful bases.
- 4.2 The first column of the following table refers to the types of personal information set out in the numbered paragraphs above. The second column lists the lawful bases we rely upon in order to process these types of personal information for the purposes noted in those paragraphs.
- 4.3 Please note if you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as allowing feature in our content), or we may be prevented from complying with our legal obligations (such as to ensure safety).

Purpose	Types of information we may use	Lawful basis
Contacting you about taking part, and assessing your suitability to take part in Content that we produce	• Personal and contact information • Identification documents • Personal life information • Professional life information • Information from third parties • Social media and publicly available information • Health information • Criminal record check • Correspondence • Other information you voluntarily provide	Article 6(1)(b): Performance of a contract or steps prior to entering into one with you; Article 6(1)(f): Legitimate interests such as ensuring that you are suitable for inclusion in Content, including verifying your identity, assessing your professional and personal background, and meeting audience expectations. Article 9(2)(g): Substantial public interest;

		Article 9(2)(a): explicit consent for criminal record checks. DPA 2018 Schedule 1, Part 2, Paragraph 10 (Preventing or detecting unlawful acts), Paragraph 16 (Support for individuals with a particular disability or medical condition), Paragraph 18 (Safeguarding of children or individuals at risk) Paragraph 19 (Safeguarding of economic well-being of certain individuals).
As part of and in connection with our Content-making	• Personal and contact information • Personal life information • Professional life information • Information from third parties • Social media and publicly available information • Unaired and aired footage and sound recordings • Contributor-supplied illustrative photographs • Correspondence • Other information you voluntarily provide	Article 6(1)(b): Performance of a contract or steps prior to entering into one with you Article 6(1)(f): Legitimate interests: creating high-quality Content to be distributed and consumed by the public, ensuring the Content reflects real-life stories and experiences, and preserving editorial freedom and integrity.
Producing, exhibiting, exploiting, distributing, publicising, advertising and promoting our Content by any media (now known or hereafter invented) throughout the world	• Personal and contact information • Personal life information • Professional life information • Information from third parties • Social media and publicly available information • Unaired and aired footage and sound recordings • Contributor-supplied illustrative photographs • Correspondence • Other information you voluntarily provide	Article 6(1)(b): Performance of a contract or steps prior to entering into one with you Article 6(1)(f): Legitimate interests: Promoting and distributing Content globally to maximise its audience reach and commercial value, and to fulfil obligations to broadcasters, platforms, and other distribution partners.
Operating and managing our business effectively and lawfully	• Personal and contact information • Identification documents • Diversity information • Correspondence • Technical information • Other information you voluntarily provide • Information from third parties	Article 6(1)(c): Legal obligations Article 6(1)(f): Legitimate interests: Efficiently managing the day-to-day operations of the business, ensuring compliance with regulatory requirements, and maintaining workplace equality and diversity. Article 9(2)(g): Substantial public interest; DPA 2018 Schedule 1,

	Publicly available information	Part 2, Paragraph 8 (Equality of Opportunity or Treatment).
Responding to queries from you	- Personal and contact information - Technical information - Other information you voluntarily provide - Information from third parties - Publicly available information	Article 6(1)(b): Performance of a contract or steps prior to entering into one with you Article 6(1)(f): Legitimate interests: Providing clear and timely responses to queries to maintain a positive reputation and foster goodwill.
To monitor and improve your experience on our Website, and digital communications (e.g., emails).	- Personal and contact information - Correspondence - Technical information - Information from third parties - Publicly available information - Other information you voluntarily provide	It is in our legitimate interest to monitor user behaviour to improve and personalise your experience on our Website, Platform and digital communications as well as . to conduct research, analytics and measure performance in relation to the running of our business, Website and Platform so that we can understand any issues. We rely on your consent to deploy non-strictly necessary cookies and similar technologies. You have the right to withdraw consent at any time.

5. The Special Purposes – public interest journalism

Please note that the UK GDPR and DPA 2018 state that in certain circumstances we do not have to comply with some aspects of data protection law (including this privacy policy) if we believe that doing so would be ‘incompatible’ with journalism and/or artistic purposes (i.e. it would stop us from doing our job as a producer of Content), data is being held with a view to publication, and there is a public interest in publication. This is known as the ‘special purposes exemption’.

We may process your personal data under the special purposes exemption in connection with Content.

6. Consent and contract

Generally, we anticipate that individuals agree to take part in and work on Content that we produce. However, we may refer to or even feature an individual in Content without their consent provided we comply with the relevant laws and regulatory codes, such as the Ofcom Broadcasting Code and have a lawful basis for doing so.

