

GDPR Privacy Policy

Use of the Website By accessing or using the Website, you agree to the terms of this Policy. If you do not agree with any of these terms, please do not use the Website. This Policy only applies to data collected on the Website, and does not apply to websites of affiliated companies. We reserve the right to modify the Policy at any time without notice. Any changes to our Policy in the future will be posted on the Website and, where appropriate, notified to you by e-mail. You are responsible for regularly reviewing the Policy for any updates and/or changes to the Policy.

2. Information We Collect

We collect information about you in two ways.

First, we collect personal information provided to us directly by you, such as when you apply to become a model; place a booking; e-mail us; authenticate an order; or request information from us. Second, we automatically receive information from your browser, including but not limited to your Internet protocol (IP) address, information about your browser, "cookie" and "web beacon" or "web bug" information (see section 3 below)

What we collect:

We may collect 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 or to enable us to fulfil a contract or terms & conditions.

Models & Actors represented by the agency

Name;
Contact information including telephone number and email address;
Demographic information including address and postcode;
Statistics and work experience;
Images and videos;
Preferences and interests;
Other information relevant to promoting you for work in the correct areas and to enable us to fulfil a contract or terms & conditions.

New Models & Actors applying to the agency

Name;
Demographic information;
Images/videos and statistics to enable us to assess whether you are suitable to be offered a place on the agencies books.

Employees and Freelancers

Name;
Contact information including address, telephone number and email address;
Details of previous work and/or employment;
Other information to enable us to fulfil a contract or terms & conditions.

Lawful Reasons for Processing

Clients & Suppliers

For Business to Business clients and contacts, our 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 not harming any of your rights and interests. Once you enter into a contract with us our lawful reason becomes “contractual obligation”. This also includes steps taken at your request before entering into a contract.

Models, Actors & Employees

For Business to Consumer clients and contacts, our lawful reason for processing your personal information will usually be “contractual obligation” e.g. to supply services you have requested, or to fulfil obligations under an employment contract or terms and conditions. This also includes steps taken at your request before entering into a contract.

WHAT WE DO WITH THE INFORMATION WE COLLECT

Clients

We require this information to understand your needs and provide you with a better service and in particular, for the following reasons:

To provide ongoing customer service and maintain internal record keeping including for accounting purposes;

To enable contact by email or phone in relation to the enquiry you have made with us;

To periodically send update emails about new models/actors or other information relevant to your enquiry. You may unsubscribe from receiving these emails at any time by clicking the unsubscribe link which is included at the bottom of all our update emails.

Models & Actors

We require this information to understand the areas of work we can put you forward for and in particular, for the following reasons:

Internal record keeping including accounting purposes;

To keep our website up-to-date with the correct information for clients;

We may contact you by email or phone in relation to work enquiries;

We may periodically send update emails using the email address which you have provided. You may unsubscribe from receiving these emails at any time by clicking the unsubscribe link which is included at the bottom of all our promotional emails.

New Models applying to the agency

We require this information to assess whether you are suitable to be offered representation with the agency.

Employees and Freelancers

We require this information, in order to fulfil your employment contract.

3. Cookies and Web Beacons/Web Bugs

3.1 A cookie is a very small file sent to your web browser by a website's server to process information more efficiently. A cookie file can contain information such as a user ID that the Website uses to track the pages you have visited, however the only personal information a cookie can contain is information you supply yourself. Cookies cannot read data off your hard drive, destroy files, or send viruses. Cookies basically avoid duplication of information. For instance, by setting a cookie on the Website, you would not have to log in a password more than once and save time while visiting the Website. Cookies can also enable us to track and target the interests of our users to enhance their experience on our Website. You can set your browser to reject a cookie. If you do so, you will still be able to use the Website, but you may be limited in some areas of the Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our Website. For more information about cookies and how to turn them off, please visit the Interactive Advertising Bureau's website at <http://www.allaboutcookies.org>.

3.2 A web beacon or web bug is a file used to monitor your journey around a single website or collection of websites. They may be used in association with cookies to understand how visitors interact with the pages and content on the pages of a website. Being able to recognize you enables us to make the Website more user friendly.

4. Use of the Collected Information

4.1 We generally use information provided by you to enhance your experience of the Website, to customize the advertising and content you see, to fulfill your requests for products or services, to improve our products and services, to contact you, and to gather and review statistical information.

4.2 By providing us with your details, you agree that we may send you marketing and promotional material or other information about our products and services. We may also send you surveys or market research questionnaires, which you may or may not choose to participate in.

