



TAKE 3 AGENCY PRIVACY POLICY

1. Who we are

This privacy policy is issued by Take 3 Agency Ltd ("we", "us", "our" or "Take 3"), a company registered in England and Wales with company number 12216173. We are a controller of your personal data and are responsible for ensuring that it is properly protected. We are registered with the Information Commissioner's Office (ICO) in the UK with reference ZB478678.

Please see the "How to contact us" section at the end of this privacy policy if you have any questions about this privacy policy or the data we hold about you.

2. This privacy policy

Please read this privacy policy carefully as it contains important information about who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

This privacy policy explains how we collect and process information about you if you are:

- **An Applicant** that has applied to join the Take 3 Agency.
- **An Artist** that is registered with the Take 3 Agency.
- **An Emergency Contact** for one of our registered Artists.
- **A Hirer** that is looking to book an Artist via the Take 3 Agency.
- **A Website Visitor** that is using and engaging with the Take 3 Agency website.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK data protection laws. If you are located in the European Economic Area (EEA), we are also subject to the EU General Data Protection Regulation (EU GDPR) and other local laws in relation services we offer to individuals in the EEA.

3. Our collection and use of your personal data

Personal data means any information about an individual from which they can be identified, whether directly or indirectly.

How your personal data is collected

We collect personal data about you in different ways, including:

- **Direct interactions.** You may give us your personal data when you submit an application form to join our agency, audition with us, complete your registration with our agency, access our website, log into our Artist Portal (accessible via our website), send us feedback, complete a

survey that we provide to you or contact us including to raise initial enquiries or to book an Artist.

- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data (defined below) about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Publicly available sources.** If you are an **Applicant** or an **Artist**, we may collect Identity, Profile and Contact Data (defined below) about you from various publicly available sources including your social media profiles, for example your Instagram profile.
- **Third parties.** If you are an **Emergency Contact** for one of our registered Artists, we will have collected your name and contact information from that Artist.

Personal data we collect about you

The personal data we collect about you depends on how and why you engage with us.

If you are an Applicant we may collect the following information about you:

- **Identity Data** – full name, marital status, title, date of birth, gender, right to work information and confirmation that you hold a valid passport. We do not request to see a copy of your passport at application stage.
- **Contact Data** - email address and telephone number(s).
- **Profile Data** – your headshot, information available via reel websites or Instagram pages that you share with us, your CV and additional information about your skill sets, experience and training background.
- **Usage Data** - any survey responses you may provide to us from time to time.
- **Special Category Data** – nationality, ethnicity and information about relevant health issues and disabilities, that you may choose to disclose to us. Special Category Data is personal data that needs more protection because it is sensitive, we therefore treat this information with additional care and implement robust security measures appropriate for this type of data.
- **Marketing and Communications Data** - your preferences in receiving marketing from us and your communication preferences.

If you are an Artist, in addition to the information we have collected during the application phase we may collect the following information about you:

- **Identity Data** – full passport details, national insurance number, driving licence number.
- **Contact Data** – residential address and your emergency contact information.
- **Profile Data** – your measurements and your username, password, interests and preferences for the Artist Portal (available via our website).

- **Financial Data** - bank account details,
- **Availability Data** – details of your schedule and availability.
- **Usage Data** - any survey responses you may provide to us from time to time.
- **Special Category Data** – information about your sexual orientation that you may choose to disclose to us. We treat this information with an additional level of care and only process it where we are legally permitted to.
- **Criminal Conviction Data** – DBS check results where these are required by a particular Hirer and you choose to disclose these to us. In these circumstances we receive the results from you on a voluntary basis and share them on with the relevant Hirer with your explicit consent.
- **Marketing and Communications Data** - your preferences in receiving marketing from us and your communication preferences.

If you are an **Emergency Contact** we may collect the following information about you:

- **Identity Data** - full name.
- **Contact Data** - address, email address and telephone number(s).

If you are a **Hirer** we may collect the following information about you:

- **Identity Data** - full name.
- **Contact Data** - address, email address and telephone number(s).
- **Usage Data** - any survey responses you may provide from time to time.
- **Marketing and Communications Data** - your preferences in receiving marketing from us and your communication preferences.

