

INTERNATIONAL TALENT LIMITED -WEBSITE PRIVACY POLICY

This website is owned and operated by International Talent Limited (“ITL”, “our”, “we” or “us”) and accessible at URLs talentmanagement.com, modelsdirect.com, actor-direct.com, singers-direct.com, dancers-direct.com, musicians-direct.com, entertainer-direct.com, internationaltalent.com (or such other URL that ITL may use to provide this website from time to time). ITL is the controller of all personal information collected on this website.

We believe strongly in protecting the privacy of all website users (“you”, “yours”) and this notice sets out how we use your personal data (“personal information”).

Accordingly, ITL has reviewed its policies and practices to ensure that they meet legislation introduced within the European Economic Area (EEA), which includes the European Union (EU), in line with REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) and subsidiary directives (“the Directives”), as implemented in English law by the Data Protection Act 1998 and will continue to ensure that its policies and practices comply in all respects with any future laws and regulations in relation to your privacy.

ITL may be both data controller and data processor for your personal data under certain circumstances.

Overview

Consent: It is important you specifically consent to ‘International Talent Limited’ trading as ‘Models Direct’ and ‘Talent Management’ storing and using in accordance with this Privacy Policy whatever personal data including pictures you submit in this application.

If your application is successful, for us to use your data thereafter representing you or your child, to hirers in the film, TV, advertising, fashion, catalogue, media, photographic and promotion industries, as a talent registered with us, available for paid work assignments. Full details below.

Withdrawing consent: You may withdraw your consent for us to use you or your child's data at anytime. However in doing so, we will delete all your / their data and you will simultaneously terminate your agreement with us, as we will no longer have any information to effectively represent you / them.

Children: Children have the same data protection rights as adults. It is our priority that their data is safely preserved and only used by us expressly with your parental / guardian consent and specifically at your request, to promote them in the film, TV, advertising, fashion, catalogue, media, photographic and promotion industries as available for accompanied paid work assignments with you as chaperone.

Useage: We do not sell, share or pass on, any data to any organisation or person, except in the explicit course of our normal business as a model and talent employment agency. Data is used exclusively for our application process and is held thereafter for 6 months, or if the application is successful for 7 years upon conclusion of the Registration Term, whereupon it is deleted.

Your consent

By registering on this website or otherwise, you consent to the collection, use and transfer of your personal information under the terms of this privacy policy.

Where you are a Minor, your Parent acknowledges Parental Responsibility for you and accepts the terms of this privacy policy on the same terms (and adopting here the same definitions of 'Minor', 'Parent' and 'Parental Responsibility' included and) set out in our Terms of Use

What personal information do we gather from you?

We gather personal information such as contact names, birth dates, e-mail addresses, addresses, mobile telephone numbers, job/talent descriptions, photographs, and your comments and/or messages (possibly including details of your qualifications, experience and related statistics) that you provide voluntarily when you fill in appropriate sections of our website. For example when you complete our respective on-line registration and Contact Us forms in order to provide information about products and/or services you wish to supply to us and/or products and/or services you wish to purchase from us, and when you provide and/or request details of your/our products and services, you provide us with personal information which we hold and use for the purposes set out in the next section. We may also keep details of your visits to our site including, but not limited to traffic data, location data, weblogs, user actions and other communication data.

Use of your personal information

Our main aim in gathering your personal information is to provide you with a customised service.

We will process all the personal information we collect and hold on you fairly and in accordance with applicable law. As further explained in this privacy policy, we will ensure the quality and security of your personal information (even if the personal information are transferred to third party organisations in Europe or elsewhere, as set out below); and we will fully respect your rights, interests and fundamental freedoms with regard to your personal information.

We will only collect, record, process and store data which are needed to fulfil our contractual obligations towards you, our customers, our partners within the ITL Network (as defined below) and the customers of our partners; to serve other legitimate business interests such as credit assessment or marketing; or to comply with legal requirements.

