



REVOLUTION VIEWING LTD.

Product: Production Privacy Notice

v03 - 20 September, 2023 (AW)

103 Kirkstall Road
Leeds, LS3 1JL
+44 (0)1132 053750
hello@revolutionviewing.com
www.revolutionviewing.com

1. IMPORTANT NOTE

The Vepple product has its own Privacy Policy for end-users; please contact your Account Manager or Project Manager for more information.

2. WHAT INFORMATION DOES REVOLUTION VIEWING COLLECT & WHY?

2.1. DATA CAPTURED BY US

Many of our products rely on capturing footage (primarily in videos and photography), commonly featuring people and 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 Revolution Viewing on request.

In some instances, our clients can't obtain the consent of every individual shown within a scene (for example, when filming in a busy public place).

2.2. 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 only be used for the intended purpose/project. Our clients are responsible for ensuring that consent has been given by Data Subjects for their personal information to be used in this way.

3. WHO HAS ACCESS TO THE DATA?

Supplied personal information will be shared internally at Revolution Viewing with relevant team members and third-party suppliers who store the data.

Revolution Viewing uses several trusted third-party suppliers to store and distribute data relating to projects, some of which may contain personal information. For more details about our trusted third-party suppliers, please contact us at hello@revolutionviewing.com.

4. HOW DOES REVOLUTION VIEWING PROTECT DATA?

Revolution Viewing takes the security of your data seriously. Revolution Viewing has internal policies and controls to ensure that your data is not lost, accidentally destroyed, misused, disclosed or accessed except by its employees in performing their duties.

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

All digital services Revolution Viewing uses have appropriate security measures, including password protection, encryption and 2-step verification (where applicable).

5. FOR HOW LONG DOES REVOLUTION VIEWING KEEP DATA?

Revolution Viewing holds project files for a maximum of 3 years from the point of delivery to the client to accommodate requests for amendments.

6. THE RIGHTS OF DATA SUBJECTS

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

- access and obtain a copy of your data on request;
- require Revolution Viewing to change incorrect or incomplete data;
- need Revolution Viewing to delete or stop processing your data, for example, where the data is no longer necessary for processing;
- object to the processing of your data where Revolution Viewing relies on its legitimate interests as the legal ground for processing and
- ask Revolution Viewing to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override Revolution Viewing's legitimate grounds for processing data.

If you want to exercise these rights, please email us at hello@revolutionviewing.com.

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

7. 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 before any filming takes place. If consent is not given, the individual should not appear in the product unless Revolution Viewing has 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 permission, processing of this data should stop. However, there may be cases where Revolution Viewing has a legitimate interest to continue processing the data. Specifically, Revolution Viewing may have a legitimate interest where:

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

8. AUTOMATED DECISION MAKING

No automated decision-making occurs due to Revolution Viewing collecting personal information from our products.

9. DATA PRIVACY OFFICER

If you have any questions, suggestions or feedback on this policy, please contact our Chief Operations Officer and Data Privacy Officer, Tony Lyons:

Email: tony.lyons@revolutionviewing.com

Telephone: +44 (0)113 205 3750

Address: Revolution Viewing Ltd, 103 Kirkstall Road, Leeds, LS3 1JL