

# Hi IMPACT

## COMPANY PRIVACY POLICY

The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR). It is originally a European Union privacy law that controls how your personal information is used by organisations, businesses and the government.

Your privacy and security of your personal information are of the highest importance to us. This privacy policy explains what personal information Hi Impact collects about you, what we do with that information and your rights.

Hi Impact takes responsibility as the 'data controller' of the personal information we collect from and about you.

### 1.WHO WE ARE?

Hi Impact Media Limited, Hi Productions Limited, Hi Impact MENA Events Organizing LLC and Hi Media Mena Holdings Limited (together "Hi Impact"), a company founded by former BBC News and Current Affairs producers to help stream online events to the same quality and standard as major broadcasters.

Our registered address is First Floor, Albion Mills, 18 E Tenter St, London E1 8DN, United Kingdom. Hi Impact is a registered company with registration number 13400821.

If you have any questions about this privacy policy, including a request to exercise your legal rights, please email us at [hi@hi-impact.studio](mailto:hi@hi-impact.studio) with the subject line 'GDPR'.

### 2.DEFINITIONS AND KEY TERMS

- Cookies: means small text files which our website places on your computer's hard drive to store information such as activity on our website. When you visit the website again, the cookie allows that site to recognise your browser. Cookies may store your preferences and other information
- Personal data: means any information that identifies you or that could identify you either alone or when combined with other information
- Processing: means anything that is done to, or with, personal data (including simply collecting, storing or deleting those data)
- Special category personal data: this is personal data which, due to its sensitive nature, Hi Impact is under additional obligations when processing, and includes:
  - personal data revealing racial or ethnic origin;
  - personal data revealing political opinions;
  - personal data revealing religious or philosophical beliefs;
  - personal data revealing trade union membership;
  - genetic data;
  - biometric data (where used for identification purposes);
  - data concerning health;
  - data concerning a person's sex life; and
  - data concerning a person's sexual orientation.
- We/us: means HI Impact Ltd
- Website: means the website located at <https://www.hi-impact.studio/>

### **3. INFORMATION WE COLLECT, PROCESSING WE UNDERTAKE AND LEGAL BASIS FOR PROCESSING**

#### **3.1 FOR EMPLOYEES, CONTRACTORS AND FREELANCERS**

##### **3.1.1 WHAT DATA DO WE COLLECT?**

Hi Impact will collect your personal data directly from you and from other sources as required to recruit, employ and manage you. This may include, but not exclusively, your: CV, references, citizenship and immigration status, ID documentation, financial information, criminal record information, financial information, performance information, health information (and possibly other special categories of personal data), or any information that can be associated or related to the person or could be used to identify the person the data is collected from.

##### **3.1.1.1 SPECIAL CATEGORY / SENSITIVE PERSONAL DATA**

There are some situations where we will need to process sensitive information in connection to other activities of Hi Impact, for example if you are an employee and have an accident whilst working for us or if you tell us about a disability. If we record your sensitive personal data, we will take extra care and follow additional procedures to ensure your privacy rights are protected. Our legal basis for collecting sensitive personal data in these instances will usually be so that we can fulfil legal obligations or to fulfil a contract with you.

##### **3.1.2 HOW DO WE COLLECT YOUR DATA?**

Information will be collected directly from you and also recruitment companies, government agencies and background screening agencies, other employers and people able to provide references, and from online and public sources, such as Companies House, social media profiles etc.

Information that you provide voluntarily

We may process and store information that you have provided voluntarily. For example, when you give us your business card or contact details. It will be clear to you at this point what personal data you are providing.

##### **3.1.3 HOW DO WE PROCESS YOUR DATA**

We will process your personal data to meet the obligations of the employment contract, satisfy legal obligations and also to meet the legitimate interests of Hi Impact, such as performance assessment, undertake investigations, security of buildings, to provide access to buildings and systems, monitoring the use of systems for data security purposes etc, organising travel, visas, accreditation to events, insurance cover etc as part of your employment or contribution to a project, contacting next of kin in an emergency, processing payroll or invoices, reviewing a CV as part of your suitability to a role within the company

##### **3.1.4 WHO WILL HAVE ACCESS TO YOUR DATA AT HI IMPACT?**

All personnel associated with your project, employment or involvement at Hi Impact may have access to selected personal information such as your name, address, phone number, email address.

Other data will be shared internally with members of the recruitment, HR, operations and payroll teams, your line manager, other senior managers of the organisation. Only that information which is necessary to enable us to fulfil our duties is shared.

## **3.2 FOR RECRUITMENT**

### **3.2.1 WHAT DATA DO WE COLLECT?**

When you apply for a role by submitting your CV (or similar employment information) to us, whether directly or through an agency, or are interviewed by us, we will collect your personal data.

