

Tess Management Privacy Policy

Tess Management, a company incorporated and registered in England and Wales with company number 4818565 and whose registered office is at Charles House, 5-11 Regent Street, St James's, London SW1Y 4LR ("we" or "us") places great importance on visitor privacy and the security of all guests visiting this website (the "website").

When you interact with us through our website (or otherwise) you may provide, or we may collect, certain information from which you is personally identifiable (which is referred to as personal data). For the purposes of the General Data Protection Regulation or "GDPR" (and all other laws relating to the use your personal data), we are the "data controller", meaning that we are responsible for deciding how your personal data is used and more importantly, for keeping your data safe and only using it for legitimate reasons.

This privacy policy ("policy") describes how we work to protect your personal data and maintain your trust. This policy may be supplemented from time to time by a specific privacy notice that we may provide to you if, for example, you sign up as a model.

INFORMATION WE COLLECT

We collect information about you in two ways.

First, we collect personal information provided to us directly by you, such as when you apply via our website to become a model; place a booking; e-mail us; or request information from us. This information includes:

- **Identity** - first name, surname, date of birth, gender, country of residence
- **Contact** - email address, telephone numbers and address
- **Profile** – your preferences for marketing and feedback

Second, we automatically receive information from your browser, including but not limited to your internet protocol (IP) address, information about your browser, "cookie" and "web beacon" or "web bug" information.

The table below sets out how we use your personal data and our lawful basis for doing so. We may process your personal data for more than one lawful basis depending on the specific purpose for which we are using it. Importantly, we will only use your personal data when the law allows us to.

Reason why we use the data	What data	Legal ground for using the data
Provide you with news about Tess Management.	Identity, Contact, Profile	Performance of a contract with you Necessary for our legitimate interests (to develop our business, including our products and services and to increase the profile of Tess Management) Consent
For internal administration and record keeping purposes	All	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (for effective business administration and service provision)
Notify you of changes to our policy, our website terms and conditions or other changes to our services.	Identity, Contact	Performance of a contract with you Necessary to comply with a legal obligation

Answer your enquiries which may involve contacting you by post, e-mail or phone	Identity, Contact	Performance of a contract with you Necessary for our legitimate interests (to ensure our customers are informed and satisfied with our services)
Improve and personalise your experience of our website by delivering more relevant content whilst you browse	Identity, Contact, Profile, Cookies (see below)	Necessary for our legitimate interests (to develop our business, improve our website and overall user experience and inform our marketing strategy) Consent
Administer our website, including website trouble shooting, testing and analysis and to enable you to participate in interactive features of our website	Identity, Contact, Profile, Cookies (see below)	Performance of a contract with you Necessary for our legitimate interests (to ensure that our website is fully functional and operating in the most effective way for you)
Give you the opportunity to provide us with feedback through reviews and surveys	Identity, Contact, Profile	Necessary for our legitimate interests (to develop our business, promote new products and services, obtain feedback and to improve our services)

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 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.

Aggregated data may be derived from your personal data but is not considered personal data in law as this data does 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 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 policy.

COOKIES

We use tracking technologies, including cookies, on our website. A cookie is a very small file sent to your web browser by a website's server to process information more efficiently and allow the server to uniquely identify the browser on each page.

Cookies and other similar technologies distinguish you from other users of our website and may: 1) be fundamental to the running of our website; 2) help our website to perform effectively; 3) enable us to understand our customers' browsing behaviour; and/or 4) allow us to improve our website. We use the following categories of cookies on our website:

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. This includes Google Analytics (which you can find more information about [here](#)).

Importantly, we will not use any cookies or similar technologies (or permit any third parties to place these on our website) which are not strictly necessary for the operation of our website, without first getting your consent.

You can manage your settings and block cookies/tracking technologies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including strictly necessary cookies) you may not be able to access all or parts of our website.

INFORMATION SHARING AND DISCLOSURE

We may disclose your personal information to any member of our group of companies, which means our subsidiaries, our ultimate holding company and its subsidiaries.

