



ST MANAGEMENT LTD
Talent Agency

Privacy Policy

20th January 2020



1 INTRODUCTION

- 1.1 This privacy policy (Privacy Policy) sets out how we, ST Management Ltd (we, us, our), collect and use your personal data (your personal information) in connection with our business. It also explains what rights you have to access or change your personal data.
- 1.2 In this Privacy Notice:
- 1.3 "Talent" means a model represented by us; and
- 1.4 "Client" means clients who book Talent through us or enquire about a potential booking.

2 ABOUT US

- 2.1 We are a company registered in England under company number 12392183, with our registered address as set out below.
- 2.2 You can contact us as follows - Address: ST Management Ltd, Kemp House, 160 City Road, London EC1V 2NX, United Kingdom. E-mail: sharon@sharon-thomas.co.uk

3 INFORMATION WE MAY COLLECT ABOUT YOU

- 3.1 Information that you provide to us.
 - 3.1.1 We will collect any information that you provide to us when you:
 - 3.1.1.1 Input forms on the website, including the Talent Application Form;
 - 3.1.1.2 Place a booking in person, over the phone or by e-mail;
 - 3.1.1.3 Make an enquiry, provide feedback or make a complaint by the phone, by e-mail or on our website;
 - 3.1.1.4 Submit correspondence to us by post, e-mail or via our website;
 - 3.1.1.5 Register for or attend our events;
 - 3.1.1.6 Submit a CV or application to a job vacancy;
 - 3.1.1.7 Attend an interview or assessment;
 - 3.1.1.8 'Follow', 'Like', post to or interact with our social media accounts, including Instagram, Twitter, Facebook and Snapchat;
 - 3.1.1.9 Interact in any other way with us as Talent or potential Talent;
 - 3.1.1.10 Interact in any other way with us as a Client or potential Client.
 - 3.1.2 The information you provide to us will include (depending on the circumstances):
 - 3.1.2.1 Identity and contact data: title, names, addresses, e-mail addresses, phone numbers and gender;
 - 3.1.2.2 Talent application data: if you are submitting a Talent Application Form, we will request your date of birth, height and shoe size. We will also request a link to your Instagram account, general information about your interests and photographs, including a headshot, profile and full length.



- 3.1.2.3 Portfolio profile data: if you are a Talent or potential Talent whom we represent, we will collect personal information including your hair and eye colour, height and measurements for busts, waist and hips, shoe size, your portfolio photographs and a link to your Instagram account. We may also collect and process Sensitive Personal Data about the following (please see paragraph 3.3. below or more information):
 - 3.1.2.4 Financial data: if you are booking Talent or otherwise purchasing our services, you will also provide payment details, which may include billing addresses, credit/debit card details and bank account details. We will request payment details if you are Talent which we represent;
 - 3.1.2.5 Employment and background data: if you are submitting a job application, you may also provide additional information about your academic and work history, qualifications, skills, projects and research that you are involved in, references, proof of your entitlement to work in the UK, your national security number, your passport or other identity document details, your current level of remuneration (including benefits), and any other such similar information that you may provide to us;
 - 3.1.2.6 Survey data: from time to time we might ask if you would be willing to participate in our surveys; if you agree, we will also collect any information that you provide as part of that survey;
 - 3.1.2.7 Sensitive Personal Information: if you are:
 - 3.1.2.7.1 Submitting a job application, you may provide information about your race or ethnicity, religious beliefs, sexual orientation, health and whether you have any disability; and
 - 3.1.2.7.2 A Talent we represent, you may provide information which is Sensitive Personal Information such as your dietary requirements, health, and whether you have a disability.
- 3.2 Information we collect about you:
- 3.2.1 Information contained in correspondence: we will collect any information contained in any correspondence between us. For example, if you contact us by e-mail or telephone, we may keep a record of that correspondence;
 - 3.2.2 Transactional data: we will collect information related to your transactions with us, including the date and time, the amounts charged and other related transaction details;



3.2.3 Website usage and technical data: we will also collect certain information about how you use our website and the device you use to access our website. This information might include your geographical location, device information (such as your hardware model, mobile network information, unique device identifiers), the data transmitted by your browser (such as your IP address, date and type of the request, content of the request regarding the specific site, time zone settings, access status/HTTP status code, volume of data transmitted, browser type and version, language settings, time zone settings, length of visit to the website, date and time of the request, operating system and interface) number of page views on the website and similar information. This information may be collected by a third-party website analytics service provider on our behalf and may be collected using cookies or similar technologies. For more information on cookies, please read the COOKIES section below;

3.3 Sensitive Personal Information

3.3.1 "Special categories" of particularly Sensitive Personal Information require higher levels of protection. Sensitive Personal Information includes any 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. Higher levels of protection are required to process information about criminal convictions and offences.