Specifically, if you (whether on your own or another's behalf) fill in your details on for example our respective on-line registration and Contact Us forms, we use your personal information in order that we can contact you and respond to any questions, enquiries and needs that you may have and we will send to you by one or more of mail, telephone, fax, automated telephone call, e-mail, SMS text message or other electronic means marketing information and news, for example, relating to new product and/or service offerings, special offers, competitions and other promotions and offers, as requested by you or that we consider may be of interest to you. We also use your personal information so that we can carry out your requests by you for our provision of services or our procurement of such services by one or more of our partners within the ITL Network (as defined below). If you purchase products and services by telephone, on-line or face to face as appropriate and available from time to time, we collect data so that the products and/or services can be supplied to you and services performed as efficiently as possible. We may also use aggregate personal information and statistics for the purposes of monitoring website usage in order to help us develop the website and our products and services and may provide such aggregate personal information to third parties. These statistics will not include any data that can be used to identify any individual.

However, please note that we will not contact you for these above purposes unless you authorise us to do so by either ticking the relevant boxes (i.e. during registration on the website) to authorise us to make such contact or you provide such authorisation in writing to us or electronically via the website (if applicable).

When we collect personal information from you, we will by way of Data Protection Notice identify ourselves and inform you of the purpose(s) for which we collect the personal information. If we are

collecting personal information from you on behalf of a selected third party organisation outside of the ITL Network (as defined below) we will identify that selected company (the "controller" in terms of the European data protection regime) and explain that we are acting as the agent (or "processor", if appropriate) for that other third party organisation. If we have obtained personal information on you other than directly from you, we will inform you of this as soon as practicable after we have entered the personal information in our files or computers (unless you were already aware of the fact). We may also record or monitor telephone calls to and from any of the parties within the ITL Network (as defined below) without notification, for staff training and quality control purposes.

If, at some time in the future, we wish to use your personal information in ways other than those set out in this privacy policy and requiring your prior consent, then we will notify you about this and seek your permission to do so.

Sharing of personal information

We may share personal information within the ITL Network ("ITL Network"); by this expression, we mean the ITL group, and each and any of ITL group's subsidiaries, together with its officers, employees, licensee agents, other agents, distributors, consultants, suppliers, hirers, customers and certain selected third party organisations. The ITL Network will process your personal information in accordance with this privacy policy and all privacy and communications legislation.

Those selected third party organisations are either our partners who perform a function relating to our purchasing or provision of products and services, promotions and/or offers, or are agencies and suppliers whom we have retained to assist us to more effectively fulfil orders, manage and conduct our business generally, provide technical assistance and support and perform other functions to support our marketing activities.

We may pass your personal data to third parties for the provision of services on our behalf (for example processing your payment). However, we will only ever share information about you that is necessary to provide the service and we have specific contracts in place, which ensure your personal data is secure and will not be used for any marketing purposes.

All selected third party organisations may have access to personal information if needed to perform such functions, but will only be permitted by us to use such personal information for the purpose of performing that function (which may include one to which you have expressly given your consent) and not for any other purpose

In order to provide products and/or services to you, we do envisage our wishing to transfer personal information about you to any member or members of the ITL Network or outside of the EEA, data processing agencies ("processors"), selected companies or third party organisations outside the EU or the EEA for analysis, technical processing or other legitimate purposes. The countries where such other facilities or companies or third party organisations are situated may have no data protection legislation, or laws which are less rigorous than the legislation introduced by the Member States of the EU and the EEA. In such cases, we will ensure that your rights with regards to any such processing and your personal information will still be adequately protected. Within the ITL Network, we have agreed world-wide acceptance of the European standards with regard to the transfer of personal information. If we transfer your data to agencies or third parties organisations outside the EEA, we require similar, binding contractual undertakings, and we monitor compliance. Our selected companies have agreed to adopt equivalent measures.

Of course if we need your further specific and express consent to do this, we will obtain it before transferring any personal information.

