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## INTRODUCTION

Welcome to the Keston and Keston Casting's ("K&K Casting") privacy policy.

K&K Casting respects your privacy and the privacy of your children and is committed to protecting personal data generally. This privacy policy will inform you as to how we look after your personal data when you visit our website or use our mobile App (regardless of where you visit or use it from) and tell you about your privacy rights and how the law protects you.

## OUR MOBILE APPLICATION

Where we refer to the App in this policy, we refer to the mobile application we have developed which is available on iOS and Android called: Keston & Keston Casting

## A NOTE TO PARENTS/GUARDIANS

Where you are a parent or guardian and you are signing up to this policy on behalf of a Child, we ask that you take the time to explain how their personal data will be used in a manner that you consider appropriate given your Child's age and abilities. Though legally children over the age of 13 can give valid consent to processing of their personal data, we ask that parents or guardians sign this policy on behalf of Children up to the age of 18 years.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. We have worded our policy to be directed at the individual whose data is being processed. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

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### **2. THE DATA WE COLLECT ABOUT YOU**

### **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

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### **5. DISCLOSURES OF YOUR PERSONAL DATA**

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### **1. IMPORTANT INFORMATION AND WHO WE ARE**

#### PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how K&K Casting collects and processes your personal data through your use of this website including any data you may provide through contacting us by email or when you use our App.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices, statements and privacy policies and is not intended to override them.

## CONTROLLER

K&K Casting is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise, please contact the DPO using the details set out below.

## CONTACT DETAILS

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: Keston and Keston Ltd trading as Keston & Keston Casting.

Email address: [info@kestonandkeston.com](mailto:info@kestonandkeston.com)

Postal address: Keston & Keston, 2 Television Centre, 101 Wood Lane, White City, London, W12 7FA

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated on 10th November 2024. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## THIRD-PARTY LINKS

This website or our App 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.

## **2. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes home address, email address and telephone numbers.
- **Diary Data** – details of your availability or other timetable information relating to when you have time free or availability to perform generally.
- **Guardian Data** includes name and contact details (delivery address, email address and telephone number)
- **Agent Data** includes agent's name and contact number.
- **School Data** includes school name, address, headteacher's details (name)
- **Qualifications Data:** includes training and experience data and details of professional credits and similar or related experience (where applicable)
- **Production Company Data** – **Special Category Data**: this can include birth certificate, school letter, medical enquiry form, food allergies/food preference sheet and other health and fitness related information such as measurements including height, weight and other genetic identifiers such as, but not limited to, eye and hair colour.
- **Technical Data** includes internet protocol (IP) address, your 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 you use to access our website or the App.
- **Usage Data** includes information about how you use our website, the App and our other products and services.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **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 or App 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.

## SPECIAL CATEGORIES OF PERSONAL DATA (PRODUCTION COMPANY DATA)

We do collect **Special Categories of Personal Data** about you and this kind of data generally includes and covers 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.

We won't collect the above data about you where we can avoid it and we would prefer that you limit the amount of Special Category data that you provide to us.

**The Special Categories of personal data that we may collect** as part of the services we provide are as follows:

- Race;
- Ethnic origin;
- Religion;
- Height, weight and other physical measurements; and
- Medical/ Health data (including details of food allergies and any other relevant medical data, whether physical or mental).

This data is required in order to understand your needs and provide you and relevant Production Companies with a better service.

## IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time. If you refuse to provide any data that may be requested by a Production Company, you understand that this might mean that you may not be cast for a particular role.

## **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us any of the above data categories by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - register for our casting database services;
  - create an account on our website or the App;
  - subscribe to our service or publications; or

- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties as set out below
- **Production Company Data** and **School Data** from your education establishment where you instruct your School or other education provider to provide information to K&K Casting directly.

#### **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where you have given your express consent.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Where we have to act to protect your vital interests in a situation where you are unable to give consent.

Generally, we do not rely on consent as a legal basis for processing your personal data (except for the Production Company Data) although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We will ask for you give your consent so that we can make your special categories of personal data (Production Company Data) available to other third parties.

