

## **BACKGROUND:**

Reflections Talent Agency understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, [www.reflectionstalentagency.co.uk](http://www.reflectionstalentagency.co.uk) ("Our Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested. By using or accessing Our Website or the Services, you agree to the collection, use and disclosure of information in accordance with this Privacy Policy.

### **1. Definitions and Interpretation**

In this Policy the following terms shall have the following meanings:

<b>"Account"</b>	means an account required to access and/or use certain areas and features of Our Site;
<b>"Cookie"</b>	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 13, below; and
<b>"Cookie Law"</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.

### **2. Information About Me**

Our Site is owned and operated by Reflections Talent Agency, a Sole Trader.

Registered Address: Reflections Talent Agency, International House, 142 Cromwell Road, Kensington, London, SW7 4EF

Data Protection Officer:

Name: Emily Maguire

Email address: [mail@reflectionstalentagency.co.uk](mailto:mail@reflectionstalentagency.co.uk)

Telephone number: 07412 833382.

Postal address: Reflections Talent Agency, International House, 142 Cromwell Road, Kensington, London, SW7 4EF

We are a member of (ICO) 'Information Commissioner's Office' [www.ico.org.uk/register](http://www.ico.org.uk/register)

### **3. What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

### **4. What Is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

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### 5. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which We will always work to uphold:

- a) The right to be informed about Our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact Us to find out more or to ask any questions using the details in Part 14.
- b) The right to access the personal data We hold about you. Part 12 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by Us is inaccurate or incomplete. Please contact Us using the details in Part 14 to find out more.
- d) The right to be forgotten, i.e. the right to ask Us to delete or otherwise dispose of any of your personal data that We hold. Please contact Us using the details in Part 14 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to Us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if We are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to Us directly, We are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask Us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about Our use of your personal data or exercising your rights as outlined above, please contact Us using the details provided in Part 14.

Further information about your rights can also be obtained from the Information Commissioner's Office.

If you have any cause for complaint about Our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact Us first, using the details in Part 14.

### 6. What Data Do You Collect and How?

Depending upon your use of Our Site, We may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table. Please also see Part 13 for more information about Our use of Cookies and similar technologies. We do not collect any 'special category' or 'sensitive' personal data. OR personal data relating to children OR data relating to criminal convictions and/or offences.

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Data Collected	How I Collect the Data
<b>Identity Data</b> including first name, last name, username, or similar identifier.	When you email, phone or live chat.
<b>Contact Data</b> including postal address, invoicing address, D.O.B, emergency contact name and number, email address, phone numbers.	Client email or website 'contact form' enquiry.
<b>Business Data</b> including business name, job title, profession, first name, last name, business phone number, invoicing address, email address.	When you email, phone, live chat or send contracts.
<b>Transaction Data</b> includes details about payments and other details of our services you have purchased from us.	When booking a client for work and when registering new clients to enable payment for work undertaken.
<b>Technical Data</b> including internet protocol (IP) address, you login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices.	When you access our website.
<b>Marketing and Communications Data</b> includes your preferences in receiving marketing from us and our third parties and your communication preferences.	When you agree to be contacted with updates about Our services.
<b>Usage Data</b> includes information about how you use our Website and Services.	When accessing Our website and services.
<b>Cookies Data</b> Please refer to section 13 below for information about cookies and how We use them and what kind.	When accessing Our website, We use "cookies" to enhance your experience and gather information about visitors and visits to Our websites.
<b>Third Parties data</b> We may receive information about you through third party portals.	Through casting notices, such as those placed on Spotlight and Mandy.com.
<b>Analytics data</b> includes third-party analytics services (such as Google Analytics) to evaluate your use of the Website, compile reports on activity, collect demographic data, analyse performance metrics, and collect and evaluate other information relating to our Website and internet usage. These third parties use cookies and other technologies to help analyse and provide us the data.	When accessing Our website.
<b>Aggregated Data</b> may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.	When accessing Our website.

## 7. How Do You Use My Personal Data?

Under the Data Protection Legislation, We must always have a lawful basis for using personal data. The following table describes how We may use your personal data, and Our lawful bases for doing so:

What I Do	What Data I Use	My Lawful Basis
Providing and managing your Account.	Identity Data Contact Data Business Data Transaction Data	Consent. Legal Obligation. Performance of Services.
Personalising and tailoring your experience on Our Site.	Contact Data Technical Data Usage Data Business Data	Consent. Legitimate Interests (maintenance of user accounts and comply with user requests). Performance of Services.
Administering Our Site.	Contact Data Technical Data Usage Data Business Data	Consent. Legitimate Interests (maintenance of user accounts and comply with user requests). Performance of Services.
Administering my business.	Contact Data Technical Data Usage Data Business Data	Provide information, and services that you request, or (with your consent) which we think may interest you.
Supplying Our services to you.	Identity Data Contact Data Business Data Transaction Data	Carry out my services you pay for. Provide the relevant Services to you.
Managing payments for Our services.	Identity Data Profile Data Contact Data Business Data Transaction Data	Consent. Performance of services.
Communicating with you.	Contact Data Identity Data Business Data	Consent. Performance of a Services.
Feedback and Testimonials	Identity Data	Consent. Legitimate to show prospective customers a level of trust.

