

## **The Goldilocks Agency Privacy Policy**

Goldilocks is committed to protecting the privacy of its users. This Privacy Policy sets out the type of personal information that we collect, what it is used for and the rights you have in relation to this information.

### **Definitions**

In this Privacy Policy:

"you" means the user of our Services,

"we/us/Goldilocks" means [The Goldilocks Agency], whose trading address and registered office is The Goldilocks Agency, 6 Montague Hall Place, Bushey, WD23 1QG "Services" means any of the services available from Goldilocks, and

"Site" means the site located at [goldilocksagency.co.uk](http://goldilocksagency.co.uk)

### **Acceptance of this policy and Goldilocks Terms**

By using Goldilocks's Services and/or this Site you accept the terms of this Privacy Policy and your related Terms. This Privacy Policy should be read in conjunction with our terms of use as they apply to you:

(If you are a Parent or Guardian of a young performer/ child you are a third party acting on behalf of your child and it is your responsibility to inform the child of its rights, and to act solely in the child's best interests. This Privacy Policy has been written in a way to be accessible to children, but if there is anything you or child does not understand, please contact the Data Protection Officer.

### **Goldilocks as your Data Controller**

Goldilocks has a Data Protection Officer who can be contacted via [info@goldilocksagency.co.uk](mailto:info@goldilocksagency.co.uk) or by writing to Data Protection Officer, 6 Montague Hall Place, Bushey, WD23 1QG

We regard the lawful and correct treatment of your personal information by us as very important to our business. To this end we fully endorse and adhere to data protection law across Europe in the form of the General Data Protection Regulation (GDPR) and the equivalent data protection law in the UK. As your Data Controller, Goldilocks can notify its activities to the Office of the Information Commissioner as required under the Data Protection Act 1998, and can be found in the Data Protection Public Register.

## Changes to this Privacy Policy

Goldilocks keeps this Privacy policy under regular review, and may change this policy occasionally by updating this page. Where practical we will notify you of changes to this Policy and prompt you to review these. However, you should check this page from time to time to ensure that you are happy with any changes. Your continued access and use of this site or other Goldilocks services will mean that you agree to our current Privacy Policy.

## How we make sure your data is used lawfully?

We will only collect, use, store, share (and any other of the defined uses of processing data) where there is a lawful basis as defined by data protection legislation, and do not collect more information than we need to fulfil the purpose. We document what lawful bases are relied upon for our processing activities. Lawful bases include where you have given consent, where processing is necessary for the performance of a contract with you, when complying with law and where there are legitimate interests. More information on how we use these lawful bases is provided below:

- **Consent** - In certain situations we can process your data with your consent. Where we process data based on consent, we will ask you for your explicit consent (you have to take an action) which you can withdraw at any time, but it will not affect the lawfulness of processing before then. For children under 16, consent will be gained from the parent or guardian.
- **Contract**- In certain situations, we need your personal information to comply with our contractual obligations. Where we rely on contract, we will ask you to agree to the use of your personal data necessary for entering into or the performance of your contract with us.
- **Complying with the law**- we may need to process your personal information if the law requires us to. For example, we may have to pass on information of people in fraud or other criminal activity to law enforcement,
- **Legitimate interest** - We will only rely on legitimate interests where the processing of your data is not overridden by your interests or rights and freedoms. This means that we may need your information and use in a way that can reasonably be expected as part of us running Goldilocks and does not materially impact your rights, freedoms or interests. For example, we may use your information to build a more accurate picture of you to better inform our business decisions.

## **When do we collect your personal information?**

We will collect personal information from you when you:

- Visit and/or use our Site and/or Services;
- Sign up to or use Site and/or Services;
- Become a registered member with us;
- Complete a survey or feedback form;
- Provide feedback or review our Site and/or Services;
- Correspond with us on social media;
- Contact us with a form of query, compliment or complaint (plus other types of enquiries) via phone, email or post;
- Use other features of our site.

