

KARMA LIMITED
Data Processing & Privacy Policy
Last updated: 10 May 2018

The Karma Group of Companies (including its subsidiary and associated companies) (together referred to as "Karma") is committed to protecting and respecting your privacy.

For the purpose of the Data Protection Act 1998 and subsequent data protection legislation (the "Act") the data controller is Karma Limited of Richmond Lodge, Twickenham Studios, The Barons, St. Margarets, Middlesex, TW1 2AW.

THE POLICY

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be treated. This includes what we do with it; who we disclose it to; and what controls you have.

The General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR") is a new regulation which replaces the Data Protection Regulation (Directive 95/46/EC). The objective of the Regulation is to harmonise data protection legislation across European Union ("EU") member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Even though the United Kingdom ("UK") has expressed its intention to leave the EU during the course of 2019, the GDPR will be applicable in the UK from 25 May 2018. The UK Government intends for the GDPR to continue in UK law post the point in time which the UK exits the EU and has also introduced a Data Protection Bill to replace the current Data Protection Act in due course to align the UK with the EU data protection framework.

Your new rights under the GDPR are set out in this policy but will only apply once the GDPR becomes law on 25 May 2018.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Please read this privacy policy carefully. Where you provide us with your personal information in person, by e-mail, through our websites or via any other method (including via LinkedIn and other professional networking sites), you consent to the collection and use of this information by Karma in accordance with this privacy policy. If you have any specific queries relating to this privacy policy in, please contact the Privacy Officer (listed below).

WHO WE ARE

We are a full service multi platform video production business (the "Business"). We collect the personal data of the following types of people to allow us to undertake our business:-

- (a) prospective business opportunities with potential and actual clients;
- (b) prospective and live client contacts;
- (c) employees; and,
- (d) supplier contacts to support our services and the Business.

We collect information about you to carry out the Business and ancillary activities.

THE INFORMATION WE USE & WHERE WE COLLECT IT FROM

This is information about you that you give us by filling in forms on our site www.karma.co.uk or applications that we utilise in the course of the Business (together referred to as the "Site") or by corresponding with us by telephone, e-mail or otherwise. It includes information you provide when you register to use our site, or e-mail to enter our database, subscribe to our services or other social media functions on our site, enter a survey, and when you report a problem with the Site.

The information you give us or we collect about you may include your name, address, private and corporate e-mail address and phone number, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business FaceBook or corporate website

COLLECTION OF INFORMATION FROM THE SITE

We may collect information about your computer including where available your IP address, operating system and browser type for system administration and to analyse visitor trends and traffic on our website. This information is collected in aggregate form and does not identify individuals. It is not passed on to third parties.

Given that the Internet is a global environment, using the Internet to collect and process personal data necessarily involves the transmission of data on an international basis. Therefore, by browsing the Site and communicating electronically with us, you acknowledge and agree to our processing of personal data in this way. There are inherent risks in transmitting information across the Internet. Karma cannot guarantee that the personal information you submit will not be intercepted by others when it is submitted to us over the Internet.

COOKIES

We use analytics software to better understand how our clients and potential customers navigate to and through the Site. These analytics also help us to:-

- (a) track the effectiveness of the money we spend on our digital marketing campaigns;
- (b) track the age range, gender, affinity categories, in-market segments (such as product purchase interests) and other related categories; or,
- (c) reach people who have visited the website through remarketing with such analytics. This may include Google and other third party vendors showing advertisements on sites across the Internet.

To opt out of Google's use of cookies visit Google's Ads Settings or the Network Advertising Initiative opt-out page at <http://www.networkadvertising.org/understanding-online-advertising/what-are-my-options/>.

Additionally we may monitor the kind of browser you are currently using, the content that you view, the duration of each visit, and the journey you take through the Site.

In all of the above we do not know who you are as an individual unless you choose to:-

- (a) contact us through our online form;
- (b) log-in as an existing client; or,
- (c) utilise one of our services.

In each of the above circumstances we may use your personal information either directly or indirectly, but only in relation to services we offer.