Where you have entered into a contract with us to participate in Content, we may be entitled to distribute and show the relevant Content whether or not you later change your mind about participation.

Consenting to take part in Content via a contract, and our reliance on your consent to process your personal data, are two distinct, different things. We will not generally rely on your consent to process your personal data if you appear in Content. This is something which we normally do as part of our legitimate business interests, for contractual purposes and/or in connection with public interest journalism.

Where we do rely upon 'consent' to process your personal information, you have the right to withdraw your consent at any time, although please note that we may be relying on other lawful bases at the same time.

7. Sharing your personal information

Your personal information is processed by our employees and staff. Sometimes we use third parties who are contractually engaged to provide services to us that may involve the sharing of personal information in order to provide such services. for example:

- Companies that help us: such as our third-party ID verification partners to verify your identity and we receive confirmation of a successful ID verification, with a DBS check and social media check results. This is on the basis of our legitimate interests and of third parties, to carry out our services.
- Our professional advisers: including IT services, legal and accountancy services that assist us in carrying out our business activities in our legitimate interests.
- companies involved with our business activities e.g. broadcasters, SVOD platforms, post-production houses, sales agents, distributors;
- broadcasting regulators e.g. Ofcom;
- Group companies and other companies we work closely with: for security, assistance, improving our Content, and reporting, based on our legitimate business interests.
- In the context of a transaction: we may share your personal data with potential partners and other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell or transfer all or a portion of our assets or business. This is on the basis of our legitimate interests for our business operations and the legitimate interests of third parties such as those in connection with the transaction.
- Government authorities, courts, law enforcement, fraud prevention agencies, the police or other regulatory bodies as required by law in connection with the investigation of crimes. This is on the basis of our legitimate interests for the establishment, exercise or defence of legal claims to protect our business or in compliance with applicable legal obligations where we believe it is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of a third party.

8. INTERNATIONAL TRANSFERS

Although we are based in the UK, our business is global and so we may need to transfer your personal information outside the UK.

Wherever your information is transferred to organisations outside the UK, we will ensure that appropriate safeguards are in place to protect personal information as required by data protection laws. Such safeguards include: standard data protection clauses, legal exceptions, adequacy decisions, recognised frameworks (e.g. the EU-US Data Privacy Framework). If you are located in the UK or the EEA, you may contact us for a copy of the safeguards. How we store your personal information

We have implemented appropriate measures to ensure that your personal information is kept safe and secure e.g. by storing it securely, and by keeping electronic data on secure servers and hard drives with appropriate levels of security including encryption and firewalls. However, the internet is an open system and we cannot guarantee that unauthorised third parties will never be able to defeat those measures.

We will only keep your personal information for as long as we need to in line with our retention criteria taking into consideration: legal obligations, best industry practice, limitation periods, our business needs and for the establishment, exercise or defence of a legal claims. For those participating in our programmes, we are likely to retain your personal information for as long as is necessary in order to produce, exhibit, exploit, distribute, advertise, publicise and promote the programme in accordance with our legitimate interests and legal obligations. Personal information that is no longer required will be deleted/destroyed.

9. Your rights

You have a number of rights in respect of your personal information, including the right to object to and or restrict our processing of your personal data and the right to request:

- access to the personal information that we hold about you;
- that we do not process your personal information for direct marketing purposes;
- that inaccurate personal information we hold about you is corrected;
- that personal information is deleted;
- that your personal information is provided to you in a portable format.

Please note that most of these rights are not absolute and are limited to certain defined circumstances. Accordingly, we may not be able to comply with any such request.

If the basis of our processing of your personal information is 'consent' you have the right to withdraw your consent at any time without affecting the lawfulness prior to the withdrawal of your consent. However, note that your data may also be being processed subject to another lawful basis as set out above.

10. Getting in touch

We encourage you to raise your concerns directly with us so that we can address them through our internal complaints escalation procedure. To do so, please contact us if you have any questions or concerns regarding your personal data, at casting@hellodolly.tv. If you remain dissatisfied after this process, you may escalate the matter to us. We are committed to resolving any concerns promptly and transparently.

Thereafter, you may also contact the Information Commissioner if you have concerns about the way in which your personal data has been processed by Hello Dolly: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. <https://ico.org.uk/make-a-complaint/>

11. Changes to this Privacy Policy

We may update or amend this Privacy Policy from time to time by posting this policy on our Website.

Hello Dolly Limited

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