

PRIVACY POLICY

1. Introduction

We are **Bookings Models Ltd** (“we” or “us” or “Bookings”), a company registered in England and Wales. Our company registration number is 05744857 and our registered office is at **Lynwood House, 373/375 Station Road, Harrow, Middlesex, HA1 2AW**. Our principal trading address is at **7 Cottons Gardens, London E2 8DN**. Our registered VAT number is 242 359 762

We are committed to protecting your **personal data**. This privacy policy gives you detailed information on when and why we collect your **personal data**, how we use it and how we keep it secure. Please read this policy carefully alongside any applicable **Terms & Conditions** to understand our views and practices regarding your **personal data** and how we will treat it.

Definitions, and words in **bold type**, are defined in **Appendix 1** at the end of this privacy policy.

2. Our responsibilities

For the purpose of the applicable **Data Protection Legislation**, we are the **data controller** of any personal data we **process**. As a **data controller**, we are responsible for ensuring our systems, processes, suppliers and **People** comply with **Data Protection Legislation** in relation to the **personal data** we handle.

We require our **People** to comply with this privacy policy and our **Data Protection Policy** when dealing with **personal data**.

We take **Personal Data Breaches** very seriously, and are required to notify the Information Commissioner’s Office in the event of such a breach.

When using, collecting and disclosing **personal data**, we follow the key data protection **principles**.

We have policies, procedures and records to demonstrate compliance with the **principles**, as further detailed in our **Data Protection Policy**.

3. How we collect and use your personal data

Generally, we collect your **personal data** when you interact with us (for example, when entering into a relationship with us as **Talent**, a **Client** or one of our **People**). However, from time to time we also need to collect personal data from other **third parties** in connection with our relationship with you. The types of personal data we may hold about **Talent**, **Clients** and our **People** are set out in **Appendix 2** to this privacy policy.

In the course of providing services to you, we may collect information that could reveal your racial or ethnic origin, sexual orientation, political opinions, physical or mental health, religious or philosophical beliefs, trade union membership or genetic or biometric data. Such information is considered "special categories or data" under the GDPR and other data protection laws. We only collect this information where you have given your explicit consent or one of the other exemptions apply (e.g. it is necessary to comply with our employment law or other contractual obligations).

The personal data of **Talent** for relationship management is collected from **Talent** directly (usually by submission of the form on our **Website** or from their CV) and further information may be collected from third parties, such as publicly available sources including social media. Any additional **personal data** is collected when supplied to us, or created by us in connection with a particular matter on which we are engaged. **Personal data** is used for relationship management and file opening data is

used for providing legal services, human resources and general administration, commercial purposes and as required by law.

In relation to our **People**, **personal data** will be collected from various sources including their application form/CV; and notes and records kept for the duration of employment.

We will retain the **personal data** of **Talent** for a period of up to ten years, or for as long as is required to fulfil any payment obligations we may have. We will retain the **personal data** of **Clients** and our **People** for up to seven years. We will not hold any **personal data** for longer than is strictly necessary.

4. How we disclose your personal data

We may disclose your personal data, in various ways and for various reasons, with the following categories of people:

- our clients and other foreign agencies to enable us to secure work for you;
- colleagues within Bookings;
- any member of our group;
- tax, audit or other authorities, when we believe in good faith that the law or other regulation requires us to share this information;
- third party service providers who perform functions on our behalf (e.g. lawyers, auditors, accountants, technical support functions and IT consultants);
- a cloud-based storage provider;
- on call sheets when you participate in a job;
- travel agents and clients to book travel/visas for you; and
- a third party who acquires us or substantially all of our assets.

Personal data may be disclosed to our third party service providers who support the operation of our business and to our models for the purposes of fulfilling our contractual obligations. We shall only transfer **personal data** to third parties to the extent required to fulfil our statutory and legal obligations and legitimate interests and subject always to it being adequately protected.

Photographs and images of **Talent** may also be used on our **Website** and other promotional material, including prospective pitches to **Clients**.

5. Transfer of Data between Jurisdictions

Personal data may be transferred globally for the purposes of fulfilling our obligations to our Talent and Clients. We also use a number of suppliers in connection with the operation of our business and they may have access to the personal data we process. For example, an IT supplier may see our personal data when providing software support, or a company which we use for a marketing campaign may process contacts' personal data for us. When contracting with suppliers and/or transferring personal data to a different jurisdiction, we take appropriate steps to ensure that there is adequate protection in place and that the principles are adhered to.

6. Your rights

Personal data must be processed in line with an individual's rights, including the right to:

- request a copy of their **personal data**;
- request that their inaccurate **personal data** is corrected;
- request that their **personal data** is deleted and destroyed when causing damage or distress;

- opt out of receiving electronic communications from us; and
- request to stop processing your information.

