PRIVACY POLICY – SUPA MODEL MANAGEMENT LTD.

1. Introduction

We are <u>SUPA Model Management LTD</u> ("we" or "us"), a company registered in England and Wales.

Our company registration number is 08310249. REGISTERED ADDRESS IS

The Old Casino 28 Fourth Avenue Hove East Sussex BN3 2PJ

We are committed to protecting your personal data. This privacy policy gives you detailed information on when and why we collect your personal data, how we use it and how we keep it secure. Please read this policy carefully alongside any applicable Terms & Conditions to understand our views and practices regarding your personal data and how we will treat it. More information can be provided on request. Definitions are defined in the Appendix at the end of this privacy policy.

Responsibilities

For the purpose of the applicable Data Protection Legislation, we are the data controller of any personal data we process. As a data controller, we are responsible for ensuring our systems, processes, suppliers and People comply with Data Protection Legislation in relation to the personal data we handle.

We require our People to comply with this privacy policy Data Protection Policy when dealing with personal data.

We take Personal Data Breaches very seriously, and are required to notify the Information Commissioner's Office in the event of such a breach.

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

We have policies, procedures and records to demonstrate compliance with the principles, as further detailed in our Data Protection Policy.

How we collect, use and disclose your personal data

Generally, we collect your personal data when you interact with us (for example, when entering into a relationship with us as Talent, a Client or one of our People). However, from time to time we also need to collect personal data from other third parties in connection with our relationship with you. The following table I is a summary of how we collect, use and disclose your personal data:

Transfer of Data between Jurisdictions and UK Authorities.

Personal data may be transferred to one of our Affiliate Talent Agencies for the purposes of fulfilling our obligations to our Talent and Clients. Or to UK Authorities where appropriate to fulfill our legal obligations. We also use a number of suppliers in connection with the operation of our business and they may have access to the personal data we process. The following are of example only and are not an exhaustive list: - a IT supplier/Accountant/legal who may see our personal data when providing software support, or a company which we use for a marketing campaign may process contacts'

personal data for us. When contracting with suppliers and/or transferring personal data to a different jurisdiction, we take appropriate steps to ensure that the principles are adhered to.

Your rights

Personal data must be processed in line with an individual's rights, including the right to:

- request a copy of their personal data;
- request that their inaccurate personal data is corrected;
- request that their personal data is deleted and destroyed when causing damage or distress; and
- opt out of receiving electronic communications from us.

Should you wish to make a request in line with your rights as an individual, please forward it to us using the contact details provided at the end of this privacy policy.

Our People must notify or inform Charlie Clark immediately if they receive a request in relation to personal data which the firm processes.

The Data Protection Legislation gives you the right to access information held about you. Your right of access can be exercised in accordance with the Data Protection Legislation (as applicable).

Changes to our privacy policy

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.

Supa does not use data for profiling or automated decision making.

Contacts and complaints

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to us

at accounts@supamodelmanagement.com

You should direct all complaints relating to how the firm has processed your personal data to CHARLES CLARK. <u>Charlie@supamodelmanagaement.com</u> accounts@supamodelmanagement.com

Our People/Staff must inform CHARLES CLARK immediately if they receive a complaint relating to how we have processed personal data so our complaints procedure can be followed.

Date updated: May 2018.

Appendix

Our People: all people providing services to or working for us, including but not limited to our employees, directors, members, and contractors.

Personal data: information (including opinions) which relates to an individual and from which he or she can be identified either directly or indirectly through other data which we have or are likely to have in our possession. These individuals are sometimes referred to as data subjects.

Personal Data Breach: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed by an organisation

1. Your rights as an individual

It is important that you understand what your rights are as an individual.

2. Right to Erasure

You may request that SUPA MODEL MANAGEMENT LTD erases your personal data and we will do so.

3. Right to request rectification

If you determine that the personal data we hold about you is incorrect you have the right to request rectification. We will immediately consider the request and rectify any errors found.

4. Subject Access Request

At any point, you have the right to submit a Subject Access Request. Within a month period, we will respond to the request made. We will not charge a fee for any of the requests above unless the request is 'manifestly unfounded or excessive'. We also reserve the right to withhold personal data if disclosing it would 'adversely affect the rights and freedoms of others".

5. Registering a complaint

If at any point you feel we are being unfair or dismissing your rights as an individual please contact us and let us know.

Charlie@supamodelmanagement.com