If you want to delete or configure your computer to reject any cookies from your computer to prevent us from gaining some information please refer to the instructions for your file manager information on deleting or controlling cookies is also available at www.aboutcookies.org. Please note that by deleting cookies or disabling future cookies you may not be able to access some features of our website.

INFORMATION WE OBTAIN FROM OTHER SOURCES

This is information we obtain about you from other sources such as LinkedIn, corporate websites and personal recommendations. Once the GDPR is in force we will inform you, by drawing your attention to this privacy policy, within a maximum of 30 (thirty) days of collecting the data of the fact we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data.

We are working closely with third parties including (but not limited to) companies within our Group, business partners, sub-contractors in technical, professional, payment and other

services, advertising networks, analytics providers, search information providers, credit reference agencies and professional advisors. We may receive information about you from them for the purposes of the Business and ancillary support services.

COLLECTING SENSITIVE INFORMATION

Depending on the nature of our relationship and the basis of our interaction in the Business, we may need to collect and process sensitive personal information about you, some of which may be categorised as Special Data under the GDPR. This may include details of any disability, details of any offences you have committed or are alleged to have committed and whether you are a member of any professional or trade associations. You may refuse to provide any of the sensitive personal information we request, however, this may effect our ability to provides services to you.

In addition, as part of our commitment to equality of opportunity and to monitor compliance with our equal opportunity policy, we may ask you to complete an equality monitoring form. Where you are asked to complete an equality monitoring form, information is provided voluntarily and on an anonymous basis for statistical analysis. It is not stored with your data records.

PURPOSES OF THE PROCESSING & THE LEGAL BASIS FOR THE PROCESSING

We use information held about you in the following ways:-

We collect your personal information so that we can provide our services to you, including to:-

- (a) provide the services to you;
- (b) maintain our business relationship, where you are a user of our website or our services;
- (c) inform you of events, services and possible opportunities arising in the usual course of the Business using contact details you have provided;
- (d) analyse visitor trends and traffic on the Site – this information does not identify you individually;
- (e) assist in managing our relationship with you and our clients and perform administration or operational functions;
- (f) to provide you with information about other services we offer that are similar to those that you have already engaged, been provided with or enquired about; or,
- (g) carry out market research, marketing analysis and satisfaction surveys.

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into a production agreement or arrangements with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on to you to fulfil our legal obligation. For example, we have a statutory obligation to retain employee data and data relating to the Business, including details of taxation payments for at least 6 (six) years.

We will in some circumstances rely on consent for particular uses of your data and you will be asked for your express consent, if legally required.

OUR LEGITIMATE BUSINESS INTERESTS

Our legitimate interests in collecting and retaining your personal data is described below:-

As a production company it is necessary for us to communicate with third parties regarding the Business and the provision of services. The exchange of personal data of our employees and contractors and our client contacts is a fundamental, essential part of this process. To support the Business we require a database of candidate and client personal data.

To maintain, expand and develop the Business we need to record the personal data of clients, contractors, and prospective contractors and client contacts.

CONSENT

In the event that we require or need to rely on consent to lawfully process your data we will request your consent orally, by e-mail or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

OTHER USES

We may also use your data to:-

- (a) notify you about changes to the Business or our services;
- (b) ensure that content from the Site is presented in the most effective manner for you and for your computer and any subsequent or consequent improvements resulting from such overview and as part of our efforts to keep our site safe and secure. We may use this information to administer the Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- (c) measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; or
- (d) make suggestions and recommendations to you and other users of the Site about goods or services that may interest you or them.

We do not undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision making process.

COLLECTION OF YOUR PERSONAL INFORMATION

Personal information may be obtained through the Site or via one of our business development personnel when you contact them, send them information regarding a specific or general enquiry, connect with them on LinkedIn or similar professional networking sites, or discuss an opportunity with them.

Although we do not make it compulsory to give us every item of information we ask for, the more information you volunteer (and the more accurate it is), the better we can tailor our services to your needs. If the personal information we have requested is not collected, we may not be able to provide the services to you.

With your permission we may take a photograph of your passport or other identity document as part of legally required Identity checks. These images will be uploaded to our database and will then be deleted from any mobile photo device.