#### **PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To deal with any emergency health issues, and assisting emergency services.	(a) School Data (b) Agent Data (c) Qualifications Data (d) Guardian Data (e) <b>Production Company Data</b> - <b>Special Category Data</b> (f) Identity (g) Contact	Where we have to act to protect your vital interests where you are unable to give consent such as in an emergency situation (e.g. allergic reaction) we will provide whatever information is required to emergency services as long as we feel that this is done to protect your interests and it doesn't present a disproportionate risk to your right to privacy.
To process and deliver the casting services we offer:  (a) Manage requests from Production Companies and to make recommendations to them.  (b) Arranging for interviews, trials, performances and rehearsals with Production Companies.	(a) School Data (b) Agent Data (c) Qualifications Data (d) Guardian Data (e) <b>Production Company Data</b> - <b>Special Category Data</b> (f) Identity (g) Contact	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)  (c) With your Consent (in relation to the <b>Production Company Data</b> only)

<p>To provide Production Companies with any requested Production Company Data that may be required by a particular Production.</p>	<p>(e) <b>Production Company Data</b> – <b>Special Category Data</b></p>	<p>Only with your Consent – we ask for your consent for this purpose at the very outset of the process, and when we ask you for additional information we will still rely on your original consent as long as we are still using that data for the same purpose as it was originally collected for (<i>in order for K&amp;K Casting to provide casting services and other information required by and for third party Production Companies</i>).</p>
<p>To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy</p>	<p>(a) School Data (b) Agent Data (c) Qualifications Data: (d) Guardian Data</p>	<p>(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity (b) Contact (c) Guardian (d) Usage (e) Marketing and Communications</p>	<p>(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>



To administer and protect our business, the App and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, the App, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website and the App updated and relevant, to develop our business and to inform our marketing strategy)

## MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

## OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

## COOKIES

We do not use cookies on our website or in our App.

## CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us on [info@kestonandkeston.com](mailto:info@kestonandkeston.com) If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data with the parties set out below for the purposes set out in the table *Purposes for which we will use your personal data* above.

- Production Companies who employ the K&K Casting service. These are businesses who K&K Casting have an agreement with to cast for general or specific roles and performances. This includes all children's casting and general management services
- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Where we disclose any of your personal data to a Production Company, we ensure that we have a written contract in place with that Production Company which protects your personal data to the extent legally required under UK law.

When we share any of your personal data with Production Companies, we always try to limit the amount of personal data that we share to the minimum required to achieve the purpose of assisting with casting for that specific Production Company. Where a Production Company requires any personal data which might be considered to be a Special Category of personal data, we provide this by request only because this data is considered to be of higher risk than other personal data and we don't think it is required to provide this at the outset to Production Companies on every occasion.

We will normally endeavour to inform you when and what information we have disclosed or are disclosing to a Particular Production Company, but you can ask us this at any time by contacting us.

## **6. INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside of the United Kingdom without your prior express written consent and we ask that our Production Company customers keep your personal data in the UK too.

## **7. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other 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.

## **8. DATA RETENTION**

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. We may delete any of your data that we reasonably consider is either no longer accurate or no longer necessary, without notice to you at any time. You should inform us as soon as possible if your position changes or if your personal data becomes or is likely to become inaccurate or outdated for any reason.

By law we have to keep basic information about our customers (including Contact and Identity, Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **9. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact us.

### **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure 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 in relation to your request to speed up our response.

### **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. GLOSSARY**

### **LAWFUL BASIS**

**Consent** must be specific, clear and unambiguous. We ask for your general consent to provide the information you provide to us on to third party Production Companies when requested. You can withdraw your consent for this purpose at any time, but that would prevent us from being able to provide our services.

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at: info@kestonandkeston.com.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

#### THIRD PARTIES

##### EXTERNAL THIRD PARTIES

- Production Companies with whom K&K Casting have an agreement with to provide casting services.

#### YOUR LEGAL RIGHTS

You have the right to:

**1. Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**2. Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**3. Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**4. Object to processing** of your personal data where we are relying on a legitimate interest (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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**5. Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**6. Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**7. Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.