



## Linden Staub Ltd Privacy Policy

Issued by **Linden Staub Ltd** registration number **15720497** whose registered address is at 3rd Floor, 29 Charlotte Road, London, EC2A 3PF (the “Agency”)

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we will store and handle that data, and keep it safe. There is a lot of information here but we want you to be fully informed about your rights, and how we use your data.

If you still can't find the information you need, you can email us at [mail@lindenstaub.com](mailto:mail@lindenstaub.com) The report below covers the following points:

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### 1. WHO ARE WE?

We are Linden Staub Ltd. Our company registration number is OC403379 and our registered office is at 3rd Floor, 29 Charlotte Road, London, EC2A 3PF. We are the data controller of the Personal Information (explained below) that we collect about you. As a data controller, we are responsible for ensuring our systems, processes, suppliers and people comply with Data Protection Legislation in relation to your personal information.

If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact us either at our registered office or by email at [mail@lindenstaub.com](mailto:mail@lindenstaub.com)

### 2. WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

For the purposes of this Privacy Notice “personal information” consists of any information that relates to you and/or information from which you can be identified, directly or indirectly. For example, your name, address, telephone number, photographs, location data, an online identifier (e.g. cookies identifiers and your IP address). When we combine other information (i.e. information that does not, on its own, identify you) with Personal Information, we treat the combined information as Personal Information. We may collect use, store and transfer different kinds of Personal Information about you which we have grouped together as follows:

- Identity and Contact Data includes e.g. first name, last name, company, position, address (whether business or individual), email address, telephone number and images and photographs of you.



- Payment Data includes your payment details such as e.g. bank account details, credit or debit card.
- Technical and Usage Data includes e.g. internet protocol (IP) addresses, the type of browser used while visiting our website and the numbers of users who visit our website, usage session dates and duration, page views, and how you use our website.

If you are one of our models (or prospective models), we may also collect some of your sensitive personal data such as:

- Race
- Ethnicity
- Special Skills
- Political opinions
- Religious/Philosophical Beliefs
- Ethical Beliefs
- Trade Union Membership
- Biometric Data
- Identification Documents
- Visa Documents
- Medical History

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

Generally, we collect your personal information when you interact with us (for example, when entering into a relationship with a model or client). However, from time to time we also need to collect personal information from other third parties in connection with our relationship with you. We also look at how our users access and use our website, so we can offer the best possible experience. We use different methods to collect data from and about you including:

- A. Personal Information you provide directly. You may give us your Identity and Contact Data and Finance Data corresponds with us by email, phone or otherwise. This includes Personal Information that you provide when you:
- Enter into a relationship with us a model,
  - Purchase any of our services as a client,
  - Otherwise contact us.

B. Automated technologies or interactions. As you interact with our website, we may automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this Personal Information by using cookies and other similar technologies.

C. Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below: - e.g. for models - background checks, feedback from clients, publicly available sources such as magazines, articles, documentaries and social media. - e.g. companies house, publicly available sources

### **4. HOW DO WE USE YOUR INFORMATION?**

We may use the personal information that we collect for the following purposes:

- I. Deliver our Services – to you, whether a model or client, as well as to administer systems and Accounts;
- II. Business Purposes - for business monitoring and internal record keeping including maintaining our accounts, complying with good practice and for other administrative, operational and security reasons;
- III. Analysis Purposes - for assessment and analysis of the fashion and beauty industries, clients, and other services, and to create sales, marketing and promotional plans;
- IV. Statistical Purposes – for research, statistical and behavioral analysis;



- V. Services and Website Improvement – to enhance our services, to ensure content from our website is presented in the most effective manner for you and your computer, to enhance the user experience, and to develop new services;
- VI. Legal Obligations - to comply with our legal and regulatory obligations; and
- VII. Updates - to communicate with you, including communicating with you about your transactions with us, giving you important information about your membership, sending you notices about any material changes to our Privacy Notice, and, where permitted by you and applicable laws, marketing, sending you offers and promotions for our services.

The law allows us to use the personal information as set out above on the basis that the processing is necessary for the performance of a contract with you, we are acting in our "legitimate interests" in the promotion and efficient running of our business, or the processing is necessary in order to comply with our legal obligations.

#### **MARKETING COMMUNICATIONS**

When you join us as a model or purchase any of our services as a client, request information on our website or otherwise communicate with us, we and specific third parties may use your Identity and Contact Data to send you marketing-related correspondence by email, post, text message or phone calls related to our services. When we process your personal information for marketing purposes, we do so on the basis that it is in our legitimate interests to do so, in promoting our organisation and to personalise and to target more effectively our marketing communications to ensure, to the extent possible, that any marketing-related correspondence is relevant to you. If you are currently receiving regular mailings from us and would like this to stop, you can opt out and ask for your information to be removed from our database. To do this, please click "Unsubscribe" from any marketing or promotional email you receive from us. This will ensure that we will not send you regular mailings of that sort again unless you opt back in, but we will still have your email information.

#### **COMBINING PERSONAL INFORMATION**

We may combine the personal information that we collect from you (including information received from our affiliates) to the extent permitted by applicable law. For example, we may combine various different databases that contain your personal information to allow us to provide better support services and more personalised content (such as, marketing).

#### **TO WHOM DO WE DISCLOSE YOUR INFORMATION?**

We will only use your Personal Information for our internal business purposes, some of which are mentioned above. We may disclose your information to the following entities:

##### **I. OUR CLIENTS**

If you are a model, we may disclose your personal information to our clients, in order to fulfill our contractual obligations to you.

##### **II. AFFILIATE AGENCY**

We work with model and/or talent agencies in jurisdictions outside of the UK who have either engaged us to provide services on their behalf, or have been engaged by us to provide services on our behalf outside the UK.

