

Head Over Heels Entertainment
Privacy Policy, May 2018

This policy details the nature of personal data stored by the above named company in relation to performers who we employ in the capacity of booking agent. For the purposes of this document we will refer to personnel booked by us for performances on a freelance/adhoc basis, as 'performers'.

Our legal justification under Article 6 of the GDPR for collecting this data is Legitimate Interests. Processing of this data is necessary in our capacity as a bookings agent to secure and administrate paid bookings on our performers' behalf. We process this data in ways that our performers would reasonably expect, as detailed below, and which we believe to have a minimal privacy impact on them. It is in both our performers' and our own commercial interests to collect and process this data. Data is obtained directly from our performers on request as and when it is needed, and is stored on our secure internal cloud-based file share systems to facilitate future bookings requiring the same information. For this reason we do not intend to obtain individual written Consent to retain personal data already held on our system or to retain newly obtained data from this point onwards.

If at any stage any person for whom we hold personal data records has any questions or concerns regarding our methods or reasons for holding this data, we would encourage them to contact Hayley Griffiths (Head Over Heels Entertainment) on Hayley@hohentertainment.co.uk / +44 7739710142.

What personal information do we collect and store? Why is it being collected?

Below is a breakdown of performers' personal data categories collected by Head Over Heels Entertainment and our reasons for collecting and storing this information.

- **Contact details**, i.e. mobile phone numbers and email addresses: held for the purpose of contacting performers regarding arrangements for professional engagements.
- **Passport scans**: held for the purpose of booking flights (or other international travel) for professional engagements.
- **Home addresses** as included on performers' invoices: HMRC requires us to store our last 10 years of invoices for our tax records.

- **Bank account details** as included on performers' invoices: HMRC requires us to store our last 10 years of invoices for our tax records. Bank details are also saved on our Santander online banking system in order to process payments.

- **Car registration numbers**, makes and models: held for the purpose of arranging parking or access to site for performances.

- **Dietary requirements**: held for the purpose of ensuring performers are properly catered for on performances.

Who is collecting this information?

This information is being collected by employees of Head Over Heels Entertainment, a live music booking agency, under the supervision of Hayley Griffiths.

How is this data being collected?

Data is collected directly from the person to whom the data relates via email or occasionally via telephone, on request. For acts where we communicate with a designated band leader or coordinator, that person will collect and pass on their band members' personal data to us via email.

How will this data be used?

- We will use performers' contact details to communicate with them regarding professional engagements.
- We will use performers' passport scans to arrange flight/(other international transport) bookings for overseas performances. Passport details are usually required by airlines to complete these bookings.
- We will use performers' car registration details to arrange on-site access or parking for performances that require driving.
- We will use performers' dietary requirements to ensure they are suitably catered for on performances.
- We will use performers' bank account details to process payments. Home addresses are a required component of purchase invoices under HMRC

guidelines.

Who will this data be shared with?

For the purposes of this document, the term 'client' is used to refer to an individual or entity with which Head Over Heels Entertainment has entered or is in the process of entering into an agreement to provide musical entertainment services. Our client contracts are being updated to protect our performers' privacy, to include a clause stipulating that in cases where their personal data is shared with our client this must be treated as strictly confidential, must be deleted immediately upon completion of the contracted engagement, and may not be shared with any third parties.

Head Over Heels Entertainment clients typically fall into (but are not limited to) the following categories: wedding/event planners; corporate event bookers; private individuals organising events.

- Your bank account details and home address will only be accessible to Head Over Heels Entertainment employees and will not be shared with our clients or third parties. Your invoices will be shared with HMRC for tax purposes.
- Your passport details may be shared on an individual basis with clients or travel agents in cases where flight/(transport) bookings are being arranged directly by that client or agency.
- Your car registration details and dietary requirements will be shared with clients in order for them to implement necessary arrangements on your behalf.
- Your contact details (phone numbers and email addresses) may occasionally be shared with clients in circumstances where that client requires a point of contact for a performance and no Head Over Heels Entertainment representative is in attendance; you will be informed if you have been designated as the client's point of contact for a given performance. On occasion we may deem it suitable to put performers directly in touch with each other to facilitate arrangements for performances (e.g. arranging lift-shares). Should you wish for Head Over Heels Entertainment to keep your contact details restricted to use by our employees and that they not be shared with clients or third parties, please inform us and we will make a note on your contact record.

How long will this data be stored?

The only data type listed above which is subject to expiry is passport details, which will be deleted from our system either on expiry or when we are notified that a passport has been updated/replaced – whichever happens first.

All other data types will be stored for as long as there is a possibility of future bookings being offered to that performer, unless that performer requests their data to be updated/removed.

We commit to immediately update or delete any incorrect or out-of-date records relating to any of the above categories if a performer advises us that their data has changed or is inaccurate.

General

Head Over Heels Entertainment formally recognize the existence of each of data subject's rights, including the right to request the updating or removal of data records at any time, where relevant, and the right to lodge a complaint with a supervisory authority.

- Right to be forgotten: An individual may request that an organization delete all data on that individual without undue delay.
- Right to object: An individual may prohibit certain data uses.
- Right to rectification: Individuals may request that incomplete data be completed or that incorrect data be corrected.
- Right of access: Individuals have the right to know what data about them is being processed and how.
- Right of portability: Individuals may request that personal data held by one organization be transported to another.

Head Over Heels Entertainment stipulate that in order to fulfil our contractual obligations to our clients and to perform our function as a booking agent on our performers' behalf, we may require certain personal data types to be shared with us by our performers: e.g. contact details and passport scans. It should be understood by our performers that upon acceptance of a booking, this information may be required by us under the above privacy protection terms, and that if the performer chooses to withhold this data their booking with us may thereby be invalidated due to our inability to complete our

administrative duties.

Under our current business operating model it is unlikely that the uses of your data will change materially in the future, and we will notify you if any material changes are made. Our data storage platforms may be subject to change, in which case we will of course ensure that any new chosen platform conforms to GDPR and all existing data protection law.