If you are a **Website Visitor** we may collect the following information about you:

- **Identity Data** - full name.
- **Contact Data** - address, email address and telephone number(s).
- **Technical Data** - internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Usage Data** - data about how you use our website including survey responses.
- **Marketing and Communications Data** - your preferences in receiving marketing from us and your communication preferences.

We need some of the above listed personal data to provide you with the services you request from us. If you do not provide personal data we ask for, it may delay or prevent us from providing our services to you.

We may also collect and use **Aggregated Data** such as statistical or demographic data for our own internal business purposes. Aggregated Data may be derived from your personal data but is not considered personal data in law as it does not include information that can directly or indirectly identify you.

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a lawful basis for doing so, which includes:

- **Consent:** where you have given us clear consent for us to process your personal data for a specific purpose.
- **Contract:** where our use of your personal data is necessary to fulfil a contract we have with you, or because you have asked us to take specific steps before entering into a contract.
- **Legal obligation:** where our use of your personal data is necessary for us to comply with the law (not including contractual obligations).
- **Legitimate interests:** where our use of your personal data is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal data which overrides our legitimate interests).

Under data protection law, we can only use your **Special Category Data** or **Criminal Conviction Data** if an additional special category processing condition applies. We may collect Special Category Data about you if you are an **Applicant** or an **Artist** and Criminal Conviction Data if you are an **Artist**, as detailed above. Any **Special Category Data** or **Criminal Conviction Data** we collect about you we collect on a voluntary basis and we rely on your explicit consent to collect and process this information. We never require you to provide us with Special Category Data or Criminal Conviction Data, however note that DBS checks are required by some Hirers for certain jobs.

The table below explains what we use your personal data for and why, as well as what our legitimate interests are where we are relying on our legitimate interests as the lawful basis to process your personal data:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest and any additional processing conditions
Where you are an Applicant , to process and make a decision about your application, invite you for audition and review your audition.	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you. (b) Necessary for ours and a third party's legitimate interests (to enable us to make a decision about onboarding you with our agency)
To register you as an Artist .	(a) Identity (b) Contact	(a) Performance of a contract with you.

	(c) Profile (d) Financial (e) Availability	(b) Necessary for ours and a third party's legitimate interests (to set up and manage your registration with our agency)
Where you are an Applicant or an Artist , to understand your suitability and preferences for certain jobs and roles and to make reasonable adjustments for you in relation to your application, any audition or any roles.	(a) Special Category Data (b) Criminal Conviction Data	(a) Consent – lawful basis (b) Explicit consent - additional processing condition
Where you are an Artist or a Hirer , to provide our services to you, including: (a) to manage payments, fees and charges (b) to collect and recover money owed to us	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us and to provide our services to you)
If you are an Emergency Contact , to hold your information on file and to make contact with you in the event of an emergency involving the Artist that you are an emergency contact for	(a) Identity (b) Contact	Necessary for ours and a third party's legitimate interests (to enable us to respond appropriately in an emergency scenario)
For all categories of data subject, to manage our relationship with you which will include: (a) Notifying you about changes to our services, terms or privacy policy (b) Asking you to leave a review or take a survey (c) Responding to queries you may raise and requests for our services	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to manage our relationship with you, keep our records updated and to study how Artists and Hirers use our services)
For all categories of data subject, to administer and protect our business Where you are a Website Visitor , also to administer and protect our website (including troubleshooting, data analysis, testing, system maintenance,	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)

support, reporting and hosting of data)		(b) Necessary to comply with a legal obligation
For all categories of data subject except for Emergency Contacts, to deliver relevant website content and marketing materials to you and measure or understand the effectiveness of the marketing we send to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for ours and a third party's legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy and to provide you with relevant content which may be of interest)
For all categories of data subject except for Emergency Contacts, to use data analytics to improve our website, marketing, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to develop our client relationships, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
For all categories of data subject except for Emergency Contacts, to make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Profile (e) Usage	Necessary for ours and a third party's legitimate interests (to develop our services and grow our business and to provide you with relevant content which may be of interest)

4. Who we share your personal data with

We routinely share personal data with the following external service providers:

- Those we use to help provide our services to you, e.g. payment service providers and Xero our accounting software provider. We also use Typeform to collect and process your application if you are an **Applicant** and Syngency and Tagmin our casting and talent management platforms if you are an **Artist**.
- Those we use to help us run our business, e.g. Google our email and document processing provider, HubSpot our CRM platform and WhatsApp our communications provider.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

If you are an **Artist**, we also routinely share your personal data with relevant Hirers that are looking to book an Artist via our agency. This will include both production companies and individuals working for

production companies, for example make-up artists or directors. We only share personal data that is relevant and necessary in relation to the individual's role.

