

Chapters People Ltd – Privacy Policy

This Privacy Policy explains what we do with your personal data, whether we are in the process of helping you find a job, continuing our relationship with you once we have found you a role, providing you with a service, receiving a service from you, using your data to ask for your assistance in relation to one of our freelancers or you are visiting our website.

It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us and we are committed to protecting and safeguarding your data privacy rights.

This Privacy Policy applies to the personal data of our Website Users, freelancers, Clients, Suppliers, and other people whom we may contact in order to find out more about our freelancers or whom they indicate is an emergency contact. It also applies to the emergency contacts of our Staff.

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR"), the company responsible for your personal data can be found here.

It is important to point out that we may amend this Privacy Policy from time to time, but any updates can be found here.

If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and, where relevant, we have described these as well.

This Privacy Policy applies in relevant countries. Different countries may approach data privacy in slightly different ways, however we ensure that we're complying with all applicable data privacy protections, no matter where you are.

What kind of personal data do we collect?

Crew Data: In order to provide the best possible employment opportunities that are tailored to you, we need to process certain information about you. We only ask for details that will genuinely help us to help you, such as your name, age, contact details, employment history, emergency contacts, immigration status and social security number (and of course you may choose to share other relevant information with us). Where appropriate and in accordance with local laws and requirements, we may also collect information related to your health, diversity information or details of any criminal convictions.

Client Data: If You Are A Chapters People Ltd Customer, We Need To Collect And Use Information About You, Or Individuals At Your Organisation, In The Course Of Providing With Services Such As: (I) Finding Crew Who Are The Right Fit For You Or Your Organisation.

We Need A Small Amount Of Information From Our Suppliers To Ensure That Things Run Smoothly. We Need Contact Details Of Relevant Individuals At Your Organisation So That We Can Communicate With You. We Also Need Other Information Such As Your Bank Details So That We Can Pay For The Services You Provide (If This Is Part Of The Contractual Arrangements Between Us).

People Whose Data We Receive From freelancers And Staff, Such As Referees And Emergency Contacts: In Order To Provide freelancers With Suitable Employment Opportunities Safely And Securely And To Provide For Every Eventuality For Them And Our Staff, We Need Some Basic Background Information. We Only Ask For Very Basic Contact Details, So That We Can Get In Touch With You Either For A Reference Or Because You've Been Listed As An Emergency Contact For One Of Our freelancers Or Staff Members.

Website Users: We Collect A Limited Amount Of Data From Our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, and the times that our website is most popular.

A number of elements of the personal data we collect from you are required to enable us to fulfil our contractual duties to you or to others. Depending on the type of personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfil our contractual requirements or, in extreme cases, may not be able to continue with our relationship.

Freelancer Data: There are two main ways in which we collect your personal data:

Directly from you on interview and Emails direct from you

People Whose Data We Receive From freelancers And Staff, Such As Referees And Emergency Contacts: We collect your contact details only where a freelancers or a member of our Staff puts you down as their emergency contact or where a freelancers gives them to us in order for you to serve as a referee.

How do we use your personal data?

Freelancer Data: The main reason for using your personal details is to help you find employment or other work roles that might be suitable for you. The more information we have about you, your skillset and your ambitions, the more bespoke we can make our service. Where appropriate and in accordance with local laws and requirements, we may also use your personal data for things like marketing, profiling and diversity monitoring. Where appropriate, we will seek your consent to undertake some of these activities.

Client Data: The main reason for using information about Clients is to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly. This may involve: (i) identifying freelancers who we think will be the right fit for you or your organisation.

Website Users: Unless you specify otherwise, we may share your information with providers of film crew, production companies, marketing automation platforms and social media services to make sure any advertising you receive is targeted to you.

How do we safeguard your personal data?

We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent unauthorised access to and misuse of, your personal data.

How long do we keep your personal data for?

If we have not had meaningful contact with you (or, where appropriate, the company you are working for or with) for a period of two years, we will delete your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).

How can you access, amend or take back the personal data that you have given to us?

Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please contact us. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

Right to object: If we are using your data because we deem it necessary for our legitimate interests to do so and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.

Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities (for example, for profiling your suitability for certain roles), or consent to market to you, you may withdraw your consent at any time.

Data Subject Access Requests (DSAR): Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or Delete such information. At this point we may comply with your request or, additionally do one of the following:

- we may ask you to verify your identity, or ask for more information about your request; and

Right to erasure: In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will Delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

Who is responsible for processing your personal data on the Chapters People Ltd website?

Chapters People Ltd controls the processing of personal data on its website(s).

Long Form Detailed Sections

What Kind Of Personal Information Do We Collect?

So you're looking for a bit more insight into what data we collect about you? Here's a more detailed look at the information we may collect. The information described below is, of course, in addition to any personal data we are required by law to process in any given situation.

