



PRIVACY NOTICE

1. Introduction

We are Origins of CJM, a business that focuses on communication, journalism, and media, and supports artists on their career journey by building an artist's image by providing a range of services including press coverage, events management and booking talent service.

In order to deliver our services, we have developed a contact Database of individuals, and organisations who we have previously interacted with us or who we work with and support.

We have developed this privacy notice in order to be as transparent as possible about the Database and the personal information contained within. This privacy notice has been written for the individuals whose personal information is contained in the Database (referred to in this notice as "you"). We treat data privacy very seriously and comply with all aspects of the UK's data protection legislative framework which includes the UK General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018. This privacy notice tells you what to expect us to do with your personal information when you make contact with us or use one of our services.

2. Data Controller

The UK GDPR applies to controllers. Origins of CJM is the controller for the personal information we process, and we therefore determine the purpose and means of processing personal information. As data controllers, we are responsible for ensuring our systems, processes, suppliers, and People comply with Data Protection Legislation in relation to the personal data we handle.

When using, collecting, and disclosing personal data, we follow the key data protection principles.

3. What information does this privacy notice contain?

We ask that you read this privacy notice carefully as it contains important information about:

- what personal information is stored in the Databases;
- how and for what purposes the personal information held in the Databases is used (this is known as processing);
- the lawful basis for such processing;
- how and from where we collect your personal information;
- who has access to the information contained in the Databases;
- third parties with whom we may share your personal information;
- how long we keep your personal information;

- how you can manage your communication preferences; and
- where to find out more information about your privacy rights

4. What personal information do we collect and store in our database?

The following categories of personal information are held in the Database:

- your name, address, contact details, education and employment history;
- identification documentation;
- financial information including bank details and identifiers (e.g. National Insurance numbers);
- emergency contact number(s)
- Age, Height, Measurements (Model representation)
- images/photographs of you; and
- reviews/feedback relating to your ability as/to become a Model.
- Additional information may be processed where it is provided by you, for example in correspondence, in connection with a Model, or in letting us know your interests and how/when you wish to be contacted by us.

We also keep details of your gender, racial or ethnic origin and physical or mental health or condition, if you have provided these to us voluntarily.

Your personal data will be collected from various sources including:

- application form/CV;
- when you contact us via email or telephone;
- notes and records kept for the duration of your engagement with us as a Model (including details of any complaints, breaches of the terms of your contract with us, and meetings with us regarding our relationship and your engagement as a Model);
- from our Clients (including reviews/feedback, and images and photographs); and
- publicly available sources such as magazines, press articles, documentaries, and social media.

5. What is the personal information used for?

The main purpose of the Database is to enable us to manage our communications with people and organisations and to represent our clients.

Your personal data will be used for the following purposes:

- internal administration and management purposes;
- assessing suitability/eligibility and/or fitness to be a Model;
- fulfilling our contractual obligations to you;
- fulfilling our contractual obligations to our Clients; and
- fulfilling our legal obligations.

Photographs and images of you, and your name, employment history, education, and reviews and feedback relating to your ability as a Model, may be used in our marketing and promotional material including our Website and pitches to Clients.

Disclosure:

Your personal data may be transferred to:

- our Clients, for the purposes of fulfilling our contractual obligations; and
- other third parties such as our legal and other professional advisers and government departments.

We shall only transfer personal data to third parties which is limited to the relevant purpose and is adequately protected.

Retention Period:

Model personal data and client representation data relevant to the purpose shall be kept for 10 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 shall immediately and permanently delete any personal data which is not necessary for Types of personal data:

Information such as your:

- name and business information;
- identification documentation; and
- payment details

6. Where do we obtain personal data from?

The personal information contained in our database has initially been developed from information provided by individuals and organisations who we have engaged with. The information contained in the Database may be added to with information that has come from a variety of sources including:

- information obtained directly from you
- information obtained from organisations that have an association with us
- information collected at events or activities that we run
- information that is publicly available including from on-line sources and social media

When you contact us via email or telephone, we may collect any personal data you provide you provide to us. All additional personal data is collected when supplied to us or created by us in connection with a particular matter on which we are engaged.

7. The legal basis

We will only store your personal information in the databases where we can do so lawfully. The data protection legislative framework provides for a limited number of reasons for processing personal information.

We are relying on the following lawful bases to process general information:

- where we have your consent
- where our processing of your personal data is in the public interest
- where our processing of your personal data is necessary for our legitimate interests or those of a third party and are not overridden by your privacy rights

8. Who can access your personal information?

Origins of CJM takes the security of all personal data under our control very seriously. We will ensure that appropriate policy, training, technical and procedural measures are in place to ensure that data is stored securely, that we protect our electronic information systems from data loss and misuse, and only permit access to them when there is a legitimate reason to do so, and then under strict guidelines as to what use may be made of any personal data contained within them.