In all cases, any use of your personal information by the ITL Network which has been instigated by us (as opposed, for example, to a promotional partner), will comply with this privacy policy.

Occasionally, with your permission and depending on the purpose for and context in which you gave that permission, we will send to you by one or more of mail, telephone, fax, automated telephone call, e-mail, SMS text message or other electronic means marketing information and news, for example, relating to new product and/or service offerings, special offers, competitions and other promotions and offers. This may include our sending to you marketing information for the products and/or services of a promotional selected third party organisation on that selected third party organisation's behalf.

However, in every case, if you do not elect to receive such communications (by either ticking the relevant boxes (eg: during registration on the website) to authorise us to make such contact or you provide such authorisation in writing to us or electronically via the website, if applicable) or if you elect to discontinue receiving them, then we will not send or will cease sending them to you. Please note that whilst we will not send you communications that you do not want, we cannot guarantee that third parties to whom your personal information are sent will not do so. Also, you acknowledge that we reserve the right to use or disclose any personal information as needed to satisfy any law, regulation or legal request, to protect and defend the integrity of the website (including to enforce the Terms of Use) and you, to fulfil your requests and/or to cooperate in any law enforcement or regulatory investigation.

Further, we may seek data required to be kept by law needed for legal proceedings or to establish, exercise or defend legal rights (including protection against fraud) necessary to fulfil a contract between you and us (or between you and a third party organisation we represent)

or

needed to protect your vital interests or the vital interests of another person (for instance, if medical data are urgently required after an accident and you cannot give your consent).

Save for this, we do not transfer or disclose personal information we have collected from you in connection with our website activities, to third parties outside the ITL Network.

Please note that if we are, in turn, a promotional selected third party organisation of an unrelated third party organisation (for example where we are not asking you to submit any personal information to us but are simply providing personal information on our website) and a link exists to that other third party organisation's web site where one must visit to take part in that third party organisation's promotion, offer or other activity, then the privacy policy of that other third party organisation will apply instead of ours.

Whilst we make every effort only to tie-in with reputable third party organisations which have a similar high regard for your privacy, you should make sure you are aware of what their privacy policies say, as we are not responsible for the policies and practices of other companies, including those of other members of the ITL Network.

If, in the future, a third party acquires ITL or substantially all of its assets (whether by merger, acquisition, reorganisation or otherwise) customer information, including personal information, may well be one of the transferred assets.

Cookies

A *cookie* is an alphanumeric identifier which we transfer to your hard drive through your web browser when you visit our website. It enables our own system to recognise you when you visit our website, to track the pages you looked at while visiting our website and therefore to improve our service to you. Cookies may also be used to compile aggregate personal information about the areas of our website which are visited most frequently. This aggregate personal information can be

used to enhance the content of our website and make your use of it easier. If you wish to remove our cookie, you may configure your browser to do so. However, if you do so, you may not be able to use certain features on our website. To remove cookies from your web browser or to obtain further details on cookies, including information on persistent and session cookies, please go to <http://www.aboutcookies.org/cookieLaw.asp>

Talent Management Group Cookies

session:, *PHPSESSID:*, *MenuItems:*, *ypArea:*

talentmanagement.com, modelsdirect.com, actor-direct.com, singer-direct.com, musicians-direct.com, entertainer-direct.com, modelsdirect-business.com, internationaltalent.com

These cookies are used by Talent Management to identify a user between page loads. Used to remember certain settings, like which part of the site you were using before you were asked to sign in or register, which part of the menu you are in. *ypArea* remembers which area of the UK map the user clicked.

