



# REVOLUTION VIEWING

## Creating Desire

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### Product Production Privacy Notice

“Producing the world’s most creative, awe inspiring and desirable visual experiences.”

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**Data Controller:** Revolution Viewing Ltd, 1 Canal Place, Leeds, LS12 2DU  
**Person Responsible:** Tony Lyons; [hello@revolutionviewing.com](mailto:hello@revolutionviewing.com)

Many of the products produced by Revolution Viewing Ltd (RV) feature people or personal information. RV is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

## 1 What Personal Information Does RV Collect & Why?

### 1.1 Data Captured by us

A number of our products rely on the capture of footage (primarily in the form of videos and photography) and it is very common that these products feature people and/or personal information. The information captured is provided to us by the Data Subject(s) with the explicit permission of the Data Subject(s) who must provide consent to the Data Controller (our client) for their data to be shared with us (the Data Processor) and used in the way(s) outlined by the Data Controller. The Data Controller must provide evidence of this consent to RV, on request. In some instances, it is not possible for our clients to obtain the consent of every individual shown within a scene (for example, when filming in a busy public place).

### 1.2 Data Supplied to us by our Clients

For some products (for example our Virtual Tours), it is not uncommon for our clients to send us content which features the personal information of Data Subjects. In such instances, the data supplied will be used for the intended purpose/project only. It is the responsibility of our clients to ensure that consent has been given by Data Subjects for their personal information to be used in this way.

## 2 Who Has Access to Data?

Supplied personal information (be that supplied by our clients or captured by RV) will be shared internally at RV with relevant members of the team and with the third party suppliers who store the data.

RV use a number of trusted third party suppliers to store and distribute data relating to projects, some of which may contain personal information. For more information on our trusted third party suppliers, please contact us at [hello@revolutionviewing.com](mailto:hello@revolutionviewing.com).



## 3 How Does RV Protect Data?

RV takes the security of your data seriously. RV have internal policies and controls in place to try to ensure that data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where RV engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of that data.

All digital services that we use have appropriate security measures in place including password protection, encryption and 2-step verification (where applicable).

## 4 For How Long Does RV Keep Data?

RV hold project files for a maximum of 3 years from the point of delivery to the client to accommodate requests from clients for amendments to be made.

## 5 The Rights of Data Subjects

Where personal information is featured in our products, the Data Subjects of this information, have a number of rights. They can:

- access and obtain a copy of their data on request;
- require RV to change incorrect or incomplete data;
- request RV delete or stop processing their data, for example where the data is no longer necessary for the purposes of processing. Note, that this is a request only. Should we feel that we have a legitimate interest to continue to store/process the data then the request can be denied on this basis;
- object to the processing of your data where RV is relying on its legitimate interests as the legal ground for processing; and
- ask RV to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override RV's legitimate grounds for processing data.

If you would like to exercise any of these rights, please email us at [hello@revolutionviewing.com](mailto:hello@revolutionviewing.com)

If you believe that RV has not complied with your data protection rights, you can complain to the Information Commissioner's Office (<https://ico.org.uk/>).



## 6 What if Data Subjects do not Provide Personal Data?

Consent by Data Subjects for their personal information to be used in our products in the way outlined by the Data Controller must be sought prior to any filming taking place. If consent is not given, the individual should not appear in the product unless RV have a legitimate interest to continue processing the data.

Should an individual retract their consent once data collection has occurred, or if it wasn't possible to obtain consent, processing of this data should stop. However, there may be cases where RV has a legitimate interest to continue processing the data. Specifically, RV may have a legitimate interest where:

- i. there is a real business interest being pursued in continuing to process the personal data;
- ii. the processing is absolutely necessary in order for the business to pursue that interest (i.e. the interest cannot be pursued in another way which is proportionate); and
- iii. the processing is balanced against the impact such processing will have on the fundamental rights and freedoms of Data Subjects.

## 7 Automated Decision Making

No automated decision making takes place as a result of the collection of personal information by RV during the production of our products.