3.3.2 We need to have further justification for collecting, storing and using this type of Sensitive Personal Information and implement appropriate policies and safeguards. We process Sensitive Personal Information in the following circumstances:

- 3.3.2.1 In limited circumstances, with your explicit written consent;
- 3.3.2.2 Where we need to carry out our legal obligations;
- 3.3.2.3 For reasons of substantial public interest, such as for equal opportunities monitoring;
- 3.3.2.4 For legal claims; or
- 3.3.2.5 Where you have already made the information public.

3.3.3 If you are a job applicant, we will collect Sensitive Personal Information about:

- 3.3.3.1 Your race, ethnicity, religious or philosophical beliefs and sexual orientation for our diversity and equal opportunities records (for reasons of substantial public interest, for equal opportunities monitoring); and
- 3.3.3.2 Your health and any disability you may have as necessary for arranging your interview (based on compliance with our legal obligations to make reasonable adjustments to facilitate your application),



3.3.4 If you are Talent which we represent, we will ask for your explicit consent to collect and use Sensitive Personal Information about your health, including dietary requirements and medical information or any disability you may have. There will be very limited reasons why we might use such information without your explicit consent, for example, in a medical emergency to inform medical professionals.

3.4 Information we receive from third parties

3.4.1 In certain circumstances, we will receive information about you from third parties. For example:

3.4.1.1 Employers, recruitment agencies and referees: if you are a job applicant, we may contact your recruiter, current and former employers and referees based inside or outside the EU, to provide information about you and your application;

3.4.1.2 Clients: our Clients who may provide feedback about you after a booking;

3.4.1.3 Service providers: we may collect personal information from our website developer, IT support provider, software and hosting providers, payment services provider, marketing services providers, and professional advisers (based inside or outside the EU);

3.4.1.4 Website security: we will collect information from our website security service partners inside the EU, about any misuse to the website, for instance, the introduction of viruses, Trojans, worms, logic bombs, website attacks or any other material or action that is malicious or harmful;

3.4.1.5 Social media plug-ins: we currently use social media plug-ins from the following service providers who are based both inside and outside the EU: Instagram and Facebook. By providing your social media account details, you are authorising that third-party provider to share with us certain information about you; and

3.4.1.6 Publicly available sources: we currently use publicly available sources to identify potential Talent.

3.4.2 We might also receive information about you from third parties if you have indicated to such a third party that you would like to hear from us.



4 HOW WE USE INFORMATION ABOUT YOU AND RECIPIENTS OF YOUR INFORMATION

4.1 We will use your information for the purposes listed below, either based on:

4.1.1 Performance of your contract with us and the provision of our services to you;

4.1.2 Your consent (where we request it);

4.1.3 Where we need to comply with a legal or regulatory obligation; or

4.1.4 Our legitimate interests or those of a third party (see paragraph 4.3 below).

4.2 We use your information for the following purposes:

4.2.1 To provide access to our website: to provide you with access to our website in a manner convenient and optimal and with personalised content relevant to you including sharing your information with our website hosts and developers;

4.2.2 To publish your portfolio on the website: when agree to be represented by us, we will use the details proved in your Talent Application Form and other personal information provided to us such as your portfolio images to prepare a portfolio profile page (based on performing our contract with you and on our legitimate interest to promote our website and services as a talent agency);

4.2.3 To make and facilitate bookings: we will use your information to facilitate bookings of Talent we represent (based on performing our contract with you if you are Talent we represent or based on our legitimate interests to supply our services as a talent agent if you are a Client seeking to book a Talent);

4.2.4 To process and facilitate transactions with us: we will use your information to process transactions and payments and to collect and recover money owed to us (based on performing our contract with you and based on our legitimate interest to recover debts due);

4.2.5 To share information about our Talent with other international Talent agencies: where you give us your permission to do so, we will share your personal information with other talent agencies for actual or prospective bookings;

4.2.6 To respond to fans' requests: if you are a fan and you contact us we will use your personal contact details to send you a postcard from STM (based on our legitimate interest to promote our brand and communicate with interested individuals);

4.2.7 Relationship management: To manage our relationship with you, which will include notifying you about changes to our terms of use or privacy notice, and asking you to leave a review or take a survey (based on performing our contract with you, to comply with our legal obligations and based on our legitimate interests to keep our records updated and study how our website and services are used);



