

# WEBSITE PRIVACY POLICY

## PBJ MANAGEMENT

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### **1. INTRODUCTION**

This privacy policy explains how we collect and use personal data about you when you interact with our websites, receive our newsletters or updates about our clients, or request further information from us. It also applies to personal data you may provide when you contact us by telephone, email or other means to request further information or liaise with us in circumstances where you are not a client of the agency. If you are a client of the agency you should refer to our client privacy policy.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy information we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data.

## **2. THE DATA CONTROLLER**

We are PBJ Management of 22 Rathbone Street, London, W1T 1LG.

PBJ Management is an exclusive UK based talent agency representing UK comedic, acting and presenting talent. Our group of agencies which are provided for in this privacy policy include:

- PBJ Management Limited
- Kaye BJ Management Limited (KBJ Management)
- KBJ and PBJ Management Corporate Division (COBJ)

For simplicity throughout this policy, 'we' and 'us' means the PBJ Management group and the above agencies.

When you interact with our websites, receive our newsletters or updates, or request further information from us, we are responsible for deciding how we hold and use this personal data about you which means we are a "data controller". We are required under the General Data Protection Regulation 2016 (the "GDPR") to notify you of the information contained in this privacy policy.

## **THIRD-PARTY LINKS**

Our websites include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

## **3. DATA PROTECTION OFFICER**

We have appointed a Data Protection Officer ("DPO") to oversee compliance with this Privacy Policy. If you have any questions about this privacy policy or how we handle your personal data, please contact the DPO by emailing: [privacy@pbjmanagement.co.uk](mailto:privacy@pbjmanagement.co.uk)

## **4. WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?**

Personal data is any information about an individual, from which that person can be identified. It does not therefore include data where the identity has been removed (anonymous data) or data about corporates.

We collect, store, and use the following categories of personal data about you which we have grouped together as follows:

<b>Personal Data</b>	<b>Includes</b>
<b>Identity</b>	Name, title, marital status, date of birth and gender
<b>Contact</b>	Address, email addresses and telephone numbers
<b>Communications</b>	Enquiries to our general enquiries email addresses, our email exchanges with you or records of telephone calls
<b>Bookings and payments</b>	Enquiries to book our clients, bank account and payment card details and invoicing details
<b>Updates about the agency and our clients</b>	Your preferences in receiving updates about the agency and our clients, our newsletters and your communication preferences
<b>Social media</b>	Your social media username, if you interact with us through those channels
<b>Prospective Clients</b>	Career history, projects worked on, samples of work and submissions (to include images, showreels and audio files)
<b>Prospective Employees</b>	Cover letters, CV and other information relating to your employment history
<b>Technical Data</b>	Browser type and version, time zone setting and location, browser plug-in types and versions, movements on our websites, operating system and platform and other technology on the devices you use to access our websites

We do not normally collect any sensitive personal data (known as special category personal data in the General Data Protection Regulation 2016) about you such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

Information you make available in email, post or telephone enquiries or other communications via our websites or social media webpages is your responsibility and you should think very carefully before including or sharing any sensitive personal data.

## **5. WHEN DO WE COLLECT YOUR PERSONAL DATA?**

- You contact us by telephone, email or post
- You interact with us on our social media pages such as sending us a message or providing feedback
- When you interact with our websites we may collect technical data about how you use our websites and what webpages you access

## 6. HOW WE USE YOUR PERSONAL DATA?

We are a talent agency representing UK comedic, acting and presenting talent with a wide network of contacts across the theatre, broadcasting, film, publishing, digital and commercials industry. We maintain a website for our clients, prospective clients and partners in the media sector to provide information about the agency and most importantly about our clients and their current projects. We also keep our partners in the media sector up to date about the agency and about our clients and their current projects by email and social media. To do this we sometimes need to use your personal data in a number of ways depending on your interactions with us and any enquiries you have sent us.

We will not process your personal data unless we have a legal basis to do so under data protection law and we will not process your personal data in a way you would not expect.

Below we set out what we do with your personal data and the legal basis on which we rely:

HOW WE USE YOUR PERSONAL DATA	LEGAL BASIS
We may use <b>Contact</b> , <b>Identity</b> and <b>Technical</b> personal data to administer and protect our business and our websites	Necessary for our legitimate interests  Necessary to comply with a legal obligation
When you send us an enquiry we keep a record of your <b>Communications</b> and may use your <b>Contact</b> and <b>Identity</b> data	It is in our legitimate business interests to respond to enquiries
When you book one of our clients and we process payment from you we may use <b>Booking</b> personal data	Necessary to fulfil our contractual obligations to you (even if you don't go ahead with the booking)
When we store and use your email address to send you updates about the agency and our clients we use your <b>Contact</b> , <b>Update</b> preferences and <b>Identity</b> personal data	It is in our legitimate business interests to keep our contacts and partners in the media sector up-to-date