Should you wish to make a request in line with your rights as an individual, please forward it to us using the contact details provided at the end of this privacy policy.

Our **People** must notify or inform **Kathryn Carter-Allen** immediately if they receive a request in relation to **personal data** which the firm processes.

The **Data Protection Legislation** gives you the right to access information held about you. Your right of access can be exercised in accordance with the **Data Protection Legislation** (as applicable).

7. Security

Information security is a key element of data protection. We take appropriate measures to secure **personal data** and protect it from loss or unauthorised disclosure or damage. Our policy and approach to information security is contained within our **Data Protection Policy**.

8. Changes to our privacy policy

Any changes we may make to this privacy policy in the future will be posted on our **Website** and, where appropriate, notified to you by e-mail. Please check back on our **Website** frequently to see any updates or changes to our privacy policy.

9. Contacts and complaints

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to our customer service team by writing to us at **mail@bookingsmodels.co.uk**

You should direct all complaints relating to how the firm has processed your **personal data** to **Kathryn Carter-Allen**

Our **People** must inform **Kathryn Carter-Allen** immediately if they receive a complaint relating to how we have processed **personal data** so our complaints procedure can be followed.

Date updated: May 2018.

Appendix 1

Clients: any person, business or other organisation who engages, or is looking to engage, the services of our **Talent**.

Controller: a personal/organisation who determines the **purpose** for which, and the manner in which, any **personal data** is processed.

Data Protection Legislation: (i) the General Data Protection Regulation (Regulation (EU) 2016/679) and all related national laws, regulations and secondary legislation; and (ii) the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2003/2426) and all other applicable national laws, regulations and secondary legislation implementing European Directive 2002/58/EC, in each case as amended, replaced or updated from time to time and together with any subordinate or related legislation made under any of the foregoing.

Data Protection Policy: our internal data protection policy which sets out how we keep **personal data** secure, including technical measures (e.g. encryption of **personal data**, restricted access to **personal data**, monitoring and testing systems for unauthorised access, backups of **personal data**), roles and responsibilities of individuals and the scope of protection.

People: all people providing services to or working for us, including but not limited to our employees, directors, members, and contractors.

Personal data: information (including opinions) which relates to an individual and from which he or she can be identified either directly or indirectly through other data which we have or are likely to have in our possession. These individuals are sometimes referred to as **data subjects**. Your personal data may include your name, gender, your contact details, date of birth, description, measurements, financial details, social media handle, distinctive features (including tattoos), dietary requirements, work preferences.

Personal Data Breach: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, **personal data** transmitted, stored or otherwise **processed** by an organisation electronically. A **personal data breach** may mean someone outside the organisation gets unauthorised access to **personal data**, but a breach can occur if there is unauthorised access within the organisation or if an employee accidentally alters or deletes **personal data**.

Principles: the core data protection principles underlying the Data Protection Legislation, which specify **personal data** should be: processed lawfully, fairly and in a transparent manner; collected for specified, explicit and legitimate **purposes**; adequate, relevant and limited to what is necessary; accurate and, where necessary, kept up to date; kept for no longer than is necessary; processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. Additionally, organisations must adhere to the principal of accountability.

Process: the 'processing' of **personal data** captures a wide range of activities, and includes obtaining, recording and holding **personal data** and performing any operation of the **personal data** (including erasure/destruction).

Processor: any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

Purpose: the purposes identified in the “**Purpose**” column of the tables in section 3 of this privacy policy (How we collect, use and disclose your **personal data**), as applicable.

Talent: models and/or other talent who have engaged, or are looking to engage, our modelling and/or talent agency services and are or are considering being, represented by us.

Terms and Conditions: [the Terms and Conditions for booking models], [the Mother Agency Talent Representation Agreement] and [the Website Terms of Use].

Third party: a person, organisation or other body other than the **data subject, controller, processor** and persons who, under the direct authority of the **controller** or **processor**, are authorised to process **personal data**.

Website: www.bookingsmodels.co.uk

Appendix 2 – Types of Personal Data

Talent:

Information such as:

- name, address, contact details, education and employment history;
- background checks;
- identification documentation;
- right to work status;
- information relating to next of kin/ dependants;
- financial information including bank details and identifiers (e.g. National Insurance numbers);
- images/photographs of;
- social media user profiles; and
- reviews/feedback relating to ability as a Model.

We may also process sensitive personal data including your description and measurements and racial origin.

Clients:

Information such as:

- name and business information;
- identification documentation; and
- payment details.

Our People:

Information such as:

- name, address, contact details, education and employment history;
- background checks (financial and criminal),
- identification documentation;
- right to work status;
- information relating to next of kin/ dependants; and
- financial information including bank details and identifiers (e.g. National Insurance numbers).

We may also process sensitive personal data such as health details, racial origin, religious beliefs and information about offences/ alleged offences.