- 4.2.8 User and customer support: to provide customer service and support (on the basis of our contract with you or on the basis of our legitimate interests to provide you with customer service), deal with enquiries or complaints about the website and share your information with our website developer, IT support provider, software and hosting providers, payment services provider, marketing provider and professional advisers as necessary to provide customer support (on the basis of our legitimate interest in providing the correct services to our website users and to comply with our legal obligations);
- 4.2.9 Prize draws, competitions and surveys: to enable you to take part in prize draws, competitions and surveys (on the basis of performing our contract with you and our legitimate interest in studying how our website and services are used, to develop them and grow our business);
- 4.2.10 Recruitment: to process any job applications you submit to us, whether directly or via an agent or recruiter including sharing this with our third party recruitment agency (on the basis of our legitimate interest to recruit new employees or contractors) and we will process any Sensitive Personal Information you supply to us to ensure we meet our legal obligations to facilitate access and equal opportunities to job applicants;
- 4.2.11 Health and safety: to process Sensitive Personal Information so that we can protect your health and safety when arranging a booking for you (based on either your explicit consent for us to collect and use this information or in circumstances where the processing is necessary to protect your vital interests at a time where you are not capable of giving your consent, such as to inform medical professionals in a medical emergency);
- 4.2.12 Marketing: to keep in contact with you about our news, events and services that we believe may interest you, provided that we have the requisite permission to do so, and sharing your information with a marketing services provider (either based on your consent where we have requested it or our legitimate interests to provide you with marketing communications where we may lawfully do so);
- 4.2.13 Advertising: to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you (on the basis of our legitimate interests in studying how our website/services are used, to develop them, to grow our business and to inform our marketing strategy);
- 4.2.14 Social media interactions: to interact with users on social media platforms including Instagram, Twitter, Snapchat and Facebook, for example, responding to comments and messages, posting, 'retweeting' and 'liking' posts (based on our legitimate interest in promoting our brand and communicating with interested individuals);
- 4.2.15 Analytics: to use data analytics to improve our website, products, services, marketing, customer relationships and experiences (based on our legitimate interests in defining types of customers for our website and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy);



- 4.2.16 Suggestions and recommendations: to share your information with selected third parties such as suppliers and partners, to enable them to contact you with information about things that may interest you (where we have your consent to do so);
 - 4.2.17 Research: to carry out aggregated and anonymised research about general engagement with our website (based on our legitimate interest in providing the right kinds of products and services to our website users);
 - 4.2.18 Fraud and unlawful activity detection: to protect, investigate, and deter against fraudulent, unauthorised, or illegal activity, including identity fraud (based on our legitimate interests to operate a safe and lawful business or where we have a legal obligation to do so); and
 - 4.2.19 Compliance with policies, procedures and laws: to enable us to comply with our policies and procedures and enforce our legal rights, or to protect the rights, property or safety of our employees and share your information with our technical and legal advisors (based on our legitimate interests to operate a safe and lawful business or where we have a legal obligation to do so).
- 4.3 As outlined above, in certain circumstances, we may use your personal information to pursue legitimate interests of our own or those of third parties. Where we refer to using your information based on our "legitimate interests", we mean our legitimate business interests in conducting and managing our business and our relationship with you, including the legitimate interest we have in:
- 4.3.1 Personalising, enhancing, modifying or otherwise improving the services and communications that we provide to you;
 - 4.3.2 Promoting our website and services as a talent agency;
 - 4.3.3 Detecting and preventing fraud and operating a safe and lawful business; and
 - 4.3.4 Improving security and optimisation of our network, sites and services.
- 4.4 Where we use your information for our legitimate interests, we make sure that we consider any potential impact that such use may have on you. Our legitimate interests don't automatically override yours, and we will not use your information if we believe your interests should override ours unless we have other grounds to do so (such as your consent or a legal obligation). If you have any concerns about our processing, please refer to details of "Your Rights" section below.