Freelancer Data: Depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the information listed below to enable us to offer you employment opportunities which are tailored to your circumstances and your interests. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will not process the data in those jurisdictions:

- Name;
 - Age/date of birth;
 - Birth number;
 - Sex/gender;
 - Contact details;
 - Education details;
 - Employment history;
 - Emergency contacts and details of any dependants;
 - Passport details;
 - Nationality/citizenship/place of birth;
 - A copy of your driving licence and/or passport/identity card;
 - Financial information (where we need to carry out financial background checks);
 - National Insurance Number
 - Information on your interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on our website;
 - Extra information that you choose to tell us;
 - Extra information that your referees chooses to tell us about you;
- Extra information that our Clients may tell us about you, or that we find from other third party sources such as job sites;

Please note that the above list of categories of personal data we may collect is not exhaustive.

Freelancer Data: The data we collect about Clients is actually very limited. We generally only need to have your contact details or the details of individual contacts at your organisation (such as their names, telephone numbers and email addresses) to enable us to ensure that our relationship runs smoothly. We may also hold extra information that someone in your organisation has chosen to tell us. If we need any additional personal data for any reason, we will let you know.

Supplier Data: We don't collect much data about Suppliers – we simply need to make sure that our relationship runs smoothly. We'll collect the details for our contacts within your organisation, such as names, telephone numbers and email addresses. We'll also collect bank details, so that we can pay you. We may also hold extra information that someone in your organisation has chosen to tell us.

People Whose Data We Receive From Freelancers And Staff, Such As Referees And Emergency Contacts: All we need from referees is confirmation of what you already know about our freelancers or prospective member of Staff, so that they can secure that job they really want. Emergency contact details give us somebody to call on in an emergency. To ask for a reference, we'll obviously need the referee's contact details (such as name, email address and telephone number). We'll also need these details if our freelancers or a member of our Staff has put you down as their emergency contact so that we can contact you in the event of an accident or an emergency. **HOW DO WE COLLECT YOUR PERSONAL DATA?**

Freelancer Data: We collect freelancers personal data in three primary ways:

1. Personal data that you, the freelancer, give to us;
2. Personal data that we receive from other sources; and
3. Personal data that we collect automatically.

Personal data you give to us

Chapters needs to know certain information about you in order to provide a tailored service. This will enable us to provide you with the best opportunities, and should save you time in not having to trawl through information about jobs and services that are not relevant to you.

There are numerous ways you can share your information with us. It all depends on what suits you. These may include

- Entering your details via an application form, as part of the registration process;
- Leaving a hard copy CV at a Chapters People Ltd office;
- Emailing your CV to a Chapters People Ltd or being interviewed by them;

Personal data we receive from other sources

We also receive personal data about freelancers from other sources. Depending on the relevant circumstances and applicable local laws and requirements, these may include personal data received in the following situations:

- Your referees may disclose personal information about you;
- Our Clients may share personal information about you with us;
- We may obtain information about you from searching for potential freelancers from third party sources, such as LinkedIn and other job sites;
- If you 'follow' us on Instagram we will receive your personal information from those sites; and
- Personal data we collect automatically

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.

How Do We Use Your Personal Data?

Obviously, our main area of work is connecting the right freelancers with the right jobs. We've listed below various ways in which we may use and process your personal data for this purpose, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.

- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment;
- Providing you with our website services and to facilitate the recruitment process;
- Assessing data about you against jobs which we think may be suitable for you;
- Sending your information to Clients/Production, in order to apply for jobs or to assess your eligibility for jobs;
- Enabling you to submit your CV, apply online for jobs or to subscribe to alerts about jobs we think may be of interest to you;
- Carrying out our obligations arising from any contracts entered into between us;
- Carrying out our obligations arising from any contracts entered into between Chapters People Ltd and third parties in relation to your recruitment;
- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties; and
- Processing your data to enable us to send you communications which we think are likely to be of interest to you.

We may use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not happy about this, in certain circumstances you have the right to object and can find out more about how and when to do this here.

Marketing Activities

We may periodically send you information that we think you may find interesting, or to ask for your help with connecting other freelancers with jobs. In particular, we may wish to use your data for the purposes listed below, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive. To:

- send you details of reports, networking and client events, and general information about the industry sectors which we think might be of interest to you;

Soft opt-in consent is a specific type of consent which applies where you have previously engaged with us (for example by submitting a job application or CV, or registering a vacancy to be filled), and we are marketing other recruitment-related services. Under 'soft opt-in' consent, we will take your consent as given unless or until you opt out. For most people, this is beneficial as it allows us to suggest other jobs to you alongside the specific one you applied for, significantly increasing the likelihood of us finding you a new position. For other types of e-marketing, we are required to obtain your explicit consent.

We may also disclose certain this (suitably anonymised where relevant) data to Clients where this is contractually required or the Client specifically requests such information to enable them to comply with their own employment processes.

This information is what is called 'sensitive' personal information and slightly stricter data protection rules apply to it. We therefore need to obtain your explicit consent before we can use it. We'll ask for your consent by offering you an opt-in. This means that you have to explicitly and clearly tell us that you agree to us collecting and using this information.

Who Do We Share Your Personal Data With?

Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of people:

- Production companies and their employees, whether they be full time or free lance
- Other Chapters People Ltd crew members, where appropriate and genuinely requested to do so

- If Chapters People Ltd merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company.

How Do We Safeguard Your Personal Data?

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.

If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately. Details of how to contact us can be found here.

