



## Talent and Crew Privacy Notice

### Introduction

Your privacy and the protection of your personal data are important to Netflix. We want you to understand how and why we process your personal data. We have put together this privacy notice to help you understand how Netflix collects and uses your personal data during and after your relationship with us.

Our processing of your personal data will always be in accordance with applicable data protection laws.

This privacy notice applies to all talent and crew. We recommend you familiarise yourself with it and contact us at [netflixdpo@netflix.com](mailto:netflixdpo@netflix.com) if you have any questions.

Netflix is a "controller" in respect of personal data. This means that we are responsible for deciding how we use personal data we hold about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to all talent and crew, both during your relationship with us and thereafter. This notice does not form part of any contract to provide services. We may update this notice at any time and will inform you of any material changes.

It is important that you read this notice, together with any other privacy documents we may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using such information.

### How we will process your personal data

Netflix will only use your personal data when permitted to do so in accordance with data protection laws. Primarily, we will process your personal data in regard to the production, distribution and commercialisation of the production in which you are involved.

The purposes for which Netflix processes your personal data and the applicable lawful basis are as follows:

Purpose	Lawful Basis
<b>Management and administration of personnel:</b> including managing work activities and personnel generally, including evaluations, project management; making business travel arrangements; compilation of audit trails and other reporting tools; maintaining records relating to business activities; budgeting, financial management and reporting; communications; and monitoring activities (including the monitoring telephone, email, Internet and other Netflix resources); and conducting internal investigations	<b>Processing of your personal data is:</b> necessary for the performance of a contract to which you are a party; and/or necessary in accordance with our (or a third party's) legitimate interests and your freedoms and fundamental rights do not override those interests; necessary to protect your vital interests
<b>Payroll and benefit management:</b> including payment administration; administering and paying salary and salary reviews, wages and other awards such as stock options, stock grants and bonuses, health care,	<b>Processing of your personal data is:</b> necessary for the performance of a contract to which you are a party

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pensions and savings plans; and honouring other contractual benefits and loans	
<b>Planning and allocating work:</b> including performing workforce analysis and planning; and allocating Netflix assets and human resources	<b>Processing of your personal data is:</b> necessary for the performance of a contract to which you are a party; and/or necessary in accordance with our (or a third party's) legitimate interests and your freedoms and fundamental rights do not override those interests; necessary to protect your vital interests
<b>Human resources management:</b> including managing and administering training, leave, promotions, transfers; and managing coaching, disciplinary matters and terminations; operating and managing the IT and communications systems; and managing mergers, acquisitions and re-organizations or disposals	<b>Processing of your personal data is:</b> necessary for the performance of a contract to which you are a party; and/or necessary in accordance with our (or a third party's) legitimate interests and your freedoms and fundamental rights do not override those interests; necessary to protect your vital interests
<b>Communications (including in emergencies):</b> including facilitating communication with talent and crew; providing references; ensuring business continuity; protecting the health and safety of talent and crew and others; safeguarding IT infrastructure, office equipment and other property; and facilitating communication in an emergency	<b>Processing of your personal data is:</b> necessary for the performance of a contract to which you are a party; and/or necessary in accordance with our (or a third party's) legitimate interests and your freedoms and fundamental rights do not override those interests; necessary to protect your vital interests
<b>Compliance:</b> including complying with applicable legal and other requirements, such as income tax and national insurance deductions; recordkeeping and reporting obligations; conducting audits; compliance with law enforcement and similar requests in accordance with applicable law; pursuing legal rights and remedies; defending litigation and managing any internal complaints or claims; and complying with internal policies and procedures	<b>Processing of your personal data is:</b> necessary to comply with a legal or regulatory obligation

We may also collect and use "special categories" of your personal data (formerly known as "sensitive personal data"), which means personal data relating to your trade union membership, health, criminal convictions and history, ethnicity, religion, sexuality or political persuasion. Where such personal data is required we will only process this as follows:

- where we have your explicit consent;
- where it is necessary for carrying out our obligations and exercising our rights in the field of employment, social security or social protection law or collective agreement;
- where it is necessary for the assessment of your working capacity;
- where it is necessary for reasons of substantial public interest;
- where required under a specific legal obligation; or

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- where you have manifestly made this information available to us.

## **Disclosing your personal data**

We may disclose your personal data to our affiliates, group companies and certain third parties to process your personal data on our behalf. In each case, we will ensure that all such parties only process your personal data in accordance with this Privacy Notice.

We may also disclose your personal data in the following circumstances:

- where if we believe that doing so is necessary to protect the rights, property, security, or safety of us, our production, our other talent and crew, or the public;
- to enforce any contract or policies we have in place with you;
- to investigate and defend ourselves or others against any third-party claims or allegations; and
- in relation to a business transaction, such as a merger, change of control or sale of assets.

Whenever in the course of sharing information we transfer personal data to countries outside of the European Economic Area and other regions with comprehensive data protection laws, we will ensure that the information is transferred in accordance with this Privacy Notice and as permitted by the applicable laws on data protection.

## **Data retention**

Netflix will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Please note, we will always retain a record of all of those involved in the production for our records.

## **Your duty to inform us of changes**

Netflix is required to ensure that the personal data it holds about you is accurate and up-to-date. We therefore request that you notify us as soon as possible if your personal data changes during your relationship with us.

## **Your rights**

You can request access to your personal data, or correct or update out-of-date or inaccurate personal data we hold about you. You can object to processing of your personal data, ask us to restrict processing of your personal data or request portability of your personal data; if we have collected and process your personal data with your consent, then you can withdraw your consent at any time; withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent; you have the right to complain to a data protection authority about our collection and use of your personal data.



To make requests, or if you have any other question regarding our privacy practices, please contact our Data Protection Officer/Privacy Office. When contacting our Data Protection Officer/Privacy Office, please be sure to advise in regard to which production(s) you were affiliated: [netflixdpo@netflix.com](mailto:netflixdpo@netflix.com). We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may reject requests that are unreasonable or not required by law, including those that would be extremely impractical, could require disproportionate technical effort, or could expose us to operational risks.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Please be aware that the rights above are not absolute and there may be circumstances where we are unable to comply with your request (either wholly or in part). In such cases we will explain why we cannot comply with the request.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

#### **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us (contact details at the end of this privacy notice). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another lawful basis for doing so, which we will inform you of when responding to you. Please note, however, that in most cases we do not rely on your consent to process your personal data.

#### **Contact us**

If you have any queries in relation to your personal data or how it is processed by Netflix please contact our Data Protection Officer/Privacy Office at the email address below. When contacting our Data Protection Officer/Privacy Office, please be sure to advise in regard to which production(s) you were affiliated:

Netflix Data Protection Officer: [netflixdpo@netflix.com](mailto:netflixdpo@netflix.com)