Third Party Cookies

__utma: to *__utmz:*

Google Analytics

Used to capture clicks made on the group website pages

pvc:1, *uid:*, *uit:*, *uvc:*

Addthis

Social sharing buttons

id:

<http://www.google.co.uk/policies/privacy/ads/#toc-doubleclick>

Ad serving

datr:, *lsd:*

Facebook

Like button and activity

__qca:, *__atuvc:*, *_chartbeat2:*, *mvp_session:*

Nymag.com

Video inclusion in blog

mc:

Quantserve

Anonymous tracking, accessing when, from where and at what time the browser loads its web beacon

pid:, *k:*

Twitter r.twing

Tweet this

UID:, *UIDR:*

scorecardresearch.com

survey invitation pop-up on your Internet usage

__stid:, *uset:*, *__unam*

Sharethis.com

Social sharing buttons

VISITOR_INFO1_LIVE:
youtube.com
Video inclusion in blog

Protection of your personal information

The internet is not a secure medium and we cannot absolutely guarantee the security of your personal information provided over the internet. However we have put in place various security measures as set out below.

We will only provide access to personal information on you to those of the ITL Network who we consider need such access in order to carry out any necessary processing. We have taken appropriate steps to ensure the security of personal information, whether it is stored in computer systems, paper files or other storage media. Further, the ITL website and associated databases are protected by security groups and 128 bit encryption SSL in order to protect your personal information from access by unauthorised persons and against unlawful processing. The website uses the latest technology with full backups. Password protection is provided for all registered users of this website. Passwords are never stored in plaintext and rendered unintelligible through a secure password hashing function.

We expect the same high standards of security and confidentiality of any agents or sub-contractors we employ to process data for us.

We also keep your personal information confidential.

Your rights: Accessing, updating and retention of personal information

We will employ effective procedures and safeguards to ensure that the personal information we hold on you are adequate, relevant and not excessive in relation to the purposes for which they were obtained, as well as accurate and up-to-date. Where we become aware of any inaccuracies in the personal information we hold, we will correct and, where appropriate, delete incorrect personal information. Retention periods are in place to ensure that personal information are only stored whilst they are required for the purposes in question or to meet administrative, legal and regulatory requirements. Where personal information are no longer required, we will ensure that they are disposed of in a secure manner.

On the closure of your account, we may keep your data for up to 7 years after you have cancelled your services with us. We may not be able to delete your data before this time due to our legal and/or accountancy obligations. We may also keep it for research or statistical purposes. We assure you that your personal data shall only be used for these purposes stated herein.

Further, you have the right to require us or selected third party organisations to cease the communication of advertising or marketing material to you, and we will ensure that your request is complied with. This includes the right to withdraw your consent to third-party direct-marketing use of your personal information, at any time.

You have the right to see all the personal information we hold on you. Should you wish to have access to all or a particular part of your data, please contact the Data Protection Compliance Officer by using the methods listed below. Such access will be granted in accordance with the requirements of national legislation. The information will be forwarded to you within an appropriate period of time in accordance with national legislation, but in any event no more than 30 days from the date of such request for access. Where any discrepancies are discovered following your enquiry, we will take immediate steps to validate and, where appropriate, correct our records to ensure that your personal information are accurate and kept up-to-date. We will confirm the actions taken in writing to you within an appropriate period of time in accordance with national legislation, but in any event no more than 30 days after receiving your request to amend our

records. Further, if you would like to change your preferences for contacts from us or other members of the ITL Network, you can let us know by contacting us by using the methods listed below.

Changes to our privacy policy

From time to time, it may be necessary for us to change this privacy policy, so we suggest that you check here periodically.

Links

We reiterate that this website contains links to other websites. Please note that we are not responsible for the privacy policies of such other websites and we advise you to read the privacy policies of each website you visit which collects personal information.

Questions or complaints: contact us

We reiterate that by submitting your personal information to us you consent to the use of that personal information as set out in this privacy policy. If you have any questions, concerns, comments or complaints about this privacy policy and/or our collection, use or accuracy of your personal information, or if you wish to see any of the personal information we hold on you, or if you wish us to stop processing your personal information for any particular purpose or purposes, then please contact us by e-mail at dataprotection@modelsdirect.com or by writing to International Talent Limited c/o The Data Compliance Officer 1 Hornet Court, Hurrincain Way, Norwich, NR6 6HJ or by telephone on 0844 334 0000

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