## **What personal information do we collect?**

We will only ever ask you for the necessary information needed to process your data. We may process data including the following personal information about you, where supplied:

- Name;
- Gender;
- date of birth;
- address(es) or location data;
- email;
- telephone number(s);
- information pertaining to disability and ethnicity;
- physical details such as height;
- training and skills;
- information/ documents to enable us to vet an application;
- information/ documents you may provide to prove age, identity or other requirement where the law requires this to confirm discount eligibility;
- information gathered by the use of cookies;
- photographs, video and audio clips;
- career history;
- URLs and links to social media;
- bank and payment data;

**Please note, that as many of our Services are primarily promotional tools, personal data included in these public profiles may be accessible by other users and/or the public via wide circulation or redistribution, and via our historical archives.**

### **How we will use your personal information?**

We (or third party data processors acting on our behalf) may collect, store, use and share your personal information for the following purposes:

- to provide you with the Goldilocks Services, including making your public profile information available to other users of our Services;
- to keep your details and records up-to-date and accurate;
- to provide you with important service communications relating to Goldilocks products or Services;
- to answer your enquiries or otherwise communicate with you;
- internal record keeping;
- to notify you of other products and/or services that we think will be of interest to you
- to assist in the creation and editing of audio and visual content;
- to improve our products and services;
- to understand about information to better inform business decisions;
- to verify your identity;
- for market research and analysis, such as receiving opinions and feedback on our products and services;
- to process payments and identify or prevent fraudulent transactions;
- to develop, test and improve our sites, services and products that we provide to you;
- to comply with any legal obligation such as to share data with law enforcement;
- to customise our site to your interests; and
- to facilitate the historical archiving of all Goldilocks public profiles/titles both in print and digital formats.

### **What personal information do we share?**

We sometimes share personal information with carefully selected and trusted third parties. Wherever possible only information contained within your public profile would be released to such third parties. To keep your data safe and maintain your privacy we have the following approach:

- We implement appropriate legal, procedural and technical controls;
- We only provide the information they need to undertake that service;
- They can only use the information for that specific purpose;
- We maintain a close relationship to make sure that your data is protected and your privacy maintained;

- We mandate that if or when the service stops, they must return or delete any information held.

Here are the examples of the types of trusted third parties we work with:

- Goldilocks network partners, circulating breakdown information via their casting platforms in other territories,
- subcontractors assisting us in providing our service to our users,
- IT companies who help us deliver our sites and services;
- third parties who provide service enhancements or additional functionality to our users related to how they use our services. More information: In order to facilitate certain users of Goldilocks with their workflow management processes or other functionality, Goldilocks may from time to time provide or authorise the use of certain third party software or applications to facilitate additional off-site access to the professional materials and content otherwise available via the Services. An example of this would be third party tools used by Casting Directors to administer their client submissions to casting services. Such third party packages or systems should only be used subject to the written approval of Goldilocks. You acknowledge that your personal information may be used in this way. Please note however that Goldilocks does not endorse and is therefore not responsible for any such third party packages or systems, and Goldilocks will not be liable for any loss of information, materials, data or otherwise that may occur due to the use of your information within them.
- third parties who are involved in furthering research and technology in areas connected with our service. More information: We are constantly looking for new ways to change and upgrade our Services and functionality. This may involve partnering with selected and trusted research organisations and technology providers to contribute to their research and innovation projects. Often the most innovative developments come from other industries or fields of research outside of our own, and the outputs of the research may have a broader application beyond the improvements from which we directly benefit. As part of this research our trusted partners may be given access to our systems and data and/or be provided with copies of our data, including member photos, video and audio clips, and other professional information from their public profile. In all such circumstances our partners' access to and use of this information will be comprehensively documented and strictly limited to specific research projects that may include benefits for Goldilocks and our Services to you, and will be under secure, confidential, temporary conditions, and closed testing environments. Under no circumstances will this information be used for any commercial or live operational activity, other than to develop and test the specific technology and functionality, without your prior consent.
- law enforcement in complying with the law, or to enforce our Terms and Conditions or to protect the rights, property, or safety of ourselves, our customers or other third parties,
- if we acquire any new business, and/or sell all or part of our business, and
- third party payment service providers.

### **How long do we keep your information?**

We will not keep personal information for longer than it is necessary, and will only retain information for as long as needed to carry out our functions and that purpose. Personal information is retained in line with our retention schedule.

### **Where your information may be processed**

The information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA) in certain circumstances. For example, if we contract with service providers based outside the EEA, or if any of our servers are at any time based outside the EEA (including 'cloud' service provision). If it is, then we put in place controls to make sure that your information has the same level of protection as if it was inside the EEA. Where we would have to disclose your personal information to third parties, in any circumstances, we will always take all appropriate steps to ensure that such third parties are responsible and trusted and that your personal information will be treated in accordance with this Privacy Policy, and to European and UK Data Protection standards or equivalent.

