



Privacy Policy

At Channel 4 we are committed to keeping your personal data safe and secure and handling it in accordance with our legal obligations. Channel 4 is the data controller of any personal data that you provide to us as part of this Core4 community. This means that we are responsible for deciding how and why your data is used and for ensuring that your data is handled legally and safely.

We have appointed a Data Protection Officer (**DPO**) who has ultimate responsibility within Channel 4 for making sure your data is treated in accordance with this Privacy Policy and the law. Our DPO can be contacted by emailing dataprotection@channel4.co.uk.

Alida (rebranded from Vision Critical) is a third-party service provider that we use to provide the Core4 service. We also use third-party fulfilment provider Virtual Incentives to distribute Core4 prizes.

This Core4 Privacy Policy sets out in detail the purposes for which we process your personal data, who we share it with, what rights you have in relation to that data and everything else we think it's important for you to know.

Overview

We collect certain personal data from you when you become a member of Core4 and when you respond to surveys, forums and polls within it. This helps us to understand viewers' opinions, views and attitudes towards our content (including our advertising) and our platforms.

We will never share the personal data that you provide to us through Core4 with third parties other than Alida (that provide the Core4 service on Channel 4's behalf) and Virtual Incentives (for the sole purpose of Core4 prize draw fulfilment)

We will delete your personal data when you choose to close your account, which you can do at any time.

You have various rights in relation to your personal data which can be exercised by contacting us using the details set out in this Privacy Policy. These rights are set out in **What rights do you have** below.

1. What data do we collect and where from?

1.1. When you sign up to be a member of Core4, we will collect the following personal data directly from you by means of the initial sign up questionnaire that we send you to fill out, which helps us to build up an aggregated in-depth picture of our viewers:

- your full name;
- your email address;
- the password you set up to access your account;
- your full date of birth;



- your gender (if you choose to provide it);
- the region you currently live in;
- financial information such as your type of employment, your income bracket and whether or not you are the main income earner in your household; and
- various other information about your general lifestyle, hobbies and your television viewing behaviour.

In this form, we also collect the following special categories of data about you as follows:

- ethnic origin;
- sexual orientation; and
- whether or not you have a disability or any long term health problems.

- 1.2. We also collect information about you from the responses you provide to the surveys, forums and polls you participate in. Depending on the nature of the survey, we may also collect certain other special categories of personal data about you such as information about your political opinions or your religious or philosophical beliefs.
- 1.3. We collect information about you when you participate in competitions and prize draws, such as your contact information. This data is only used for the purposes of the relevant competition or prize draw and will be subject to the terms and conditions of that competition, which will be notified to you when you enter the competition.
- 1.4. We also collect anonymous data using cookies and other similar technologies. Cookies allow us to recognise your browser or device and, for example, identify whether you've visited our website, what you've previously viewed or clicked on, and how you found us. The information is anonymous and only used for statistical purposes. It allows us to track information, such as how many individual users we have and how often they visit our websites. It also helps us to analyse patterns of user activity and to develop a better user experience. Web analytics data and cookies cannot be used to identify you as they never contain personal information such as your name or email address. You can find more detailed information about this in our [Cookies Policy](#).

2. What do we use your data for?

- 2.1. It is important that you understand how and why we use the personal data that we collect about you. We use the data that you provide us with for the following purposes:
 - To provide feedback in surveys to enable us to assess our performance and to improve our products and services;
 - To improve the products and services of our advertising partners; and
 - To enable us to provide you with any prizes which you have won when you enter prize draws.



- 2.2. We aggregate and anonymise the information that you provide to us in order to use it internally and to share with advertisers so that they know how effective their advertising is. When used like this, this data does not enable you or any other individual user to be identified.
- 2.3. As you sign up to the community, we will link your Core4 account to your Channel 4 account (if you have one) by means of a globally unique identifier (known as a "GUID"). The purpose of this is to be able to send you surveys, forums or polls that will help us to better understand how our services and products are received and allow us to improve our offering to our viewers. E.g. we could send you a survey about a particular programme and/or advert that you have watched while streaming on Channel 4 to get your feedback on it. Conversely we could send you a survey about something you may not have watched in order to understand why that's the case.

3. What is our legal basis for using your data?

- 3.1. Data protection law says that we have to tell you the legal basis that we rely on to process your personal data for the purposes that we have notified to you.
- 3.2. We process your personal data on the basis that it is in our legitimate interests to use it to continue to improve our products and services (including our advertising) and provide you and other users with the best and most effective service possible.

