

M&P Models Privacy Policy: Models

M&P Models is committed to protecting its Model's safety and privacy, and takes its responsibilities regarding the security of its Model's personal data very seriously. This privacy policy explains what personal data we collect about our Model, how and why we use it, who we disclose it to, and how we protect your privacy.

1. Who is responsible for your data

Our Privacy Policy applies to the personal data that M&P Models collects and uses.

References in this Privacy Policy to "M&P Models", "we", "us" or "our" mean M&P Models.COM Limited (a company registered in England and Wales with registration no 05345059 and registered office at Toad Hall Cattawade Street, Cattawade, Manningtree, England, CO11 1RG). We control the ways your personal data are collected and the purposes for which your personal data are used by M&P Models. M&P Models is the "data controller" for the purposes of the UK Data Protection Act 1998 (as amended or replaced), the General Data Protection Regulation (EU) 2016/679 (the "GDPR") and other applicable European data protection legislation (together the "Data Protection Legislation").

References to "Model" or "You" in this policy refer to any individual who has entered into a Mother Agency Agreement with M&P Models as Mother Agent or for whom we represent as Non-Mother Agent.

If you are under 18, please refer to our child-friendly Privacy Policy.

M&P Models reserves the right to make amendments to this policy from time to time. Any changes to this policy will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

2. Personal data we collect about you

When using the term "personal data" in our Privacy Policy, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. Your personal data may include for example your name, your contact details, nationality and date of birth.

3. Categories of data we collect

Please see the attached appendix for details of the categories of information that we may collect and process about you.

4. Special categories of data

In the course of providing services to you, we may collect information that could reveal your racial or ethnic origin, sexual orientation, political opinions physical or mental health, religious or philosophical beliefs, trade union membership or genetic or biometric data. Such information is considered "special categories of data" under the GDPR and other data protection laws. We only collect this information where you have given your explicit consent or one of the other exemptions apply (e.g. it is necessary to comply with our employment law obligations).

5. Disclosure of your personal information

We may disclose your personal data, in various ways and for various reasons, with the following categories of people:

- our clients and other foreign agencies to enable us to secure work for you;
- colleagues within M&P Models;
- any member of our group;

- tax, audit or other authorities, when we believe in good faith that the law or other regulation requires us to share this information;
- third party service providers who perform functions on our behalf (e.g. lawyers, auditors, accountants, technical support functions and IT consultants);
- a cloud-based storage provider;
- on call sheets when you participate in a job;
- travel agents and clients to book travel/visas for you; and
- a third party who acquires us or substantially all of our assets.

6. Transferring your information internationally

M&P Models is an international organisation and needs to transfer your information globally to be able to provide services to its clients and secure work for you. We want to make sure your information is stored and transferred in a way which is secure. We will therefore only transfer data outside for the European Economic Area (“**EEA**”) (i.e. the member states of the European Union, together with Norway, Ireland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:

- By way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by controllers in the EEA to controllers and processors in jurisdictions without adequate data protection laws;
- By signing up to the EU-US Privacy Shield Framework for the transfer of personal data from entities in the EU to entities in the USA or any equivalent agreement in respect of other jurisdictions; or
- Transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country’s levels of data protection via its legislation; or
- Where it is necessary for the conclusion or performance of a contract between you and us or the implementation of pre-contractual measures taken at your request; or
- Where you have consented to the proposed transfer, after having been informed of the possible risks of such transfers.

7. Retaining/Deleting your information

We only keep your information for as long as it is necessary to fulfil the purpose for which it was collected. Therefore once your contract with us expires or is terminated, we will delete most of your information within 6 months but will keep your contact details on our for 10 years (this is to enable us to contact you to pay you any buy-outs). Please note that in certain circumstances, we may hold your data for a longer period if we believe in good faith that the law or relevant regulators require us to preserve your data.

8. Security

We will use technical and organisational measures to safeguard your information, for example:

- Wan side firewall – Sophos UTM;
- Fileserver – Fully patched Linux server;
- Mailserver – Kerio Connect (Transitioning to O365) Mail archiving: Encrypted Mailstore archiving server;
- Sensitive documents (VDocs) Encrypted with AES256 at rest on the server and on the external backup drive; and documents are backed-up to the cloud (sync.com) with Zero Knowledge Encryption (AES256 used). See here: <https://www.sync.com/your-privacy/> for more information.

9. Your rights

You have the following rights in relation to your information:

- 9.1. Right to request a copy of your information.** You can request a copy of your information which we hold (this is known as a subject access request).

- 9.2. Right to correct any mistakes in your information.** You can require us to correct any mistakes in your information which we hold.
- 9.3. Right to request we stop processing your information.** In certain circumstances, you may request that we cease processing your information.
- 9.4. Right to request deletion of your information.** You can ask us to erase your information (also known as the “right to be forgotten”) in certain circumstances.
- 9.5. Right of data portability.** You have the right to transfer your personal data between data controllers in certain circumstances.

If you would like to request any of the above, please contact us at Russell@mandpmodels.com and/or mignon@mandpmodels.com to make any such requests. We will comply with the Data Protection Legislation in responding to any such requests.

10. Right to lodge a complaint

If you have any complaints about the way in which we collect, store and use your information, you can contact the supervisory authority in the United Kingdom, the Information Commissioner’s Office: <https://ico.org.uk/concerns/>

APPENDIX: CATEGORIES OF DATA WE COLLECT

What	Why	Basis of Processing
Name/Nickname	To be able to find Model on the system, communicate with, identify the Model and promote the Model	Processing is necessary for the performance of a contract with the data subject
Contact details (e.g. address, email address, mobile phone number)	To be able to communicate with the Model	Processing is necessary for the performance of a contract with the data subject
Gender	For booking purposes	Processing is necessary for the performance of a contract with the data subject
Date of birth	To know the age of the Model - legal requirements and booking purposes.	Processing is necessary for the performance of a contract with the data subject
Measurements (e.g. height, shoe size, chest (male), collar (male))	Booking purposes	Processing is necessary for the performance of a contract with the data subject
Description (e.g. eye colour, hair colour and length)	Booking purposes	Processing is necessary for the performance of a contract with the data subject
Details of tattoos and piercings	Booking purposes	Processing is necessary for the performance of a contract with the data subject
Willingness to do certain jobs e.g. lingerie, nude, topless, swimsuit	Booking purposes	Processing is necessary for the performance of a contract with the data subject
Other skills (e.g. acting, dancing and singing)	Booking purposes	Processing is necessary for the performance of a contract with the data subject
Pregnancy and details of pregnancy	To protect the health and safety of the model	Consent
Whether the Model is vegetarian	Booking purposes	Processing is necessary for the performance of a contract with the data subject
Whether the Model is willing to work with fur/cigarettes/alcohol	Booking purposes	Processing is necessary for the performance of a contract with the data subject
Financial details (e.g. bank details, NI number etc)	Finance/Billing purposes	Processing is necessary for the performance of a contract with the data subject
Travel details if required to travel (e.g. passport details, city visiting, visa)	Booking purposes	Processing is necessary for the performance of a contract with the data subject
Model pictures and videos	Booking purposes	Processing is necessary for the performance of a contract with the data subject
Account details (e.g. credit, advances, payments)	Financial records	Processing is necessary for the performance of a contract with the data subject/Necessary for compliance with a legal obligation
Model's social media account handle (e.g. Facebook, Instagram, Twitter)	Advising Model on promoting themselves and booking purposes (some clients require Model with a large social media following)	Legitimate interest – to assist our Models with promoting themselves and having a successful career