5 WHO WE MIGHT SHARE YOUR INFORMATION WITH

- 5.1 In connection with the purposes and on the lawful grounds described above and in addition to the recipients of your information as described above, we will share your personal information when relevant with third parties such as:
 - 5.1.1 Clients (for actual and potential bookings): our Clients who make an actual booking or who enquire about a potential booking. Please note some of our Clients may operate outside of the EEA;
 - 5.1.2 Partners and collaborators: other talent agencies worldwide where we have agreed we can do so to instigate actual or potential bookings;
 - 5.1.3 Our service providers: service providers we work with to deliver our business, who are acting as processors and provide us with:
 - 5.1.3.1 Website development and hosting services which may operate inside or outside of the EEA
 - 5.1.3.2 IT, system administration and security services which may operate inside or outside of the EEA;
 - 5.1.3.3 Marketing and advertising services (including the Google AdWords service), analytics providers (including Google Analytics) based outside of the EEA;
 - 5.1.3.4 Maps services (including Google Maps API), based outside of the EEA;
 - 5.1.3.5 Social media plug-in services including Facebook, Twitter, Snapchat, Instagram based outside of the EEA;
 - 5.1.3.6 Payment services which may operate inside or outside of the EEA;
 - 5.1.3.7 Identity verification, fraud prevention and detection services which may operate inside or outside of the EEA;
 - 5.1.3.8 Banking services based inside or outside of the EEA;
 - 5.1.3.9 Legal, accountancy, auditing and insurance services and other professional advisers based in the United Kingdom;
 - 5.1.3.10 Recruitment service providers based in the United Kingdom.
 - 5.1.4 Regulators and governmental bodies: HM Revenue & Customs, regulators, governmental bodies and other authorities acting as processors or joint controllers based in the United Kingdom, who require reporting of processing activities in certain circumstances;
 - 5.1.5 Marketing parties: any selected third party that you consent to our sharing your information with for marketing purposes;
 - 5.1.6 Prospective sellers and buyers of our business: any prospective seller or buyer of such business or assets, only if we decide to sell or buy any business or assets; and



5.1.7 Other third parties (including professional advisers): any other third parties (including legal or other advisors, regulatory authorities, courts, law enforcement agencies and government agencies) based in the United Kingdom and any other specific countries where our business has advisers or carries out reporting here necessary to enable us to enforce our legal rights or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law.

5.2 We require third parties to maintain appropriate security to protect your information from unauthorised access or processing.

6 COOKIES

6.1 We use cookies to ensure that you get the most out of our website. Cookies are small amounts of information in the form of text files which we store on the device you use to access our website. Cookies allow us to monitor your use of the software and simplify your use of the website. For example, a temporary cookie to keep track of your "session".

6.2 If you do not want cookies on your device, you can change the settings on your browser or device to reject cookies. For more information about how to reject cookies using your internet browser settings, please consult the "Help" section of your internet browser (or visit <http://www.aboutcookies.org>). Please note that, if you do set your Internet browser to reject cookies, you may not be able to access all the functions of the website.

6.3 Our website may contain content and links to other sites that are operated by third parties that may also operate cookies. We don't control these third-party sites or cookies, and this Privacy Policy does not apply to them. Please consult the terms and conditions and Privacy Policy of the relevant third-party site to find out how that site collects and uses your information and to establish whether and for what purpose they use cookies.

7 HOW WE LOOK AFTER YOUR INFORMATION AND HOW LONG WE KEEP IT FOR

7.1 We operate a policy of "privacy by design" by looking for opportunities to minimise the amount of personal information we hold about you. We use appropriate technological and operational security measures to protect your information against any unauthorised access or unlawful use, such as:

7.1.1 Ensuring the physical security of our offices or other sites;

7.1.2 Ensuring the physical and digital security of our equipment and devices by using appropriate password protection and encryption;

7.1.3 Maintaining a data protection policy for, and delivering data protection training to, our employees; and

7.1.4 Limiting access to your personal information to those employed our company



- 7.2 We will retain your information for as long as is necessary to provide you with the services that you have requested from us or for as long as we reasonably require to retain the information for our lawful business purposes, such as to exercise our legal rights or where we are permitted to do. We operate a data retention policy and look to find ways to reduce the amount of information we hold about you and the length of time that we need to keep it. For example,
- 7.2.1 We archive our e-mail and paper correspondence regularly and destroy information older than seven years;
 - 7.2.2 We retain information relating to orders, refunds and website user queries for approximately seven years;
 - 7.2.3 We maintain a suppression list of e-mail addresses of individuals who no longer wish to be contacted by us. So that we can comply with their wishes, we must store this information permanently.

8 HELP KEEP YOUR INFORMATION SAFE

- 8.1 You can also play a part in keeping your information safe by:
- 8.1.1 Keeping your devices protected by using the latest version of your operating system and maintaining any necessary anti-virus software, and
 - 8.1.2 Being vigilant to any fraudulent e-mails that may appear to be from us. Any e-mails that we send will come from an e-mail address ending in '@sharon-thomas.co.uk'.

