

# Privacy Notice

## Introduction

Christy Media Solutions is committed to ensuring that your privacy is protected. We believe successful relationships require transparency, mutual trust and understanding and the respect of individual preferences and choices.

Please read the following **Privacy Notice** and **Website Terms of Use** carefully to understand our views and practices regarding your personal data. This Privacy Notice sets out the basis on which any personal data we collect from you, collect about you from external sources or that you provide to us, will be processed by us.

## Terms of Reference:

When this Notice mentions 'Christy Media Solutions', 'CMS', or 'us', or 'we', or 'our' it refers to the data controller of your personal data under this Notice, namely Christy Media Solutions Ltd. As data controller of your personal data, we determine the way it is processed when it is supplied to us, how it may be processed in the future and what it is used for. When this Notice mentions 'you' or 'your' it refers to the data subject, namely, you, the individual who is the subject of personal data.

## Who are we and what do we do?

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). We provide global recruitment and executive search consultancy services for broadcasters, content creators & distributors, creative digital agencies, eSports, live production, OTT/VOD platforms, post-production, sports media, system integrators, technology solution providers and telco operators.

Our registered office is 4 St. Pauls Court, Stony Stratford, Milton Keynes, MK11 1LJ, United Kingdom. Christy Media Solutions is a registered company in England & Wales, No. 5338642.

## Why do we collect your personal data and how do we process it?

We collect and use your personal data to provide services to you. We do this:

- To fulfil the legitimate purposes of CMS recruitment services and resourcing activity, such as informing you about available vacancies or relating to your registration or job vacancy application or by matching your details to job opportunities
- To create your unique profile on the CMS database to aid the recruitment process (we will only record information provided by you which we consider is relevant to assist with services and obligations)
- To answer your questions and enquiries and to obtain updates from you regarding your current or future career plans

- To develop and improve CMS recruitment services, Website and other related business processes
- To assess your suitability, qualifications and skills, not only for current work assignments/vacancies but also for assignments/vacancies which we think may be of interest to you in the future
- To fulfil CMS contractual obligations arising from any contracts we intend to enter into or have entered into between CMS and you or CMS and our clients
- To fulfil CMS legal and regulatory obligations
- To keep you informed by email, telephone and/or social media about relevant future work opportunities and other marketing communications.
- To meet our legitimate interests in collecting and retaining your personal data is described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.

In order to support our candidates' career aspirations and our clients' resourcing needs we require a database of candidate and client personal data containing historical information as well as current resourcing requirements.

## **What types of personal and sensitive data do we collect?**

### **Personal Data:**

In order to aid the recruitment process we will ask you to provide your personal data by registering via our candidate portal, filling in forms on our Website [www.christy-media.com](http://www.christy-media.com) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, to enter our database, subscribe to our services, meet our consultants at exhibitions or events held by CMS. This includes, but is not limited to: full name, address, e-mail address, full CV, telephone numbers, financial information, compliance documentation, references verifying your qualifications and experience, your right to work in the United Kingdom, curriculum vitae and photograph, your work and education history, links to your professional profiles available in the public domain (e.g. LinkedIn, Twitter, Facebook), and any other relevant information you choose to provide, such as your preferences, e.g. preferred location of employment, areas of interest as well as your contact and marketing preferences.

### **Sensitive Data:**

Should we have a genuine reason to request and retain your sensitive personal data we will first explain why and then request and record your explicit consent to do so.

### **Data collected indirectly:**

There may be circumstances where we have not received your personal data directly from you and would like to retain it. This is information we obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card, and personal recommendations. In this case we will inform you, by

sending you this privacy notice, within a maximum of 30 days of collecting the data of the fact we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data.

**Cookies:**

We collect anonymous data from users of our website in the form of cookies. Please see our [Website Terms of Use](#) for further information about this.

**Consent:**

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

**How do we secure the Personal Data we collect?**

We are committed to ensuring that your personal data is secure and take all practicable steps to protect it against unauthorised access, processing, erasure, loss or use. CMS security systems and policies are regularly reviewed, and all employees receive comprehensive security and privacy training. Sending information over the internet or by email is generally not completely secure, and we can't guarantee the security of your data while it's in transit.