<p>To send you invites to events hosted by the agency we use your <b>Contact</b>, <b>Update</b> preferences and <b>Identity</b> personal data</p>	<p>It is in our legitimate business interests to host events for our clients and partners in the media sector</p>
<p>To send you invites to gigs/performances/shows in which our clients are performing or are otherwise associated with we use your <b>Contact</b>, <b>Identity</b> and <b>Update</b> preferences personal data</p>	<p>It is in our legitimate business interests and in our client's legitimate interests to invite you to these gigs/performances/shows</p>
<p>To send you communications about updates to this privacy policy or any communications required by law, we may use your <b>Contact</b> and <b>Identity</b> personal data</p>	<p>To comply with our legal obligations</p>
<p>To store and consider any speculative job applications sent to the agency from <b>Prospective Employees</b></p>	<p>By sending us a job application you are asking us to consider you for a job at the agency. Therefore, our processing of this personal data is necessary in order to take steps at your request prior to entering into an employment contract (even if we don't offer you an interview or job)</p>
<p>We may store and consider any speculative enquiry and submission from <b>Prospective Clients</b> about becoming a client of the agency</p>	<p>Our processing of this personal data is necessary in order to take steps at your request prior to entering into an agency client agreement with you (even if we don't subsequently take you on as a client)</p>
<p>We may store your <b>Social Media</b> personal data to respond to your messages or feedback or otherwise interact with you on social media</p>	<p>To pursue the legitimate business interests of the agency and our clients</p>
<p>We use the data analytics collected by the use of cookies in your web browser (<b>Technical Data</b>) to improve the experience</p>	<p>To pursue our legitimate business interests of maintaining a website.</p>

of visitors to the website. Please see our <b><u>Cookie Use Policy</u></b> for further information.	
We use the data analytics collected by the use of cookies in your web browser ( <b>Technical Data</b> ) to analyse trends, administer our website and track your movements whilst on our website.	To pursue our legitimate business interests of improving our website content.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

If you engage with us as a client for the provision of our agency services, we will provide you with our client privacy policy.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **7. SHARING YOUR DATA**

We only share your personal data with your consent or where we are required to do so by law or as an essential part of maintaining our websites.

We sometimes share your personal data with trusted third parties such as third-party service providers. We have data processor contracts in place with such third parties which require them to respect the security of your data and to treat it in accordance with data protection legislation. Examples of such third-party service providers include our website platform provider and our IT Consultants.

We may, from time to time, expand, reduce or sell our business and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, subject to data protection law.

## **8. TRANSFERRING YOUR PERSONAL DATA OUTSIDE THE EEA**

We are based in the UK and will not transfer your personal data outside the EEA.

## **WEBSITE COOKIES**

Our websites are hosted by Linode whose servers are based outside the EEA.

We use Google Analytics whose servers are based outside the EEA to collect and analyse how individuals use our websites. We have switched on the IP Anonymization feature in Google Analytics which means they will anonymise your IP address as soon as it is technically feasible. The information provided to us by Google Analytics is aggregated in such a way that it is not possible to identify anyone.

We have appropriate data processor agreements in place with both Linode and Google Analytics.

## **9. HOW DO WE KEEP YOUR DATA SECURE?**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

While we will use all reasonable efforts to keep your personal data safe, you will know that the use of the internet is not entirely secure and, for this reason, we cannot guarantee the security or integrity of any personal data that is transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us.

## **10. WHAT SHOULD YOU DO IF YOUR PERSONAL DATA CHANGES?**

You should tell us, so we can update our records. The contact details for this purpose are in this privacy policy.

## **11. HOW LONG WILL YOU KEEP MY PERSONAL DATA?**

We retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of contacting you, sending you updates about the agency and our clients, and to use website data analytics.

Where we use the data analytics collected by the use of cookies in your web browser this personal data is aggregated in such a way that it is not possible to identify anyone. In which case we may use such information without further notice to you.

To comply with our legal obligations and to protect ourselves from any legal claims, we will retain any prospective job application sent to the agency for 12 months from receipt at which time it will be securely deleted. We will retain any submission you send for the purpose of being considered for representation for 6 years from receipt at which time it will be securely

deleted. After deletion, we may retain a record to confirm that you sent us a job application or requested to be considered by the agency for representation.

For operational purposes we may retain records of our communications with you including any concerns or complaints you have raised. We may also retain any email address or telephone numbers we have on record for you in our email systems or address books.

## **12. UPDATES WE MAY SEND YOU**

If you are on one of the mailing lists of our agents to receive updates about our clients' recent projects or any other update or newsletter, you can unsubscribe at any time by emailing that agent directly or by contacting the DPO.

## **13. YOUR RIGHTS**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.



In the limited circumstances where you may have provided your consent to the collection and processing of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the DPO.

If you do not provide certain information when requested, we may not be able to provide you with our services or comply with a request you have made.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### **14. Changes to this Privacy Policy**

We reserve the right to update this privacy policy at any time. We may also notify you in other ways from time to time about the processing of your personal data.

**If you have any questions about this Privacy Policy, please contact the DPO by email to: [privacy@pbjmanagement.co.uk](mailto:privacy@pbjmanagement.co.uk)**