We may disclose your information to third parties including:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with you; and
- analytics and search engine providers that assist us in the improvement and optimisation of our website.

under the following circumstances:

- where, in order for us to provide our products and services to you, we may need to appoint other organizations to carry out some of the processing activities on our behalf. These will include, for example, delivery organizations and mailing houses. In these circumstances, we will take all steps reasonably necessary to endeavour that your information will be used in a manner consistent with this policy;
- if we are required to do so by law or pursuant to a binding regulatory request (in such circumstances, such disclosure will at all times be solely to the extent required by law or the applicable regulatory request);
- where it is necessary to share information in order to investigate, prevent or take action regarding illegal activities, suspected fraud, potential threats, violations of our website terms and conditions, or as otherwise required by law; or
- in connection with the sale, merger, joint venture, acquisition, or reorganization of us or any of our subsidiaries or parent companies and their respective assets, where we may have to disclose your information to our new business partners or owners.

USE OF YOUR INFORMATION OUTSIDE THE EUROPEAN ECONOMIC AREA ("EEA")

The European Economic Area or "EEA" is deemed to have good standards when it comes to data privacy. As such, we consciously limit the occasions when we may need to transfer or handle your data outside of the EEA. Where we do, for example where our service providers are based outside of the EEA, we make sure that your data is still treated fairly and lawfully in all respects (including making sure we have a legal ground for sending your data outside the EEA and putting in place all necessary safeguards for such arrangement).

Where relevant, you will have the right to see a copy of any safeguards we put in place for international transfers of your data. Just get in touch with us if you would like to find out more

SECURITY AND DATA RETENTION

We endeavour to protect personal information under our control in order to prevent the loss, misuse, unauthorized access, disclosure or alteration of your information.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will take reasonable steps to protect your personal data, we cannot guarantee the security of your data transmitted to

our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We will retain your personal data only for as long as is strictly necessary for the purposes for which such data was originally collected (or for such longer period as may be required by law). In some circumstances we may 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.

LINKS TO OTHER WEBSITES

Our website may contain links to other websites that are owned and operated by third parties. Even if the third party is affiliated with us, we have no control over these linked websites, all of which have separate privacy and data collection practices. Please be aware that we cannot guarantee or be responsible for the data collection practices of such other websites. We encourage you to read the privacy statements for those linked websites.

YOUR RIGHTS

In certain situations, you are entitled to:

- access a copy of your personal data;
- correct or update your personal data, which you can do yourself by logging into your account or if you would prefer, please contact us and we can help you out;
- erase your personal data;
- object to the processing of your personal data where we are relying on a legitimate interest (as set out in the above table);
- restrict the processing of your personal data;
- request the transfer of your personal data to a third party; or
- where you have provided your consent to certain of our processing activities you may withdraw your consent at any time (but please note that we may continue to process such personal data if we have legitimate legal grounds for doing so).

If you want to exercise any of these rights, please contact us at the address in this policy. You don't have to pay a fee to exercise your rights, unless your request is clearly unfounded, repetitive or excessive (in which case we can charge a reasonable fee). Alternatively, we may refuse to comply with your request in these circumstances. Where your request is legitimate, we will always respond within one month (unless there is a legal reason to take longer, such as where your request is particularly complex). We may also need you to confirm your identity before we proceed with your request if it is not clear to us who is making the request.

In addition to the above, you may get in touch with the ICO (Information Commissioner's Office) if you are concerned about the way in which we are handling your personal data. However, where possible, we would really appreciate you speaking with us first if you have any concerns.

THIRD PARTY WEBSITES

This policy only applies to data collected on our website and does not apply to websites of affiliated companies. We reserve the right to modify this policy at any time without notice. Any changes to our Policy in the future will be posted on our website and, where appropriate, notified to you by e-mail. You are responsible for regularly reviewing this policy for any updates and/or changes to this policy.

YOUR CHOICE

You may choose to stop receiving communications from us at any time. To do this, to access your personal information or to ask us to remove your personal information from our database, please send a message with your request to the policy manager at INFO@TESSMANAGEMENT.COM.

CHANGES TO OUR POLICY

We will occasionally update this policy and we encourage you to periodically review this policy to be informed of how we use your information.

QUESTIONS AND CONTACTING US

If you have any comments, questions or suggestions relating to our use of your information, the information collected or your use of our website please contact the policy manager at INFO@TESSMANAGEMENT.COM.