**Who will we share your personal data with?**

We may disclose your personal data to third parties where there is a valid and genuine need to do so; examples include:

- Employees and representatives of CMS for legitimate and relevant business purposes
- Prospective employers or engagers, including clients of CMS, (who may also retain such data for future recruitment purposes)
- Intermediaries involved in managing the supply of personnel such as Managed Service Providers engaged by clients of CMS to manage the recruitment process
- External vetting bodies e.g. to obtain criminal record checks
- Third parties who have a legitimate reason to access CMS business technology systems such as contractually engaged IT Services providers or recruiting systems providers for the purposes of technical support or development
- Any professional association, registration body, regulatory or law enforcement agency if we are required by law to do so

**We will always ask for your explicit permission before sharing your personal data with any prospective employers or third parties.**

**Do we transfer your personal data outside of the EEA?**

We are a specialist broadcast recruitment agency that works globally and therefore the data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be transferred to third parties outside of the EEA for the purpose of our recruitment services. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services and the provision of support services. CMS will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice. If such a transfer is necessary, we will only do so once we've obtained your explicit consent, and only in the context of providing our recruitment services to you. We will take all reasonable precautions necessary to ensure that data transferred outside of the EEA is treated and stored securely.

### **How long will we hold your Personal Data for?**

We will only retain and process your personal data for as long as is necessary in accordance with our legitimate interests, or for as long as we are legally obliged to do so. We will use reasonable means to ensure that your personal data is correct and up to date, however, we also rely on you to notify us of any changes to your personal data to ensure that our records are accurately maintained. It is CMS policy to contact you every 6 years to renew your consent to continue to retain your personal data. Should we not obtain this consent, we will securely delete your personal data.

### **What are your rights?**

You have many rights which enable you to control and protect your personal data.

#### **Right to be Informed**

This Privacy Notice details our obligation to provide you with 'fair processing information'. We aim to provide total transparency regarding how your data is being processed and why.

#### **Right to Access**

You have a right to access your personal data, to confirm that your data is being processed and to verify the lawfulness of our processing activities. Should you wish to exercise your right to access, this would be responded to free of charge and within one month of receipt of such request. Verification of your identity would be required to complete such a request.

#### **Right to Rectification**

If you find that any of the personal data that we hold about you is inaccurate, incomplete or contains errors, you can contact us and within one month, we will take necessary actions to make the appropriate corrections. Where your data has been disclosed to any third parties, we will also inform them of the rectification where possible and appropriate, also make you aware of the third parties to whom the rectification request has been made.

#### **Right to Erasure**

Should you feel we have no compelling reason to hold some or all your personal data,

you have the right to be forgotten. Even if we've received prior consent from you, this can be removed at any time and without prejudice. On receipt of this request, your data will be deleted without undue delay. Some exceptions may occur – for example, should the request contradict the legal or statutory obligations of CMS. Where your data has been disclosed to any third parties, we will also inform them of the erasure request and where possible and appropriate, also make you aware of the third parties to whom the erasure request has been made.

### **Right to Restriction**

You have the right to 'block' or suppress processing of personal data for many reasons, including where you are contesting its accuracy until it is verified.

### **Right to Objection**

You can object, or request to restrict, how your personal data is being processed, for example the processing personal data for direct marketing purposes. We will only send you marketing information once we have obtained your explicit consent to do so, however, should you wish to remove this consent, you can do so at any time.

### **Rights related to automated individual decision-making and profiling:**

We do not use any automated processes related to decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process.

For any matters relating to CMS' Privacy Notice or if you wish to exercise any of your rights, or make a complaint to us about how we control your personal data; you can contact us at: [consent@christy-media.com](mailto:consent@christy-media.com) or by calling +44 1908 229022. Our nominated Data Protection Manager is Deborah Cross.

In the unlikely event you are unsatisfied with any response you receive from CMS, you are within your rights to raise your concern to the [Information Commissioner's Office \(ICO\)](https://ico.org.uk) ( <https://ico.org.uk>).