

Audio and Visual Policy

1. Video Conferencing Applications

- 1.1 We use 3rd party proprietary video conferencing facilities within our business activity, which are able to record the conversations and presentations which occur during their use.
- 1.2 We understand that the participants of these conversations should be made aware that we are processing their Personal Data.
- 1.3 Where Video conferencing conversations are recorded and kept by us this data may be subject of a Data subject access Request.
- 1.4 We do not generally record and keep the conversations but when we do so the data and its security will be in dealt with in accordance with this Privacy policy.
- 1.5 A Legitimate Interests Assessment was conducted by the Directors of Real Response Media Ltd. The full text of the test is reproduced in Appendix C. The conclusions of the test are as follows:.
- 1.6. The Legitimate Interest Assessment Test determined the following:
 - 1.6.1 Following the assessment, it was decided that there was no infringement of the DATA PROTECTION ACT 2018 or the rights of the individual participants in our use of a Video Conferencing Application.
 - 1.6.2 The legal basis for its use was established as being in our Legitimate Interests for the following purposes:
 - 1.6.3 To facilitate efficient video and telecommunications.
 - 1.6.4 To protect the safety of our employees and participants on the call from unnecessary real world travelling.

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1.6.5 To support our primary business objectives.

2. Video Conferencing Policy

General

- 2.1 This Policy has been established in accordance with the determinations of our Data Audit and the published guidance of the UK National Cyber Security Centre. (NCSC) on Video Conferencing and Cloud security.
- 2.2 We will only use the Video Conferencing Application Platforms (the Platform) which are from time to time approved by the Directors.
- 2.3 The Security and Privacy settings on the Platform will be checked and adjusted to ensure the safety of participants to the call.
- 2.4 The choice of platform will be reviewed at least annually during the Privacy review or sooner if issues are reported to the nominated Data Contact.

Phishing

- 2.5 We are aware of the practice of Phishing during video conference calls. Phishing may be defined as follows: 'Phishing is the fraudulent attempt to obtain sensitive information such as usernames, passwords and credit card details by disguising oneself as a trustworthy entity in an electronic communication.'
- 2.6 Caution will be used when engaged in video conference calling especially in the use of any 'Live Chat' features to reduce the opportunities for Phishing.
- 2.7 Participants will not be allowed to share external links during the call without the express permission of the Moderator.
- 2.8 All Participants will be warned regarding the dangers of Phishing, clicking unknown links etc at the commencement of a call.

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The Platform

- 2.9 The Video Conference Platform will be approved by the Management before use.
- 2.10 The latest software version must be checked for and downloaded prior to each use of the platform.
- 2.11 Consideration will be given to any 'paid for' version of the Platform if such a version exists and if it provides greater security and Privacy for the participants.

Passwords

- 2.12 Every use of the Platform will be controlled by the use of a Password to access any individual Video Conference call.
- 2.13 To reduce the risk of phishing and or deliberate interference or corruption of the process, when the call is either open to the public or has more than 5 separate participants, consideration will be given to using individual password access for each participant.

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