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With your permission and/or where permitted by law, We may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on Our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with Our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

Third Parties whose content appears on Our Site may use third-party Cookies, as detailed below in Part 13. Please refer to Part 13 for more information on controlling cookies. Please note that We do not control the activities of such third parties, nor the data that they collect and use themselves, and We advise you to check the privacy policies of any such third parties.

We will only use your personal data for the purpose(s) for which it was originally collected unless We reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If We do use your personal data in this way and you wish Us to explain how the new purpose is compatible with the original, please contact Us using the details in Part 14.

If We need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, We will inform you and explain the legal basis which allows me to do so.

In some circumstances, where permitted or required by law, We may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

### **8. How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. We will keep personal data for as long as is necessary which is usually the life of Our relationship and up to a period of seven years after Our relationship has ended. We may however be required to retain personal data for a longer period of time to ensure We comply with legislative and regulatory requirements. We review Our retention periods for personal information on a regular basis.

### **9. How and Where Do You Store or Transfer My Personal Data?**

We will only store your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

We may transfer your collected data to storage outside the European Economic Area (EEA). It may be processed outside the EEA to fulfil your order and to receive our Services and deal with payment. If We do store or transfer data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the GDPR. Such steps may include, but not be limited to, the use of legally binding contractual terms between us and any third parties We engage with and the use of the EU-approved Model Contractual Arrangements. Your acceptance of this Privacy Policy shall be your consent permitting Us to store or transfer data outside the EEA if it is necessary for Us to do so.

Data security is of great importance to Us, and to protect your data We have put in place suitable physical, electronic, and managerial procedures to safeguard and secure data collected through my Website. In addition, We limit access to your personal data to third parties 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 personal data breach and will notify you and any applicable regulator of a breach where We are legally required to do so. By giving Us your personal data, you agree to this arrangement. We will do what We reasonably can to keep your data secure.

We have implemented security measures such as a firewall to protect any data and maintain a

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high level of security.

Notwithstanding the security measures that We take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to Us data via the internet and you take the risk that any sending of that data turns out to be not secure despite Our efforts.

### **10. Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

In some limited circumstances, We may be legally required to share certain personal data, which might include yours, if We are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is shared with a third party, as described above, We will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, Our obligations, and the third party's obligations under the law, as described above in Part 9.

### **11. Can I Withhold Information?**

You may access Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict Our use of Cookies. For more information, see Part 13

### **12. How Can I Access My Personal Data?**

If you want to know what personal data We have about you, you can ask Us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 13 clearly marking your correspondence as a subject access request.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover Our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, We aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date We receive your request. You will be kept fully informed of Our progress.

### **13. How Do You Use Cookies?**

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using Our Site, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than Us. Third-party Cookies are used on Our Site for analytical reasons. For more details, please refer to the table below. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

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We use Cookies and similar technologies in order to distinguish you from other users. By using Cookies, We are able to provide you with a better experience and to improve Our Site by better understanding how you use it. Please read this Cookie Policy carefully and ensure that you understand it. Your acceptance of Our Cookie Policy is deemed to occur if you continue using Our Site. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended. If you do not agree to Our Cookie Policy, please stop using Our Site immediately.

Certain features of Our Site depend on Cookies to function. Cookie Law deems some of these Cookies to be “strictly necessary”. These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

The following first-party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
ForceFlashSite	When viewing a mobile site (old mobile under m.domain.com) it will force the server to display the non-mobile version and avoid redirecting to the mobile site.	yes
hs	Security	yes
smSession	Identifies logged in site members	yes
XSRF-TOKEN	Security	yes
svSession	Identifies unique visitors and tracks a visitor’s sessions on a site	no
SSR-caching	Indicates how a site was rendered.	no
smSession	Identifies logged in site members	no

and the following third-party Cookies may be placed on your computer or device:

Name of Cookie	Provider	Purpose
TS*	Functionality	Security
TS01*****	Functionality	Security

Our Site uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the services offered through it.

The analytics service(s) used by Our Site use(s) Cookies to gather the required information. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

The analytics service(s) used by Our Site use(s) the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
_ga _gat _gid	Third	Google	Google Analytics is a web analytics service provided by Google, Inc. used on most of our pages count visitors to count the number of visitors our site receives and to see how users move around our site.

In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

#### 14. How Do I Contact You?

To contact Us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details: for the attention of Emily Maguire.

Email address: mail@reflectionstalentagency.co.uk

Telephone number: 07412 833382

Postal Address: Reflections Talent Agency, International House, 142 Cromwell Road, Kensington, London, SW7 4EF

#### 15. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if We change Our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date. This Privacy Policy was last updated on 26<sup>th</sup> June 2020.

#### 16. Terms and Conditions

Please also visit our Website Terms of Use policy, establishing the use, disclaimers, and limitations of liability governing the use of our Website.



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