How Long Do We Keep Your Personal Data For?

We will Delete your personal data from our systems if we have not had any meaningful contact with you (or, where appropriate, the company you are working for or with) for two years (or for such longer period as we believe in good faith that the law or relevant regulators require us to preserve your data). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

For those crew whose services are provided via a third party company or other entity, "meaningful contact" with you means meaningful contact with the company or entity which employees your services. Where we are notified by such company or entity that it no longer has that relationship with you, we will retain your data for no longer than two years from that point or, if later, for the period of two years from the point we subsequently have meaningful contact directly with you.

When we refer to "meaningful contact", we mean, for example, communication between us (either verbal or written), or where you are actively engaging with our online services. If you are a freelancers we will consider there to be meaningful contact with you if you submit your updated CV onto our website or take part in any of our online training. We will also consider it meaningful contact if you communicate with us about potential roles, either by verbal or written communication or click through from any of our marketing communications. Your receipt, opening or reading of an email or other digital message from us will not count as meaningful contact – this will only occur in cases where you click-through or reply directly.

How Can You Access, Amend Or Take Back The Personal Data That You Have Given To Us?

One of the GDPR's main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.

To get in touch about these rights, please contact us. We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

Right to object: this right enables you to object to us processing your personal data

The "legitimate interests" and "direct marketing" categories above are the ones most likely to apply to our Website Users, freelancers, Clients and Suppliers. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:

- we can show that we have compelling legitimate grounds for processing which overrides your interests; or
- we are processing your data for the establishment, exercise or defence of a legal claim.

If your objection relates to direct marketing, we must act on your objection by ceasing this activity.

Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.

Right to erasure: You have the right to request that we erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:

- the data are no longer necessary for the purpose for which we originally collected and/or processed them;

- where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
- the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
- it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or
- if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

Right to restrict processing: You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.

The circumstances in which you are entitled to request that we restrict the processing of your personal data are:

- where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
- where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
- where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
- where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.

If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

Right to rectification: You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

Right of data portability: If you wish, you have the right to transfer your personal data between data controllers.

Right to lodge a complaint with a supervisory authority

Cookies Policy

What's a cookie?

A "cookie" is a piece of information that is stored on your computer's hard drive and which records your navigation of a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic. Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

How do we use cookies?

We use cookies to do two things:

- to track your use of our website. This enables us to understand how you use the site and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our website and services in response to what our visitors want and need; and

Cookies are either:

- Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your computer; or
- Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics and for personalisation (see below).

Cookies can also be categorised as follows:

- Strictly necessary cookies: These cookies are essential to enable you to use the website effectively, Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

- Performance cookies: These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.

- Functionality cookies: These cookies allow our website to remember choices you make and provide enhanced features. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video. The information these cookies collect is usually anonymised.

Our Legal Bases For Processing Your Data

Legitimate Interests

Article 6(1)(f) of the GDPR is the one that is relevant here – it says that we can process your data where it "is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."

Freelancer Data:

We have to make sure our business runs smoothly, so that we can carry on providing services to freelancers like you. We therefore also need to use your data for our internal administrative activities, like payroll and invoicing where relevant.

We have our own obligations under the law, which it is a legitimate interest of ours to insist on meeting. If we believe in good faith that it is necessary, we may therefore share your data in connection with crime detection, tax collection or actual or anticipated litigation.

Client Data:

To ensure that we provide you with the best service possible, we store your personal data as well as keeping records of our conversations, meetings, registered jobs and placements.

Consent

In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent.

Article 4(11) of the GDPR states that (opt-in) consent is "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her." In plain language, this means that:

- you have to give us your consent freely, without us putting you under any type of pressure;
- you have to know what you are consenting to – so we'll make sure we give you enough information;
- you should have control over which processing activities you consent to and which you don't. We provide these finer controls within our privacy preference centre; and
- you need to take positive and affirmative action in giving us your consent. Where possible we will keep records of the consents that you have given.

As we have mentioned, you have the right to withdraw your consent to these activities. You can do so at any time, and details of how to do so can be found here.

Establishing, Exercising Or Defending Legal Claims

Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity".

This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

How you can get in touch with us:

to access, amend or take back the personal data that you have given to us;
if you suspect any misuse or loss of or unauthorised access to your personal information;
to withdraw your consent to the processing of your personal data (where consent is the legal basis on which we process your personal data);
with any comments or suggestions concerning this Privacy Policy

You can write to us at the following address:

Chapters People Ltd, The Courtyard, 4 Evelyn Road, London, W45JL

Alternatively, you can send an email to: accounts@chapterspeople.co.uk

Delete – while we will endeavour to permanently erase your personal data once it reaches the end of its retention period or where we receive a valid request from you to do so, some of your data may still exist within our systems, for example if it is waiting to be overwritten. For our purposes, this data has been put beyond use, meaning that, while it still exists on an archive system, this cannot be readily accessed by any of our operational systems, processes or Staff.

General Data Protection Regulation (GDPR) – a European Union statutory instrument which aims to harmonise European data protection laws. It has an effective date of 25 May 2018, and any references to it should be construed accordingly to include any national legislation implementing it.