This may include:

- Name and contact details (address, mobile phone number and email address)
- Date of birth and gender
- Work history and employment positions held
- Salary, other compensation and benefits information
- Nationality / visa / right to work permit information
- Academic and professional qualifications, education and skills
- Copies of your passport and/or other identity card / photographs.
- Demographic information
- Any other information you choose to give us
- Records we create during interviews or correspondence with you
- Results of pre-employment screening checks

We may collect some sensitive personal data about you, such as disability information. We will only do this to make reasonable adjustments to enable candidates to apply for jobs with us, attend interviews and to start work with us if successful. Also, to ensure we meet our legal obligations when recruiting.

We also collect your personal data from third parties including former employers (for reference purposes) and background screening providers. We don't collect anything you wouldn't expect us to collect and we will not collect any personal data we do not need.

### **3.2.2 HOW DO WE COLLECT YOUR DATA?**

Information will be collected directly from you and also recruitment companies, and background screening agencies, other employers and people able to provide references, and from online and public sources, such as Companies House, social media profiles etc.

The collection of this data does not form part of any contract of employment or other contract to provide services.

### **3.2.3 HOW DO WE PROCESS YOUR DATA**

We will process your personal data to meet the obligations, satisfy legal obligations and also to meet the legitimate interests of Hi Impact for the purposes of administering your job application, assessing your candidacy for a role, communicating with you and contacting third party references.

We will also process your personal data to manage our talent pool of potential candidates by retaining contact details (name, telephone, email and CV) of job applicants that were unsuccessful. By submitting your application, you are confirming your consent to us processing your personal data for these purposes.

You can withdraw your consent and/or object to being in our talent pool at any time, by contacting us – see 'contact section' below

### **3.2.4 WHO WILL HAVE ACCESS TO YOUR DATA AT HI IMPACT?**

Your data will be shared internally with members of the recruitment and HR team, the hiring manager, and interview panel members. Only that information which is necessary to enable us to fulfil our duties is shared.

### **3.3 FOR WEBSITE USERS**

We do not collect data from any visitors to our website; [https://www.hi- impact.studio/](https://www.hi-impact.studio/) unless you make direct contact with us via the contact page. In this instance, we may store your name, email address and any other details provided in the body of the email or email signature.

Once we have received your data via the contact box, we will use appropriate procedures and security features in accordance with the General Data Protection Regulation (2018) to protect your privacy.

Hi Impact does not use cookies on their website.

On some occasions, we may provide links to third party websites that are not operated on our behalf. When this is the case, we will notify you that you are leaving our Website and entering a website operated by a third party. In these circumstances, any personal data that you may submit to the third party's website will be processed in accordance with the third party's privacy policy. Our site may also have "plugins" (such as Facebook "like button") through a third party website. These and similar features are also governed by the third party's privacy policy.

## **4.ALL**

### **4.1 WHO WILL WE SHARE YOUR DATA WITH?**

We will never sell your personal data.

We may share data, including personal data, with our third-party vendors who may need to have access to your personal data for the purpose of providing services to us. We do not permit our third party service providers to use any personal data that we share with them for their own marketing purposes or for any other purposes other than in connection with the services they provide to us, unless you have provided your consent for them to do so.

In some circumstances, our third party service providers may collect your personal data on our behalf. When our service providers collect your personal data on our behalf, we ensure that they enter into contracts which only permit them to process your personal data in accordance with our instructions and this Privacy Policy.

You should be aware that our service providers may ask you for your consent to send you marketing and other information about other events and services ("Third-Party Marketing"). If you do provide your consent to third party marketing, you should be aware that your personal data will be processed by that third party in accordance with their privacy policy (and not the Hi Impact Privacy Policy). You should read their privacy policy and ensure that you are comfortable with how they may use your personal data before providing your consent.

Your personal data may also be shared with those that commission us for work. This would include copies of consent forms and other personal data of those involved in that work.

We may also share your personal data with third parties if we are required to do so by law or contract, to respond to legal process, to protect our customers or staff, to protect lives, with your consent, to complete a transaction, or to protect the rights or property of Hi Impact.

We may also share your personal data if it is necessary to:

- comply with applicable law or respond to valid legal processes, including from law enforcement or other government agencies. For example, on occasion we may disclose CCTV footage to the police

## **4.2 HOW DO WE STORE YOUR DATA?**

Information from you and about you may be stored digitally and physically. We maintain appropriate safeguards, procedures and technology in order to keep your personal data secure and also require that third parties we choose to process your personal data do the same. Strict technical security measures are taken to ensure our servers and your digital data are safe. We have personnel and physical measures designed to protect personal data that are consistent with privacy and data security laws and regulations.

We control who has access to our secure electronic databases and provide training on our data protection policies and procedures. We also check these are being followed.

## **4.3 HOW LONG DO WE KEEP YOUR DATA?**

Hi Impact will keep your personal data for as long as is considered necessary for the purpose(s) for which it was collected and that we have a legal or regulatory obligation to keep it. In doing so, we:

- review the length of time we keep your personal data;
- consider the purposes for which we hold the personal data in deciding whether (and for how long) to retain it;
- securely delete personal data that is no longer needed for those purposes; and
- update, archive or securely delete personal data if it goes out of date.