9 INTERNATIONAL TRANSFERS OF YOUR INFORMATION

- 9.1 Our company is in the UK.
- 9.2 Some of our external third parties are outside the European Economic Area (EEA), so their processing of your personal data will involve a transfer of data outside the EEA.
- 9.3 Some of our Clients may be outside of the EEA. If we share data with such Clients who are outside of the EEA and not based in a country which will provide an adequate level of protection for personal data by the European Commission (see 9.4(1)), then we will seek our Talent's consent to transfer their Personal Data to the relevant Client.
- 9.4 Whenever we transfer your personal data to anyone else outside of the EEA, we ensure a similar degree of protection by ensuring at least one of the following transfer solutions are implemented:
- 9.4.1 We will only transfer your personal data to countries that provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries;
 - 9.4.2 Where we use certain service providers, we may use specific contracts approved by the European Commission, which give personal data the same protection it has in Europe; and



- 9.4.3 Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield.
- 9.5 Please contact us using the contact details at the top of this Privacy Policy if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

10 YOUR RIGHTS TO THE INFORMATION WE HOLD ABOUT YOU

10.1 You have certain rights in respect of the information that we hold about you, including:

- 10.1.1 The right to be informed of how we use your information, as we seek to do in this Privacy Notice;
- 10.1.2 The right to ask us not to process your personal data for marketing purposes;
- 10.1.3 The right to request access to the information that we hold about you;
- 10.1.4 The right to request that we correct or rectify any information that we hold about you which is out of date or incorrect;
- 10.1.5 In certain circumstances, the right to ask us to stop processing information about you; and
- 10.1.6 The right to complain about us to the UK Information Commissioner's Office or with the relevant authority in your country of work or residence;
- 10.1.7 The right to withdraw your consent for our use of your information in reliance of your consent (refer to paragraph 4 to see when we are relying on your consent), which you can do by contacting us using any of the details at the top of this Privacy Notice;
- 10.1.8 The right to object to our using your information based on our legitimate interests (refer to paragraph 4 above to see when we are relying on our legitimate interests) (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;
- 10.1.9 The right to receive a copy of any information we hold about you (or request that we transfer this to another service provider) in a structured, commonly used, machine-readable format, in certain circumstances; and
- 10.1.10 The right to ask us to limit or cease processing or erase information we hold about you in certain circumstances.

10.2 How to exercise your rights

10.3 You may exercise your rights above by contacting us using the details at the top of this Privacy Policy, and we will comply with your requests unless we have a lawful reason not to do so, or in the case of preventing processing for marketing activities also by checking certain boxes on forms that we use to collect your data (such as the Talent Application Form) to tell us that you don't want to be involved in marketing.



- 10.4 Please note that we may need to retain certain information for our record-keeping and research purposes. We may also need to send you service-related communications relating to your website user account even when you have requested not to receive marketing communications.
- 10.5 What we need from you to process your requests
- 10.6 We may need to request specific information from you to help us confirm your identity and to enable you to access your personal data (or to exercise any of your other rights). This security measure ensures that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information concerning your request to speed up our response.
- 10.7 You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

11 PRIVACY OF CHILDREN

- 11.1 This website is not aimed at or designed for children, and we do not intend to (and will not knowingly) collect any personal information from children below the age of 18 without parental consent.
- 11.2 If you are under 18, you must ask your parent or guardian for their permission before sending any information to us or asking us to e-mail you. By sending us any information to us, or asking us to e-mail you, you are confirming that your parent or guardian has consented to you doing so. We may be required to confirm this with your parent or guardian accordingly.
- 11.3 We encourage parents to review the e-mail and internet activities of their children to ensure that this website is used following this Privacy Policy and with their consent. Should parents wish to access any of their children's personal information which is held by us, they should follow the steps outlined in paragraph 10.



12 SHARING DATA DIRECTLY WITH THIRD PARTIES

- 12.1 You might end up providing personal information directly to third parties as a consequence of your interactions with our website and other services offered by us. For example, you may share personal information about directly with our Clients once you attend a booking, or you may attend an event hosted by us where you communicate personal information directly with other attendees. We are not responsible for how such third parties use personal information provided by you.
- 12.2 We recommend that you read Clients' privacy notices before you attend a booking to ensure you understand how they will use your personal information and your rights concerning personal information which they process.
- 12.3 Please be responsible with personal information of others when using our website and services. We are not responsible for your misuse of personal information, or the direct relationship between you and others when it takes place outside of the website or our services.

13 THIRD-PARTY LINKS

- 13.1 The website may 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. When you leave our website, we encourage you to read the privacy policy of every website you visit.

14 CHANGES TO THIS PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

- 14.1 We may make changes to this Privacy Policy from time to time. We will post any changes to our site or notify you of any material changes by e-mail.
- 14.2 The personal information we hold about you must be accurate and current. Please keep us informed if your personal information changes during your relationship with us by contacting us via the contact details at the top of this Privacy Notice.

This Privacy Policy was produced on 20th January 2020.