##### **III. SERVICE PROVIDERS**

We use third party service providers to help us to administer certain activities and services on our behalf, such as e.g. providing our website, hosting our database, providing payroll services, payment facilitator, and analysing usage of our Services. We may share Personal Information about you with such third party service providers solely for the purpose of enabling them to perform services on our behalf and they will operate only in accordance with our instructions. Here are examples of third- party service providers we use: e.g. IT and Software Providers – we use IT and software providers to provide our website and other IT services. We currently use Media Slide Model Agency Booking Software, Google Drive Hosting Platform.

##### **IV. THIRD PARTIES WHEN REQUIRED BY LAW OR TO PROTECT OUR SERVICES**



We will disclose your personal information to comply with applicable law or respond to valid legal process, including from our regulators, law enforcement or other government agencies; to protect our customers (e.g. to prevent spam or attempts to defraud users of our services); to operate and maintain the security of our website (e.g. to prevent or stop an attack on our systems or networks); or to protect our rights or property, including enforcing any terms or agreements governing the use of our services.

#### V. OTHER PARTIES IN CONNECTION WITH CORPORATE TRANSACTIONS

We may disclose your personal information to a third party in the event that all or substantially all of our business or assets are or are intended to be sold or otherwise assigned to another entity.

#### VI. OTHER PARTIES AT YOUR DIRECTION

We may share personal information about you with third parties when you request such sharing.

### 5. WHAT DO WE DO TO KEEP YOUR INFORMATION SECURE?

We have put in place appropriate physical and technical measures to safeguard the personal information that we collect in connection with our services. We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. However, please note that although we take appropriate steps to protect your personal information, no website, device, online application or transmission of data, computer system or wireless connection is completely secure and therefore we cannot guarantee the security of your personal information.

### INTERNATIONAL TRANSFER OF DATA

The personal information that we collect from you may be stored and processed in your region, or transferred to, stored at or otherwise processed outside the European Economic Area ("EEA"), including but not limited to the United States of America & The Russian Federation. By using our services and/or providing us with your personal information, you acknowledge that we will collect, transfer, store and process your information outside the EEA. We will take all steps reasonably necessary to ensure that your personal information is kept secure and treated in accordance with this Privacy Notice and the requirements of applicable law wherever the data is located. Where we transfer your personal information outside the EEA to other third parties, we will ensure that appropriate transfer agreements and mechanisms, such as the EU Standard Contractual Clauses, are in place to help ensure that our third party service providers provide an adequate level of protection to your personal information.

### 6. DATA RETENTION – HOW LONG WE WILL STORE/KEEP YOUR PERSONAL INFORMATION

We retain your personal information for as long as necessary to fulfill the purposes for which it was collected as outlined in this privacy notice unless a longer retention period is required by law. When your personal information is no longer required for the purpose it was collected or as required by applicable law, it will be deleted and/or returned to you in accordance with applicable law.

### 7. ACCESSING YOUR PERSONAL INFORMATION AND OTHER RIGHTS YOU HAVE

We will collect, store and process your personal information in accordance with your rights under any applicable data protection laws. Under certain circumstances, you have the following rights in relation to your personal information:

I. Subject Access - you have the right to request details and copies of the personal information which we hold about you.

II. Data Portability – you may, in certain circumstances, request us to port (that is, transmit) your personal information directly to another organisation.



III. Rectification – we want to ensure that the personal information about you that we hold is accurate and up to date. If you think that any information we have about you is incorrect or incomplete, please let us know. To the extent required by applicable laws, we will rectify or update any incorrect or inaccurate personal information about you.

IV. Erasure ('right to be forgotten') - you have the right to have your personal information 'erased' in certain specified situations.

V. Restriction of processing – you have the right in certain specified situations to require us to stop processing your personal information.

VI. Object to processing – you have the right to object to specific types of processing of your personal information, such as, where we are processing your personal information for the purposes of direct marketing.

VII. Right to Withdraw Consent – where you have consented to our processing of your personal information, you have the right to withdraw such consent at any time. In the event you wish to withdraw your consent to processing, please contact us using the details provided in section 12.

## **ENFORCING YOUR RIGHTS**

If you wish to enforce any of these rights please contact us at [mail@lindenstaub.com](mailto:mail@lindenstaub.com). We will respond to your request promptly and by no later than one month from receipt, unless a longer period is permitted by applicable data protection laws. If permitted by applicable data protection laws, we may charge a reasonable fee for dealing with your request which we will notify to you.

## **COMPLAINTS**

If you are concerned that we have not complied with your legal rights under applicable data protection laws, you may contact the Information Commissioner's Office ([www.ico.gov.uk](http://www.ico.gov.uk)) which is the data protection regulator in the UK which is where Linden Staub is located. Alternatively, if you are based outside the UK, you may contact your local data protection supervisory authority.

## **8. THIRD-PARTY LINKS ON OUR WEBSITE**

Our website may contain links to other third party websites that are not operated by us. These linked sites and applications are not under our control and as such, we are not responsible for the privacy practices or the content of any linked websites and online applications. We strongly recommend that you take the time to review the privacy policies of any third parties to which you provide personal information.

## **9. CHANGES TO THIS PRIVACY NOTICE**

Any changes we may make to this Privacy Notice 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.

## **10. CONTACT US / FURTHER INFORMATION**

If you have any questions regarding the collection, processing, or use of your personal information or if you wish to exercise any of your rights, please contact us:

I. BY MAIL: Linden Staub Ltd, 3rd Floor, 29 Charlotte Road, London, EC2A 3PF

II. BY EMAIL: [mail@lindenstaub.com](mailto:mail@lindenstaub.com)

III. BY TELEPHONE: Monday to Friday 10am – 4pm +442038710902