We have set destruction limits, taking into account legal rules, your rights and our needs and have a continuous programme that securely destroys your personal data when we have reached the relevant time limit.

Hi Impact will securely destroy or delete the personal data or anonymize it once it is no longer required in line with their Data Retention Policy and procedure.

## **5. WHAT ARE YOUR DATA PROTECTION RIGHTS?**

Hi Impact would like to make sure you are fully aware of all of your data protection rights.

### **5.1 YOUR RIGHTS**

Under the Data Protection Act 2018, you have the right to find out what information Hi-Impact stores about you. These include the right to:

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

- Your right to withdraw consent - If the lawful basis for processing is consent, you have the right to withdraw that consent at any time. Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for
- Your right to object to - Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.

You also have the right to object to and not to be subject to a decision based solely on automated processing including profiling. We do not carry out automated processing or profiling. More information can be found at the website of the [Information Commissioner's Office](#).

## **5.2 ACCESS TO INFORMATION**

You can find out if we hold your personal data and ask for a copy of it by making a 'subject access request'.

If we do hold personal data about you, we will:

- confirm your identity (request a copy of your passport/ID card) before sending you any data
- let you know what personal data is being held or used and why
- let you know who we have shared your personal data with
- give you a copy of the personal data you request in electronic form
- provide any other relevant information including how long we will hold your personal data for and how to correct inaccurate information that is held by us.

If you make a request for amendments to your personal data, we have one month to respond to you.

In certain circumstances, for example particularly complex or multiple requests, we may take a further two months to provide the data. In this case, you would be informed of the reason for the delay within one month of your request.

Requests for information are usually free. However, in some circumstances, i.e if large amounts of information have been requested, it may be necessary to charge an admin fee.

## **6. TRANSFER OF INFORMATION OUTSIDE OF EU**

The GDPR Data Protection Act 2018 safeguards the personal data of EU citizens whether they are based within the EU or further afield. Even when transferred abroad for work purposes the regulation applies to non-EU companies dealing with EU citizens.

A list of member states is available here: [https://europa.eu/european-union/about-eu/countries/member-countries\\_en](https://europa.eu/european-union/about-eu/countries/member-countries_en)

Due to the global nature of Hi Impact's work it may be necessary to disclose personal information to third parties providing services outside of the European Union. When personal data is transferred outside of the UK for the purposes of day to day operational activity of Hi Impact (e.g. because a cloud based solution is based abroad), we will make sure that there are adequate levels of protection in place as required under the GDPR. This may include the enactment of an international data transfer agreement as published by the Information Commissioner's office.

Hi Impact sometimes operates in jurisdictions that have limited or no data protection rights, meaning it is not possible to enter into an international data transfer agreement or take other steps to ensure safeguards to the same standard as the GDPR. There may not be a supervisory authority that Hi Impact or data subjects can raise privacy concerns with within the jurisdiction. Transfer will be minimised to the extent necessary, for example to make logistical arrangements for employees and contractors e.g. booking flights, accommodation, accreditation: Given the nature of the personal data that would be transferred in these instances Hi Impact believes that the risk of harm to data subjects is minimal.

## **7. CHANGES TO OUR PRIVACY POLICY**

We will update this privacy policy from time to time with regard to our activities and in accordance with applicable laws and regulations and will post any changes on our website. When you use our services, the latest privacy policy posted will apply so please check back regularly to ensure that you have seen our most up to date notice.

## **8. YOU ARE IN CONTROL**

Updating your information

Please let us know if your personal data is inaccurate because your details have changed (for example you have moved house). Please let us know using our contact details.

When updating your personal data by phone or email, we may ask you to verify your identity before we can act on your request.

## **9. HOW TO CONTACT US**

If you have any questions regarding Hi-Impact's privacy policy, the data we retain or you would like to exercise one of your data protection rights, please do not hesitate to contact us at [hi@hi-impact.studio](mailto:hi@hi-impact.studio)

To make a request or to exercise your legal rights, please email or send a letter headed 'Subject Access Request'.

We will respond as soon as possible (and within one month of the date of receipt of your request and the information we need to respond).

## **10. HOW TO COMPLAIN**

If you have any concerns about our use of your personal information, you can make a complaint to us at:

[hi@hi-impact.studio](mailto:hi@hi-impact.studio)

You can also complain to the ICO if you feel that Hi Impact has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office:

ICO website: <https://ico.org.uk/make-a-complaint/>

Telephone: 0303 123 1113

Textphone: 01625 545860 Monday to Friday, 9am to 4:30pm

Information Commissioner's Office Address:

Wycliffe House Water Lane,

Wilmslow

Cheshire

SK9 5AF