

# Website Privacy Policy (Version 1.1 applicable from ...../...../2019)

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## 1. Introduction

**1.1** The Privacy Policy (the “**Policy**”) set out below will govern the protection and processing of personal data that is collected or submitted, by using the website [www.....com.cy](http://www.....com.cy) (the “**Website**”).

**1.2** The Website is owned and operated by CAST CASTING AGENCY (Julia Constantinou), in Cyprus (“**us**”, “**we**”, “**our**” or “**CCA**”).

**1.3** Please read this Policy carefully. By submitting your acceptance on the relevant notifications posted on the Website, you are deemed to have read, understood, agreed to and consented to processing of your personal data according to the terms of this Policy.

**1.4** This Policy should be read alongside the Website Terms and Conditions of Use found [here](#).

## 1.5 Definitions

“**Website User or User**” means any natural or legal person accessing or otherwise using the Website, including a user who creates a Model Account.

“**Model Account**” means a Website account created by a user for the purpose of creating, maintaining and using a model portfolio on the Website.

## 2. Collection of personal data

**2.1** The Website collects user submitted personal data by registering and maintaining a Model Account. In order to process an application to register a Model Account, we will need to collect the following minimum information regarding the model: name, surname, email address, telephone number, date of birth, gender of the model and also the name, surname and email address of the parent/legal guardian if the model is a child under the age of 18 years old. In such an event the account opening process should be carried out by the parent/legal guardian who will be asked to give consent for the processing of the personal data of the child and who may also be asked to provide documentation showing authorisation to act on behalf of the child.

Upon registering the account, the website shall also collect photographs and videos of the model, uploaded by the website user who has created the account as well as photographs and videos which may be collected by us during Projects with clients, for the purposes of creating and updating the model’s portfolio.

We may contact you from time to time in order to make sure that your data is correct and kept up to date.

## 2.2 Cookies

Cookies are text files containing small amounts of information which are downloaded to your computer or mobile device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie.

If you do not accept the use of cookies please disable them by changing your browser settings so that cookies from our website cannot be placed on your computer or mobile device.

The Website only uses the following Cookies, which collect information in an anonymous form, about how visitors use our site, the number of visitors to the site, where visitors have come to the site from and the pages they visited. This will allow us to collect anonymous information, to compile reports and to help us improve our site.

Cookie name	Source	Expiry	How to block

The use of these cookies by the Website does not involve any kind of processing of personal data.

## 3. Retention period

We will only process the personal data for as long as the Model Account is active. Please keep in mind that we will treat a Model Account deactivation request also as a request to delete all the personal data related to the Model Account.

## 4. Data sharing with potential clients

We will only share a model's photographs and videos with a potential client whose casting criteria matches your Model Account. We will only share further personal data if a casting session is agreed between the model and the client.

## **5. Access to data by third parties**

In order to be able to provide continuous service to website users we work with third party service providers for hosting the Website and maintaining the Website and its content. The provision of these service may necessitate access to systems on which personal data is stored. Our third-party service providers shall only process personal data for the purpose of providing to us their services and are contractually obligated to only process such data for the duration of our service agreement and to ensure that any person who is authorised by the service provider to process your personal data shall be under an obligation of confidentiality.

## **6. Changes to the Policy**

We reserve our right, at our discretion, to make changes to any part of this Policy. Should this Policy be amended, we will publish details of the amendments on the Website and we will post a notice on the Website to request your acceptance of the amended Policy.

## **7. Severability**

If this Policy or any part of it is found to be illegal, invalid or otherwise unenforceable under the laws of any country in which this Policy is intended to be effective, then to the extent that it is determined to be illegal, invalid or unenforceable, it shall in that country be treated as severed and deleted from this Policy and the remaining terms of this Policy shall survive and remain in full force and effect and continue to be binding and enforceable in that country.

## **8. Events beyond our control**

We will not be responsible for any breach of this Policy caused by circumstances beyond our reasonable control.

## **9. The rights of Website Users who submit personal data through the website**

**9.1** If you submit or have already submitted to us, personal data about you or about a child for which you are acting a parent/legal guardian, through the Website, then you have the following rights under this Policy and the relevant legislation on the protection on personal data.

- You may at any time withdraw the consent you have given us to process the personal data.

- You have a right to lodge a complaint with the supervisory authority, The Office of the Commissioner for the protection of personal data, however we would appreciate the chance to deal with your concerns before you approach the supervisory authority.
- You may at any time send us any of the following requests:
  - A request for us to permanently delete all or some of the personal data from our records.
  - A request for you to access the personal data which are in our records and a request for us to provide you with a copy of your personal data which are in our records, in digital or hard copy form.
  - A request for us to update or correct the personal data which are in our records.
  - A request for us to forward to another party of your choosing, a copy of all or some of the personal data that are in our records.
  - A request for us to limit what we do with the personal data or to stop all processing of your personal data.

**9.2** If you wish to exercise any of the above rights you will be able to do so by contacting us at any of the following:

**Address:** [REDACTED], Cyprus

**Tel:** +357 [REDACTED]

**Fax:** +357 [REDACTED]

**Email:** [REDACTED]

**9.3** Please keep in mind that if you withdraw your consent, or if you make a request for us to permanently delete all personal data from our records, or if you make a request for us to stop all processing of the personal data, or if you make a request for us to limit what we do with the personal data, in a way that we are no longer in a position to effectively facilitate the Model Account, then we will treat such a request as a request to deactivate the Model Account and delete all information related to the account (personal and non-personal data). Before doing so, we will notify you in order to give you an opportunity to request a copy of the information before deactivating the account and before deleting all information.

**10. The supervisory authority in Cyprus for the enforcement of personal data protection legislation is:**

The Office of the Commissioner for the protection of personal data

**Address:** Iasonos 1, 1082 Nicosia Cyprus or P.O.Box 23378, 1682 Nicosia Cyprus

**Telephone:** +35722818456

**Fax:** +35722304565

**Email:** [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)