



# PRIVACY POLICY

## INTRODUCTION

The Ten operates under its trade name **The Ten Talent Ltd.** and is fully committed to respecting and adhering to all data protections laws when collecting, handling or recording the personal information of individuals with whom we work and/or interact. This includes but is not limited to website users, clients, actors, scouts, employees, job candidates, customers, suppliers and anyone else with whom we conduct a working relationship with and/or may need to contact. Employees of our company, its subsidiaries and anyone who may occasionally need to access this data must follow this company policy.

In order to successfully conduct our business activities, we may have to collect and use personal information. This includes when either using our website or using our business services. We recognise and understand that this personal information must be handled and dealt with properly, by whatever means it is collected, recorded and used - whether it be on paper, in computer records or recorded by any other means.

In order to treat your personal information with the utmost care and confidentiality we fully endorse and adhere to the principles of the EU General Data Protection Regulation (GDPR) enforced May 25<sup>th</sup> 2018.

This Privacy Policy will outline how we collect, use and protect any personal data you provide us with, either when using this website and/or our service. It also includes our company procedures in response to any data breach and other rights under the GDPR. Everything outlined in this policy applies to the personal data of our current, past and prospective clients. These are referred to in this policy as relevant individuals

## WHY DO WE HAVE A PRIVACY POLICY?

Our GDPR Privacy Policy is there to protect the interests of all parties and to ensure that The Ten Talent Ltd:

- Complies with GDPR. (including guidelines on the international transferring of personal data)
- Practices fair, lawful and transparent processing of information.
- Protects the rights of our actors, clients, employees and suppliers.
- Is open and concise about how it stores and processes individuals' data.
- Protects itself from the risks of any data breach.

## WHAT WE COLLECT

We **may** collect and store the following information:

### CLIENTS

- Name, company name and job title;
- Contact information including telephone number and email address;
- Business address and postcode;
- Other information relevant to your enquiry.

### ACTORS

- Personal details such as name, address, email address, telephone numbers, passport details, costume measurements.
- Information obtained through our scouting & recruitment process, such as CV's and written references - which may include details of education and previous work experience.
- Information relating to pay administration such as bank account details.
- Images (including promotional images used in third party press or marketing campaigns), show reel videos & self tapes.

All of the above information allows us to represent our actors effectively and efficiently. All such data is kept in appropriately secure files relating to each client.

### EMPLOYEES & FREELANCERS

- Personal details such as name, address, email address & telephone numbers.
- Details of previous work and/or employment.
- Information relating to pay administration such as bank account details.
- Other information to enable us to fulfil a contract or terms & conditions.

### THIRD PARTY CONTRIBUTORS

Personal details such as the name of a director, writer, producer or organisations attached to a project listed on our actors CV.

## HOW WE USE THE INFORMATION WE COLLECT

All of the information that we collect (as listed above) enables us to offer the best possible service of representation to our actors and to conduct the finest possible business services with all our clients and those we engage with. It also enables us:

- To maintain up to date internal record keeping, including records of accounts.
- To enable contact by email, post or phone in relation to any business enquiries made.
- To update our clients on information relevant to enquiries.
- To offer our clients up to date information regarding our actors development and changes to The Ten.

## OUR DATA PROTECTION ACTIONS & PRINCIPLES

In accordance with GDPR principles The Ten Talent Ltd will ensure that:

- All personal data is kept accurate and up to date. Data found to be inaccurate, will be rectified accordingly or deleted immediately.
- Processing will be fair, lawful and transparent
- Data is stored for no longer than is necessary for its given purpose.
- Data be collected for specific, explicit, and legitimate purposes.
- Data collected will be adequate, relevant and limited to what is necessary for the purposes of processing.
- Data will be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures.
- Data will not be transferred to companies, organizations or countries that we do not feel maintain adequate data protection policies.
- Data will not be distributed outside of territories agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

## SECURITY

We are committed to the security of your personal information and endeavour to do all that is reasonably possible to protect your data against unauthorised or unlawful processing, accidental loss, destruction and damage. In accordance with GDPR principles The Ten Talent Ltd will ensure that:

- Secure networks are put in place to protect online data from cyber-attacks.
- Clear procedures are outlined for reporting privacy breaches or data misuse.
- Data protection practices are installed, including but not limited to document shredding, password protection measures, secure locks, data encryption and frequent backups.
- Our data protection provisions will appear on our website.

## DATA BREACHES

We are fully aware that we must remain transparent with you when addressing the risk of data breaches. Despite our efforts to demonstrate the relevant safety and security relating to GDPR principles, we are aware there is always a risk of privacy invasion and potential data breach.