### **Payment security**

We will retain payment details only to make payments to you.

### **Links to other websites**

Our site may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites such as social media websites and such sites are not governed by this Privacy Policy. You should exercise caution and look at the privacy policy applicable to the website in question.

### **Keeping your personal information up to date**

Goldilocks provides you with access to your personal information and tools to manage this. If you have provided us with personal information, it is your responsibility to ensure that it is correct and up to date. This will enable us to provide you with the best service possible. Please contact us as soon as possible if you believe that any information we are holding on you is incorrect or incomplete.

## Your rights

You have a number of rights to your information that can be accessed by contacting the Data Protection Officer at [info@goldilocksagency.co.uk](mailto:info@goldilocksagency.co.uk) or by writing to The Goldilocks Agency, 6 Montague Hall Place, Bushey WD23 1QG

To make sure we protect you and your information, we will need to verify your identity for any requests we receive from you before we begin to process your request.

## Children

As a parent or guardian representing a child, you are a third party acting on behalf of your child and it is your responsibility to inform the child of its rights, and to act solely in the child's best interests. Parents or guardians have the right to exercise the below rights on behalf of the child that they represent.

## Third Party

If this is a third party acting on your behalf, we will request that they provide proof that they have your consent to represent you.

If we decide not to action your request we will explain our justification for refusal.

- Access your information - you can request access to or a copy of your personal information and check what information we hold about you.
- Change or correct your information - if you wish to have any errors corrected, you can request this - although this is not an absolute right and we may request for further information.
- Take your information - you can ask for a copy of your personal information to be provided in a reusable and machine-readable form.
- Object to, limit or restrict the use of your information - you can ask that we stop using parts or all of your personal information or limit its use if you believe that this personal information is unlawfully held.
- Direct marketing - you can ask that we stop using your personal information for direct marketing.
- Delete your information - you can ask that your personal information is deleted if you believe it is no longer necessary for the purposes it was collected.
- Legitimate interest - if we are processing your information on the grounds of legitimate interest, you can ask us to stop this if there are reasons related to your individual circumstances. We have to do this unless we believe we still have an overriding legitimate reason.

### **If you are unhappy**

The theme throughout this Policy is that Goldilocks treats your privacy with the utmost importance and we strive to meet the highest standards when collecting and using personal information. If for whatever reason you believe that our collection or use of your information is unfair or inappropriate, we encourage you to report this to our Data Protection Officer. We will take any complaints we receive about your privacy very seriously,

You also have the right to complain to your supervisory authority if you are unhappy with how your personal information has been collected, used or managed which within the UK is the Information Commissioner's Office (ICO) who can be contacted by calling 0303 123 1113 or by visiting [www.ico.org.uk](http://www.ico.org.uk).

### **Cookies policy**

**What is a cookie:** A cookie is a piece of information that is stored on your computer's hard drive by your web browser. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

**Managing cookies:** Most web browsers allow control over these cookies through the browser settings.

**Why do we use cookies:** Goldilocks uses cookies to track and analyse visits to our site and the use of video and audio material, with the aim of constantly improving our site services and ensuring that we are adequately supporting the growing number of visitors to our site. These may include third party cookies set by Google Analytics, Twitter.

**Third party cookies:** Cookies from third parties may also be used by Goldilocks to help us understand how our visitors engage with the website and to determine, for instance, the number of people who click on an advertisement and subsequently buy our services. To gather this information, Goldilocks uses Google Analytics, Google AdWords and Hotjar. For more information on how Google uses cookies for analytics and conversion tracking visit <https://www.google.com/policies/technologies/cookies/> and for Hotjar <https://www.hotjar.com/privacy>.

### **More information and information in an accessible formats**

This Privacy Policy has been carefully written to try to provide clarity and understanding and to make sure the information contained within it to be accessible for you. If there is information you do not understand, or if you require additional explanation, please contact the Data Protection Officer using the contact details within this Policy and we will be happy to assist you.





**The Goldilocks Agency**  
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## Queries

If you have any queries about the way your data is used by Goldilocks, please contact:

Data Protection Officer  
The Goldilocks Agency  
6 Montague Hall Place  
Bushey WD23 1QG  
[info@goldilocksagency.co.uk](mailto:info@goldilocksagency.co.uk)