9. Who do we disclose personal data to?

This section of the privacy notice provides details of third parties with whom we may share the personal information contained in the Database.

Your personal data may be transferred to our third-party service providers who support the operation of our business. Where you have given us your clear, unambiguous consent to do so, we may pass your personal data to selected third parties to provide you with information about services we feel may interest you.

We sometimes need to share information with the individuals we process information about and our clients, for the purposes of fulfilling our contractual obligations. Where this is necessary, we are required to comply with all aspects of the legislation.

10. Your communication preferences

Your personal data is collected when you register with us or 'opt in' to receive marketing/promotional material; information and updates about our Models & Talent; and details of events. You can contact us at any time to amend your preferences or opt out of communications from us. You will also be sent the option to opt-out of future communications in every communication you receive from us. Please note that it may take up to a week for any changes to be processed.

11. How long we will keep your personal information?

The data protection legislative framework places an obligation on us to review the length of time for which we keep personal information. We are only able to keep your personal information for

as long as it is necessary for us to do so. The maximum period we will retain data is 10 years. We only intend to keep your information in an identifiable form in the Database while you remain happy to keep receiving communications from us, or where you continue to receive a service from us. In line with our Data Protection Policy in ensuring that personal data is kept for no longer than necessary, Origins of CJM reviews data on an annual basis and archives data that is no longer necessary.

12. What are your rights in relation to your personal data which is handled by us?

You have a number of rights in relation to the personal information held in the Database. If you wish to exercise any of the rights, please contact Origins of CJM by email.

Individuals have the following rights:

- (i) The right to be informed
- (ii) The right of access
- (iii) The right to rectification
- (iv) The right to erasure
- (v) The right to restriction of processing
- (vi) The right to object to processing
- (vii) The right to data portability
- (viii) The right to withdraw consent

(i) Right to be informed

You have the right to be informed about the collection and use of your personal data. Origins of CJM must provide you with information including purposes for processing your personal data, retention periods for that data, and who it will be shared with. This is called 'privacy information.'

(ii) Right of access

You can obtain a copy of your personal data held by the Origins of CJM.

You are also entitled to obtain confirmation as to whether or not data concerning you is being processed by Origins of CJM. Where that is the case, you are entitled to the following information subject to exemptions:

- The purposes of and legal basis for the processing *
- The categories of personal data concerned
- The recipients to whom the personal data has been disclosed
- The period for which it is envisaged that the personal data will be stored
- Communication of the personal data undergoing processing and of any available information as to its origin.

*Please note that 'processing' means an operation or set of operations performed on personal data such as collection, recording, organisation, structuring, storage, adaption, alteration,

erasure, restriction, retrieval. Proof of ID and any further information needed to locate the information may be required before Origins of CJM can comply with your request.

Any request for the above information should be in writing or by emailing :
originsofcjm@gmail.com

Origins of CJM will aim to respond within one month of receipt of the request.

(iii) Rectification of data

You can request Origins of CJM to rectify inaccurate personal data relating to you. If the data is inaccurate because it is incomplete, Origins of CJM must complete it if it is required to do so by you.

A request should be made by emailing Origins of CJM and a response will be sent within one month.

(iv) Erasure or restriction of personal data

You can request that Origins of CJM erase your data or restrict any processing of your data. You should be aware that if we erase your data, we will have no record of the fact that you have asked not to receive communications from us. It is therefore possible that you may start receiving communications from us at some point in the future if we obtain your details from a different source.

(v) The right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances. You can limit the way Origins of CJM uses your personal data if you are concerned about the accuracy of the data or how it is being used. If necessary, you can also stop us from deleting your data. Together, these opportunities are known as your 'right to restriction.'

(vi) The right to object to processing

You have the right to object to Origins of CJM processing of personal data, under certain conditions. This effectively means that you can stop or prevent us from using your data . However, it only applies in certain circumstances such as using personal data for direct marketing purposes or statistical purposes, and we may not need to stop if we can give strong and legitimate reasons to continue using your data.

(vii) The right to data portability

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us to another or give it to you. This is known as the right to data portability. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated.

You have the right to get your personal data from us in a way that is accessible and machine-readable, for example as a word document.

(viii) The Right to withdraw consent

Where our processing of your personal information is based on your consent, you have the right to withdraw it at any time. Please contact us if you want to do so.

13. How to contact Us

Any individual with concerns over the way Origins of CJM handles their personal data may contact us at :

E-mail us at : originsofcjm@gmail.com

If you feel that we have not addressed your concern in a satisfactory manner you may raise your concerns with the Information Commissioner. The Information Commissioner can be contacted at:

Telephone: 0303 123 1113

Livechat: <https://ico.org.uk/global/contact-us/live-chat/>

Website: <https://ico.org.uk/make-a-complaint/>

Changes to this privacy notice

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.