In the unlikely event of such a breach, all details relating to the breach will be disclosed to those affected with immediate effect and without delay.

Should further action be required, the breach will also be reported to the ICO within 72 hours of us becoming aware. This breach will be recorded on our Data Breach Register.

Our appointed **compliance officer** in respect of our data protection activities is Mark Weinman and should be informed immediately of any data breach. He be contacted via email at [office@thetalent.co.uk](mailto:office@thetalent.co.uk).

## LAWFUL REASONS FOR PROCESSING

The Ten Talent Ltd lawful reason for processing your personal information will usually in the first instance be “legitimate interests”. Under this we can process your information if we have a genuine and legitimate business reason and we are committed to the safe well keeping of all information and are not harming any of your rights and interests in accordance with the information being processed.

## YOUR RIGHTS

Anyone in agreement with our policies in relation to the personal data we hold on you has the following rights:

- The right to be informed about the data we hold on you and what we do with it.
- The right of access to the data we hold on you.
- The right for the rectification of any inaccuracies in the data we hold on you, however they become clear to us.
- The right to have your personal data erased in certain circumstances.
- The right to restrict the processing of the data.
- The right to transfer the data we hold on you to another party. Also known as data portability.
- The right to object to the inclusion of any information.
- The right to regulate any automated decision-making and profiling of personal data.

## THIRD PARTY PROCESSING

The nature of our work on behalf of our actors means that we may occasionally be require to share personal information with our clients for the purpose of procuring possible work opportunities. No such transaction of data will take place, without us being fully satisfied that such client or customer has the security measures required, in order to further protect your privacy policies in the same ways as outlined in this policy.

It must be noted that in adhering to GDPR law, we may be required to disclose your data for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## WEBSITE VISITORS

The Ten Talent Ltd ([www.thetalent.co.uk](http://www.thetalent.co.uk)) receives, collects and stores personal information you enter on our website. We are responsible for setting the controls over all the ways in which we collect and process personal information. For this reason, our website uses the minimal amount of tools in order to reduce the amount of information we have access to.

This information is collected via our host platform Wix.com - which may use software tools such as cookies to measure and collect session information, including but not limited to; IP address, page response times, length of visits to certain pages, page interaction information, and methods used to browse away from the page.

Wix.com provides us with the online platform that allows us to offer our best services to anyone visiting our website. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall. Wix.com is fully compliant with GDPR regulations and all sites are HTTPS & SSL secured.

**The Ten Talent Ltd does not, under any circumstances, pass on site-visitor data collected via our website to third parties for any market research, marketing or other commercial purposes.**

**For more information on wix.com privacy policy please follow this address:**

<https://www.wix.com/about/privacy>

Please note that any personal information featured on our website, applying to any of our actors/clients, has first been outlined and agreed via the relevant contracts and agreements between The Ten Talent Ltd and the actor/client in order to best serve the interests of such parties. Such information may include but is not limited to name, images, video and previous experience. Anyone whose information is featured on our website has the right to request it be removed and or changed at any time.

## COOKIES

Our website does use essential cookies in order to keep track of the settings users have selected and actions they have taken on a site.

Essential cookies are required:

- To provide a great experience for our visitors and customers.
- To identify our registered members (users who registered to your site).
- To monitor and analyse the performance, operation and effectiveness of Wix's platform.
- To ensure our platform is secure and safe to use.

In order to remain open and transparent with our website visitors regarding the use of cookies for collecting data we use a cookie flash banner on our site. This gives all site-visitors the opportunity to accept or decline non-essential cookies on our site.

For more information on the types of cookies used on our website please visit

<https://support.wix.com/en/article/cookies-and-your-wix-site>

## SUBJECT ACCESS REQUEST

A subject access request (SAR) is simply a written request made by or on behalf of an individual for the information which he or she is entitled to ask for under section 7 of the Data Protection Act 1998 (DPA). The request does not have to be in any particular form.

If you would like to contact The Ten with a subject access request, please contact our compliance officer Mark Weinman on [office@thetentalent.co.uk](mailto:office@thetentalent.co.uk) and please put '**GDPR Subject Access Request**' in the subject line. We are committed to responding as soon as reasonably possible but aim to reply no later than one month after receiving this request, unless, in accordance with legislation, we decide that an extension is required. We will not charge for complying with a request, unless the request is deemed to be manifestly unfounded, excessive or repetitive.

The Information Commissioner's Office (ICO) acts to protect your rights to report any concerns over the processing and use of your personal information. If you remain unsatisfied with how your subject access request has been dealt with by us please contact them directly at [www.ico.org.uk/concerns/](http://www.ico.org.uk/concerns/) and we will do everything we can to respectfully cooperate.