We may from time to time disclose your personal data to:

- External professional advisors, e.g. our lawyers or accountants.
- Law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share personal data with other third parties, such as potential buyers of some or all of our business or during a business re-structuring. Alternatively, we may seek to acquire other businesses or merge with them. Usually, data will be anonymised but this may not always be possible. The recipient of the personal data will be bound by confidentiality obligations.

5. Transferring your personal data out of the UK and EEA

To provide services to you, it is sometimes necessary for us to share your personal data outside the UK and EEA, for example, with our service providers that are either located outside the UK or EEA, or that transfer personal data outside of the UK and EEA.

Transfers of personal data outside of the UK are subject to special rules under UK data protection law. This is because non-UK countries do not have the same data protection laws as the UK.

Transfers of personal data outside of the EEA are subject to special rules under EU data protection law. This is because non-EEA countries do not have the same data protection laws as the EEA.

We will ensure that any transfer of personal data outside of the UK or EEA as applicable, complies with data protection laws and that all personal data will be secure.

As a result, when we transfer personal data outside of the UK and EEA we will ensure that the transfer complies with data protection laws by following one of the below steps:

- Confirming that the recipient is located in a country which has been recognised as having an adequate level of protection for personal data.
- Putting in place safeguards (such as approved standard contractual clauses) so that you have enforceable rights and effective legal remedies.
- Confirming that a specific exception applies under data protection law.

For more information about our international transfers, please contact us using the information below.

6. Cookies and other tracking technologies

A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use our website. We use cookies on our website. Cookies help us recognise you and your device and store some information about your use of our website.

7. Marketing

We may use your personal data to send you updates (by email, text message, telephone or post) about our services, including newsletters, exclusive offers, promotions or information about new services.

We often have a legitimate interest in using your personal data for marketing purposes (see the table above). This means we do not usually need your consent to send you marketing information. However, where consent is needed, we will ask for this separately and clearly.

You always have the right to opt out of receiving further promotional communications by using the “unsubscribe” link in emails.

We may ask you to confirm or update your marketing preferences if there are changes in the law, regulation, or the structure of our business.

Please note that we may also send you other communications in relation the services that we provide or in order to respond to queries you have raised, such communications are service communications and are not considered a form of marketing communication.

8. Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data (the right of access)
Rectification	The right to require us to correct any mistakes in your personal data
To be forgotten	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.

Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
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For further information about your rights please contact us or see the guidance provided by the UK ICO on individuals' rights or if you are located in the EEA, the guidance provided by your local supervisory authority.

If you would like to exercise any of your rights, please:

- Email, call or write to us — see the “How to contact us” section at the end of this policy.
- Let us have enough information to identify you e.g. your full name and address and details of the nature of your relationship with us, for example whether you are an **Applicant, Artist, Emergency Contact, Hirer** or **Website Visitor**.
- Let us have proof of your identity if requested.
- Let us know which right you want to exercise and the data to which your request relates.

9. How long your personal data will be kept

We will not retain your personal data for longer than necessary for the purposes set out in this privacy policy. Different retention periods apply for different types of personal data.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

As an indication, if you register with us as an **Artist**, we will keep your personal data whilst you are registered with our agency. Thereafter, we will keep your personal data for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf.
- To show that we treated you fairly.
- To keep records required by law.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

You can request further details of retention periods for different categories of your personal data by contacting us.

10. Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business

need to access it. Those processing your data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

11. How to complain

Please contact us if you have any query or concern about our use of your data (see below “How to contact us”). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the ICO or any relevant European data protection supervisory authority. The ICO may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113

12. How to contact us

You can contact us using the contact details below if you have any questions about this privacy policy or the data we hold about you, to exercise a right under data protection law or to make a complaint.

Contact email address: hello@take3agency.com.

Changes to this privacy policy

This privacy policy was last updated in July 2023. We keep our privacy policy under regular review to make sure it is up to date and accurate. If we change our privacy policy from time to time, we will post the details of any changes on our website. We may also take reasonable steps to notify you if such changes affect how your personal data is processed.