

## Privacy Policy

### Introduction

We are Zebedee Talent Ltd, and we are the data controller in respect of your personal data. We are a company registered in England and our company registration number is **11671454**. If you have any queries about our handling of your personal data, we can be contacted at our registered office at 104 Hague, Pat Midgley Lane, Sheffield, S2 5DW or via email on [info@zebedeetalent.com](mailto:info@zebedeetalent.com)

This policy explains how we collect and use the personal data that you provide to us 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 it will be treated.

### 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 staff comply with Data Protection Legislation (UK GDPR and Data Protection Act 2018) in relation to the personal data we handle.

All of our staff and associates are obliged to comply with this Privacy Policy when dealing with personal data.

### Personal data – what we collect, how we collect, use and disclose it

#### Talent (including prospective talent)

##### Data we may collect:

- Your name, address, contact details, education and employment history;
- Identification documentation;
- Right to work status;
- Contact details for next of kin / emergency point of contact;
- Banks details and identifiers such as National Insurance number;
- Images / videos of you;
- Applications, reviews, notes and records of your progress;
- **Special Data** – collected because Zebedee is an inclusive talent agency, supporting models with disabilities, visible differences, non-binary and trans.
  - Racial or ethnic origin
  - Genetic data
  - Data concerning health or disability
  - Sexual orientation
  - Gender reassignment

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## **How we collect data:**

- Application form;
- Email and telephone correspondence
- Notes and records kept on file during your engagement with Zebedee Talent Ltd, from meetings with us, any feedback from clients;
- Publicly available sources such as magazines, press articles, documentaries and social media.

## **How we may use your personal data:**

Under the UK GDPR and Data Protection Act 2018 the lawful basis's we rely on for processing this information are:

### **Legitimate Interests**

- Internal administration and management purposes;

### **Contract**

- Assessing suitability / eligibility as talent;
- Fulfilling our contractual obligations to you / clients

### **Legal**

- Fulfilling our legal obligations to you/clients

### **Employment - Article 9(b)**

- Condition for processing Special Category data as listed above

## **Who we may disclose your personal data to (where relevant):**

- Our third party service providers for the operation of our business;
- Our clients where necessary to fulfil contractual obligations;
- Any affiliate talent agencies (eg: engaged by us to provide modelling and or talent agency services on their behalf in the UK and in a jurisdiction outside of the UK);
- Other third parties such as our legal / professional advisers and government departments.

## **How long we will retain your data for:**

- Talent personal data relevant to the purpose shall be kept for up to 20 years and we shall not retain this data for longer than is necessary. We will ensure we keep all personal data up to date and shall delete any personal data which is not necessary for the purpose.

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## **Clients (including prospective clients):**

### **Details such as:**

- Your name and business information;
- Relevant identification document where necessary;
- Payment details

### **How we collect data:**

- Email and telephone correspondence;
- Via our accounts team to collate supplier information when engaged in bookings;
- Publicly available sources such as magazines, press articles, documentaries and social media.

### **How we may use your personal data:**

Under the UK GDPR and Data Protection Act 2018 the lawful bases we rely on for processing this information are:

#### **Legitimate Interests**

- Internal administration and relationship management purposes;
- Commercial (eg credit worthiness)

#### **Contract**

- Fulfilling our contractual and legal obligations to you / clients.

#### **Legal**

- Fulfilling our legal obligations to you/clients (eg anti-money laundering)

### **Who we may disclose your personal data to (only where relevant):**

- Our third party service providers who provide relevant support for the operation of our business;
- Our talent where necessary to fulfil contractual obligations;
- Any affiliate talent agencies (eg: engaged by us to provide modelling and or talent agency services on their behalf in the UK and in a jurisdiction outside of the UK);
- Other third parties such as our legal / professional advisers and government departments.

### **How long we will retain your data for:**

- Client personal data relevant to the purpose shall be kept for up to 6 years and we shall not retain this data for longer than is necessary. We will ensure we keep all data up to date and shall delete any personal data which is not necessary for the purpose.

## **Users of our website:**

### **Details such as:**

- Application details

### **How we collect data:**

- Via online application form and offered links to social media;
- When you contact us via email or telephone;
- Via cookies to monitor performance of hosting site.

### **How we may use your personal data:**

Under the UK GDPR and Data Protection Act 2018 the lawful bases we rely on for processing this information are:

### **Legitimate Interests**

- Via cookies to monitor performance of hosting site.

### **Contract**

- Fulfilling our contractual obligations to you -Internal administration to move forwards with castings;

### **Who we may disclose your personal data to (only where relevant):**

- Our third party service providers who provide relevant support for the operation of our business;
- Where you have given us clear consent to do so, we may pass to third parties to provide you with information about services we feel may interest you;
- We shall only transfer personal data to third parties which is limited to the relevant purpose and is adequately protected.

### **How long we will retain your data for:**

- Our website users' personal data shall be kept for 6 years and we shall not keep your personal data for longer than is necessary.
- We will ensure we keep all personal data up to date and delete any personal data which is not necessary for the purpose.

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## **Transfer of Data between Jurisdictions**

Personal data may be transferred to one of our Affiliate Talent Agencies (eg: engaged to us to provide modelling and/or talent agency services on their behalf in the UK or in a jurisdiction outside of the UK) 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.

## **Your Rights**

Under UK GDPR and Data Protection Act 2018, you have rights including:

**right of access** - You have the right to ask us for copies of your personal information.

**right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

Should you wish to make a request in line with your rights as an individual, please forward it to us at [info@zebedeetalent.com](mailto:info@zebedeetalent.com) and we will respond to the request ensuring we following UK GDPR and Data Protection Act 2018.

## **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. Staff abide are aware of and abide by UK GDPR and Data Protection Act 2018 and its principles in processing personal data.

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## **Cookies**

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website. For detailed information on the cookies we use and the purposes for please see appendix. Please note that it is possible to disable cookies being stored on your computer by changing your browser settings, however our website may not function properly and/or some features may not be available to you in that case. Our website places cookies, which are small data files, on your computer or mobile device. This is a common practice for all websites. Cookies help us provide you with a good experience when you browse our site and also allow us to improve our site. Cookies cannot be used to identify you personally. To read more about cookies and how to disable them see Wikipedia or [www.aboutcookies.org](http://www.aboutcookies.org)

## **Changes to our privacy policy**

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

## **Contacts and complaints**

If you have concerns or questions about the way we have handled your personal data, we encourage you to contact us and we will seek to resolve any issues or concerns you may have. Please contact us at [info@zebedeetalent.com](mailto:info@zebedeetalent.com).

You have the right to complain to the Information Commissioner's Office (ICO) if you are concerned about the way we have processed your personal data. Please visit <https://ico.org.uk/> for further details.

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