

## JPAM Ltd Privacy Policy (V2 Updated Feb 2023)

This Privacy Notice describes how we collect and use personal data prior to you being a client of the agency, during the agent client relationship and once the relationship has ended. This notice does not form part of our agent/client agreement.

### **Our contact details:**

Name: JPAM Ltd

Address: c/o Claydon Business Park, Unit 81 Centaur Court, Great Blakenham, Ipswich IP6 0NL

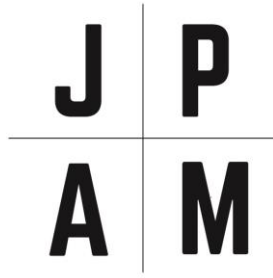
Phone Number: +44 (0)7504467614

E-mail: jo@joprobitts.com

### **The type of personal information we collect:**

We will collect, store, and use the following categories of personal data about you:

- Details of contractual negotiations conducted on your behalf with third parties.
- Details of the projects/engagements you are or have been involved in.
- Payment and fee details including any interest in and connection with any intermediary through which your services are supplied and royalty payments.
- Merchandising, commercial tie-up rights, advertising, intellectual property rights and other information relating to exploitation of your rights.
- Disputes, disciplinary and grievance information relating to projects/employment/work you are or have been involved in with third parties.
- Health information including mental health.
- Your marital status, family, lifestyle or social circumstances and other affairs, if relevant to the agency client relationship (for example where we liaise with third parties on your behalf in respect of your reputation or reliability).
- Casting information such as headshots, body measurements, and skin, hair and eye colour.
- Information about criminal convictions or offences.



Some of the personal data above may also fall within "special categories" of more sensitive personal data such as:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records.
- Genetic information and biometric data.

#### **How we get the personal information and why we have it**

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- As part of and during the agency client engagement process prior to you engaging us as your agents (e.g. submissions, CVs, client information forms, and references); and
- As part of the agency client relationship to enable us to fulfil our contractual obligations to you under our agency client agreement.

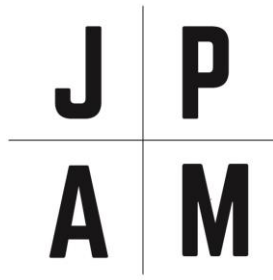
We also receive personal information indirectly, from the following sources in the following scenarios:

- Information generated about you in fulfilling our contractual obligations under the agency client agreement; and
- Information about you that is available from public sources (e.g. IMDB, Wikipedia, LinkedIn, Spotlight).

We use the information that you have given us:

For the purpose of acting for you as your agent. The situations in which we may use your personal data are set out below along with the legal grounds we will rely upon to process your data. Some of the legal grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

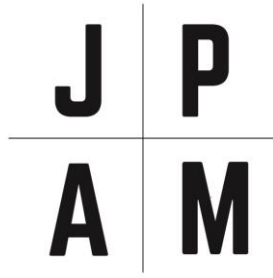
The processing of your personal data is necessary for the performance of an agency client agreement or to enable us to take steps at your request prior to entering into an agency client agreement:



- To make a decision about whether we take you on as a client.
- Determining the terms of our agency client agreement with you.
- Keeping you up to date and reporting to you.
- To represent you.
- To find and put you forward for new projects and engagements.
- Negotiating the terms of your engagement on new projects with third parties including (but not limited to):
  - The scope of your services
  - Fees, payments and royalties
  - Work benefits and expenses
  - Working hours, dates of the engagement, place of work and your work environment
  - Restrictive covenants
  - Disputes
  - Publicity
- Managing your affairs and servicing contracts.
- To negotiate your intellectual property rights, licence fees and royalty payments.
- To collect and receive payments on your behalf, to undertake invoicing, to collect and pay VAT and to deduct our commissions.
- Making arrangements for the termination of any agency client relationship.

**Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:**

1. The processing of your personal data is necessary for our legitimate interests of running an agency business:
  - Business management and planning.
  - Dealing with legal disputes involving you and/or our employees.
  - Equal opportunities monitoring.
  - Updating client records.



- To monitor and keep records of our communications with you and our staff.
  - For market research and analysis and developing statistics.
  - For some direct marketing communications.
2. To comply with our legal obligations
- Accounting and auditing of our business.

To comply with any obligations under employment law and/or under the Employment Agency Standards.

3. Consent

- For some direct marketing

**We may share this information with other organisations or individuals.**

We may have to share your personal data with third parties, including third-party service providers and other entities. We require such third parties to respect the security of your data and to treat it in accordance with data protection legislation.

A situation where we will often provide your personal data to third parties is where it is necessary for the performance of the agency client agreement with you such as where we put you forward for new projects or where certain categories of your personal data are required by a third party in respect of a project you have been engaged on.

We may place your artist/performer profile on a third-party casting database such as, but not limited to, Spotlight, or casting networks globally.

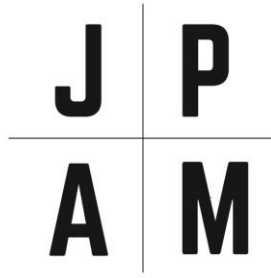
To market your work abroad we may, after discussion with you, engage a suitable co-agent. In this situation, we will seek your consent before providing any of your personal data to the co-agent.

We will not share or use your personal data in a way you would not expect under the agent client agreement.

We may also share your personal data with third parties where required by law or where we have another legitimate interest in doing so.

**Transferring your personal data outside the EU**

JPAM Ltd is based in the UK, but sometimes we may need to transfer your personal data outside the UK territories. A common example is where we need to provide your personal



data to a company or organisation outside the UK territories as a requisite to you providing your services to that company or organisation.

We will seek and secure your explicit consent for transferring your personal data outside the UK territories in circumstances where (a) the transfer is not necessary for the client agency agreement (b) the prevailing regulatory body has not made an adequacy decision in respect of the country in which the recipient of the personal data is based (c) the transfer of the personal data is not subject to appropriate safeguards as set out in Article 46 of the GDPR (d) there are no binding corporate rules in place (e) no other derogation is applicable.

### **How we store your personal information**

Your information is securely stored. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of the agency client agreement and satisfying any legal, accounting, or reporting requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which is available from JPAM Ltd.

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.

Once you are no longer a client of the agency we will retain your personal data in accordance with our data retention policy.

### **Your data protection rights**

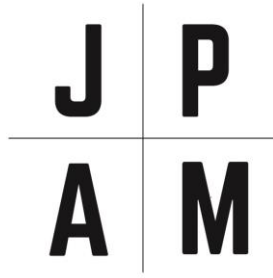
Under data protection law, you have rights including:

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

**Your 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.

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

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



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

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [jo@joprobitts.com](mailto:jo@joprobitts.com) if you wish to make a request.

### **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at [jo@joprobitts.com](mailto:jo@joprobitts.com)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House, Water Lane  
Wilmslow, Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

We reserve the right to update this Privacy Notice at any time.

If you have any questions about this Privacy Notice, please contact JPAM Ltd.