4.3 We may use tracking information that is automatically sent to us to determine which areas of our Website are most (and least) popular based on traffic to those areas. We do not track what individual users read, but rather how well each page of the Website performs overall. This helps us continue to build a better service for our users.

5. Information Sharing and Disclosure

5.1 We may disclose your personal information to any member of our group of companies, which means our subsidiaries, our ultimate holding company and its subsidiaries, (as defined in section 736 of the UK Companies Act 1985).

5.2 We may disclose your information to third parties under the following circumstances:

5.2.1 where, in order for us to provide our products and services to you, we may need to appoint other organizations to carry out some of the processing activities on our behalf. These will include, for example, delivery organizations and mailing houses. In these circumstances, we will take all steps reasonably necessary to endeavour that your information will be used in a manner consistent with the Policy;

5.2.2 in response to subpoenas, court orders, or legal proceedings, or to establish or exercise our legal rights or defend against legal claims;

5.2.3 where it is necessary to share information in order to investigate, prevent or take action regarding illegal activities, suspected fraud, potential threats, violations of our terms and conditions, or as otherwise required by law; or

5.2.4 in connection with the sale, merger, joint venture, acquisition, or reorganization of us or any of our subsidiaries or parent companies and their respective assets, where we may have to disclose your information to our new business partners or owners.

5.3 Where you have consented by “opting in” when providing us with details, we may also allow carefully selected third parties, including in particular, our commercial sponsors, to contact you occasionally about products and services which may be of interest to you. They may contact you by post, telephone or fax, as well as by e-mail. If you change your mind about being contacted by these companies in the future, please contact the Privacy Policy manager to update your preferences at info@gingersnap.co.uk.

5.4 We may also pass aggregate information on the usage of the Website to third parties but this will not include information that can be used to identify you.

5.5 Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

6. Use of Your Information outside the European Economic Area (“EEA”)

6.1 The information you provide to us will be held on our computers and may be accessed by or given to our staff, companies within our group or other third parties who may be located outside the EEA. These parties act for us for the purposes set out in the Policy or for other purposes approved by you. Please note that if you submit your data to us, you will be giving your consent to the data being transferred outside the EEA.

6.2 Countries outside the EEA and the USA do not always have strong data protection laws. However, we will always take reasonable steps to ensure that your information is used by third parties in accordance with this Policy.

7. Security and Data Retention

7.1 We endeavour to protect personal information under our control in order to prevent the loss, misuse, unauthorized access, disclosure or alteration of your information.

7.2 Unfortunately, the transmission of information via the internet is not completely secure. Although we will take reasonable steps to protect your personal data, we cannot guarantee the security of your data transmitted to our Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

7.3 We will retain your information for a reasonable period as long as the law requires.

8. Links to Other Websites

The Website may contain links to other websites that are owned and operated by third parties. Even if the third party is affiliated with us, we have no control over these linked websites, all of which have separate privacy and data collection practices. Please be aware that we cannot guarantee or be

responsible for the data collection practices of such other websites. We encourage you to read the privacy statements for those linked websites.

9. Privacy of Children

The Website is not designed for, or directed to children. As such, we do not intend to collect and will not knowingly collect any personal information from children below the age of 16 without parental consent. If you are under 16, you must ask your parent or guardian before you send any information to us or ask us to e-mail anything to you. By sending us any information or asking us to send you information you are confirming that you have received the informed consent of your parent or guardian. Parents are encouraged to review their children's e-mail and internet activities to ensure that the Website is being used by their child in accordance with parental consent and this Policy. Should parents wish to access their children's personal information held by us, they should contact the Privacy Policy Manager at info@gingersnap.co.uk

10. Accessing and Updating

YOUR RIGHTS UNDER GDPR

Your principle rights under GDPR are:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making, including profiling.

You are entitled to see the information that we hold about you or your child and you may ask us for a copy of such information. We may charge you a small administration fee of £10 for providing you with these details. If you believe that any of the data we hold about you or your child has changed or is incorrect, please ask us to change or update such data by contacting, the Privacy Policy Manager at info@gingersnap.co.uk.

11. Your Choice

You may choose to stop receiving communications from us at any time. To request removal from our mailing list, to access your personal information or to ask us to remove your personal information from our database, please send a message with your request to the Privacy Policy Manager at info@gingersnap.co.uk.

12. Questions and Contacting Us

If you have any comments, questions or suggestions relating to our use of your information, the information collected or your use of the Website please contact the Privacy Policy Manager at info@gingersnap.co.uk.