



DATA PROTECTION POLICY

Dragon Personal Management Ltd

Contents

Definitions	2
Dragon Personal Management as your Data Controller.....	2
Relationships when Dragon Personal Management is not your Data Controller.....	2
Changes to this Privacy Policy.....	2
How do we make sure your data is used lawfully?.....	3
What personal information do we collect?	4
How will we use your personal information?	5
How long do we keep your information?	5
Where your information may be processed.....	5
Links to other websites	6
Keeping your personal information up-to-date.....	6
Your rights.....	6
If you are unhappy	6

Definitions

In this Privacy Policy:

"you" means the user of Dragon Personal Management

"we/us/Dragon Personal Management " means [Dragon Personal Management Ltd registered in England and Wales, Registered Office: Dragon Personal Management, Kemp House, 152-160 City Road, London EC1V 2NX. Company Number: 11376086

"Services" means any of the services available from Dragon Personal Management , and

"Site" means the site located at www.dragon-pm.com and other connected sites.

Acceptance of this Policy and Dragon Personal Management Terms

By using Dragon Personal Management Services you accept the terms of this Privacy Policy and your related Terms.

Dragon Personal Management as your Data Controller

Dragon Personal Management is a Data Controller for your data. Dragon has a Data Protection Officer who can be contacted via or by writing to Data Protection Officer, Dragon Personal Management Ltd, Kemp House, 152-160 City Road, London EC1V 2NX

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, Dragon Personal Management has notified 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.

Relationships when Dragon Personal Management is not your Data Controller

If you are a Dragon Personal Management client please note that other establishments/organisations may also act as your Data Controller both for the supply of your information to Dragon Personal Management and casting organisations. It is your responsibility to ensure that all other organisations that hold your data eg Spotlight,IMDB Equity and other similar or training establishments only processes your personal data in accordance with your wishes.

Changes to this Privacy Policy

Dragon Personal Management keeps this Privacy Policy under regular review, and may change this policy occasionally by updating our website page "Data Protection Policy". Where practical we will

notify you of changes to this Policy and prompt you to review these. However, you should check the page from time to time to ensure that you are happy with any changes.

How do 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 or casting/job, 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 example if we agree to email casting directors or production companies or theatre companies.
- 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.

For example, by becoming a Dragon Personal Management client we will collect information about you so we can deliver the service to you.

- Complying with 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 Dragon Personal Management 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.

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 submit you for jobs;
- Information/ documents you may provide to prove age, identity or legal requirement to work in the UK or other requirement where the law requires this to confirm discount eligibility;
- 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 Dragon Personal Management users and/or the public via wide circulation or redistribution, and via our historical archives. Therefore you should never include any personal data on your profile that you would wish to remain private.

How will we 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 agency and representation services, in order to submit you to castings and negotiate jobs/contracts from various sources including: Spotlight Equity, National Theatre Wales, casting directors theatre companies, production companies and corporate companies providing your public Spotlight profile and weblinks (eg Spotlight and IMDB and Dragon Personal Management or your personal website info)
- To provide you with important service communications relating to Dragon products or Services;
- To invite you to and manage your attendance at castings;
- To keep your details and records up-to-date and accurate;
- To query jobs/availability
- To arrange meetings/castings/contracts
- To answer your enquiries or otherwise communicate with you;
- Internal record keeping;
- 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.

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

Dragon Personal Management requests that you keep up to date with all your personal information. 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 dragonpersonalmanagement@gmail.com or by writing to Dragon Personal Management Ltd, Kemp House, 152-160 City Road, London EC1V 2NX

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.

If you are unhappy

The theme throughout this Policy is that Dragon Personal Management 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.

Retentions Policy

Document	Minimum Retention Period	Reason	Location Retained	Disposal
Minutes	Infinite	Archive	On computer	Delete on line/shred
Agendas	Infinite	Archive	On computer	Delete on line/shred
Scales & Fees	10 years	Residual and/or repeat fees may arise	On computer	Delete on line/shred
Client Contracts	10 years	Residual and/or repeat fees may arise	On computer	Delete on line/shred
Production Contracts	10 years	Residual and/or repeat fees may arise	On computer	Delete on line/shred
Invoices – paid/unpaid	10 years	Residual and/or repeat fees may arise	On computer	Delete on line/shred
Earnings Statements	10 years	Residual and/or repeat fees may arise	On computer	Delete on line/shred
Client Questionnaire	10 years	Residual and/or repeat fees may arise	On computer	Delete on line/shred
Casting Director Info	10 years	Residual and/or repeat fees may arise	On computer	Delete on line/shred
Bank Payment Info	10 years	Residual and/or repeat fees may arise	On computer	Delete on line/shred
Client Personal Info	10 years	Residual and/or repeat fees may arise	On computer	Delete on line/shred
Quotations	10 years	Residual and/or repeat fees may arise	On computer	Delete on line/shred
Information from Professional Associations	10 years	Residual and/or repeat fees may arise	On computer	Delete on line/shred
Record Keeping				
Electronic files saved using relevant file names	10 years	Residual and/or repeat fees may arise	On computer	Delete on line/shred
General correspondence	10 years	Residual and/or repeat fees may arise	On computer	Delete on line/shred