4. Who do we share your data with?

- 4.1. Alida, our Core4 service provider, may have access to your data for the purposes of maintenance and support of the platform on which the community is hosted and to troubleshoot technical issues with your account. Virtual Incentives receive email and first name to distribute winners prizes on Channel 4's behalf.
- 4.2. We do not share the personal data that you provide us as part of being a Core4 member with any other third parties. All data that we provide to our advertising partners is completely anonymous.

5. How long do we keep your data for?

- 5.1. We will keep all your personal data for as long as you choose to be a member of Core4. You can close your account at any time by either:
 - 5.1.1. unsubscribing by using the link at the bottom of any Core4 emails; or
 - 5.1.2. via the Core4 homepage by clicking the **MORE** or **ALL** button (depending on device used), clicking **Team** and then clicking on the **Leave Community** button.
- 5.2. If your account is inactive for a period of two years, we will send you a reminder email to remind you to use your account. If you still do not use your account, we will send a further reminder email before deleting your account and deleting your account.

6. What rights do you have?



- 6.1. You have a number of rights under data protection law. These rights and how you can exercise them are set out in this section. We will normally need to ask you for proof of your identity before we can respond to a request to exercise any of the rights in this section and we may need to ask you for more information, for example to help us to locate the personal data that your request relates to.
- 6.2. We will respond to any requests to exercise your rights as soon as we can and in any event within one month of receiving your request and any necessary proof of identity or further information. If your request is particularly difficult or complex, or if you have made a large volume of requests, we may take up to three months to respond. If this is the case we will let you know as soon as we can and explain why we need to take longer to respond.
- 6.3. A right to access your information
 - 6.3.1. You have the right to ask us to send you a copy of the personal data that we hold about you (subject to some exceptions).
 - 6.3.2. A request to exercise this right is called a "subject access request" and must be made in writing to: dataprotection@channel4.co.uk or to: Data Protection Officer Channel 4 Enquiries, PO Box 1058, Belfast, BT1 9DU.
- 6.3.3 We do not accept subject access requests made via third parties without a letter of authorisation from you sent directly to us confirming that you authorise the third party to act on your behalf. We do not accept SAR requests from platforms where we are required to set up an account in order to provide the response to the SAR
- 6.4. A right to object to us processing your information
 - 6.4.1. You have a right to object to us processing any personal data that we process where we are relying on legitimate interests as the legal basis of our processing. You can exercise this right by emailing dataprotection@channel4.co.uk.
 - 6.4.2. If we have compelling legitimate grounds to carry on processing your personal data, we will be able to continue to do so. Otherwise, we will cease processing your personal data.
- 6.5. A right to have inaccurate data corrected
 - 6.5.1. You have a right to ask us to correct inaccurate data that we hold about you. If we are satisfied that the new data you have provided is accurate, we will correct your personal data as soon as possible.
- 6.6. A right to have your data erased
 - 6.6.1. You have a right to ask us to delete your personal data in certain circumstances, for example if we have processed your data unlawfully or if we no longer need the data for the purposes set out in this Core4 privacy policy. If you would like to make a request to exercise this right, please email dataprotection@channel4.co.uk.



6.6.2. We will delete any personal data we hold about you when you close your account, as set out under "How long do we keep your data for?" above. If you ask us to delete your personal data but you do not want your account closed, we will usually need to keep processing your personal data to keep your account open, so you should be aware that we may not be able or obliged to comply with your request.

6.7. A right to have processing of your data restricted

6.7.1. You can ask us to restrict processing of your personal data in some circumstances, for example if you think the personal data is inaccurate and we need to verify its accuracy, or if we no longer need the data but you require us to keep it so that you can exercise your own legal rights.

6.7.2. Restricting your personal data means that we only store your personal data and don't carry out any further processing on it unless you consent or we need to process the data to exercise a legal claim or to protect a third party or the public.

7. Who do we share your data with?

We transfer personal data outside of the EEA in the following ways:

| Activity | Location | Safeguards |
|--------------------|--|--|
| Virtual Incentives | Processes certain personal data – name and email address - in the US for the purpose of distributing incentives. | Virtual Incentives uses EU approved Standard Contractual Clauses to cover the international transfer of personal data. |

8. How can you contact us?

8.1 If you have any questions or concerns about this Core4 privacy policy and/or our processing of your personal data, you can get in touch with our Data Protection Officer using: dataprotection@channel4.co.uk.

9. What if you have a complaint?

9.1. You have a right to complain to the Information Commissioner's Officer (ICO), which regulates data protection compliance in the UK, if you are unhappy with how we have processed your personal data.

9.2. You can find out how to do this by visiting www.ico.org.uk.

10. What if this policy changes?

10.1 We may make changes to this Privacy Policy from time to time. Any changes we make will be posted on this page. We may also notify you by email if significant changes are made.