DISCLOSURE OF YOUR PERSONAL INFORMATION

In the course of the Business we may need to disclose your personal information to other companies (including to trusted third parties) for the purposes for which it is primarily held or for a related or secondary purpose.

We may:-

- (a) disclose or transfer your personal information to prospective clients or interested third parties in the usual course of the Business and have given express permission that we may disclose it;
- (b) disclose your personal information to third parties who perform functions on our behalf and who also provide services to us;
- (c) in the event of a sale, merger, liquidation, receivership or transfer of assets disclose your personal information to interested third parties provided that they agree only to use your personal information for the purposes that you have provided it to us;
- (d) disclose aggregate statistics about the Site visitors in order to describe our services to prospective partners, clients and other reputable third parties and for other lawful

purposes – in such cases these statistics will include no personally identifying information.

We may disclose personal information, if required to do so by law, a court order or by a regulatory authority of competent jurisdiction or if we believe that such action is necessary to protect, defend or enforce the rights of Karma and the Business.

TRANSFERRING INFORMATION OVERSEAS

Where we provide services to clients based outside of the UK, your personal information may be sent to clients in that country. By submitting your personal information to us, you are agreeing to your personal details being transferred to those countries.

THE LAWFUL BASIS FOR A THIRD PARTY PROCESSING DATA WILL INCLUDE:-

- (a) their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs;
- (b) satisfaction of their contractual obligations to us as our data processor;
- (c) for the purpose of a contract in place or in contemplation;
- (d) to fulfil their legal obligations.

SECURITY & STORAGE OF DATA

Safeguarding personal information and respecting confidentiality of your information is important to Karma. All information you provide to us is stored on secure servers in the UK, and we will take the necessary steps, including putting in place adequate technical and organisational measures, to protect your personal information. While we have security measures in place to protect against the loss, misuse and alteration of personal information under our control we cannot guarantee that loss, misuse or alteration of personal information will not occur.

RETENTION OF DATA

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so. Accordingly, we have a data retention policy which we keep under review. We retain your details on our system indefinitely.

KEEPING OUR RECORDS ACCURATE & UP TO DATE

Karma reviews, on a frequent basis, the personal information it processes to ensure that it is up to date, accurate and not held for longer than necessary for our internal processes or as otherwise required by law. Your co-operation in helping us to keep your personal information accurate by informing us of any change of name, change of address or change of other contact details is an important part of this. If you would like to review or change the details you have supplied us with, you may do so at any time by notifying us in writing.

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system. We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes and

we will collect express consent from you if legally required prior to using your personal data for marketing purposes.

You can exercise the right to prevent such processing at any time by contacting us at privacy@karma.co.uk.

If you would like to opt-out of receiving newsletters and updates from us at any time, please use the “unsubscribe” option included in the e-mail or communication concerned.

The Site may, from time-to-time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

FOLLOWING IN THE GDPR COMING INTO FORCE

You will have the following, additional rights:-

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party, subject to certain conditions.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact privacy@karma.co.uk.

The right to make a complaint to a supervisory body which in the UK is the Information Commissioner’s Office. The ICO can be contacted through the following link: <https://ico.org.uk/concerns/>

ACCESS TO INFORMATION

The Act and the GDPR gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act and the GDPR once it is in force. A subject access request should be submitted to the relevant Privacy Officer. We may refuse access if it would interfere with the privacy rights of other persons or if it breaches any confidentiality that attaches to that information.

Under the Act, you have a right to ask us to provide you with details of any of the information we may hold about you and if requested we have to provide you with a readable copy of all personal data which we may hold within 40 (forty) days of receiving your written request for us to provide it. You should write to us at: F.A.O. Privacy Officer, Karma Limited, Twickenham Studios, The Barons, St. Margarets, TW1 2AW, United Kingdom, or by using our online contact us form. The Act and GDPR allows us to make a nominal administrative charge of £10 for providing this information. Evidence or proof of your identity will also be required.

You also have the right to ask Karma to stop using your information. However, if this involves a request for deletion of your file, please be aware that we may not be required or able to do so, particularly where your file also holds information about our clients or financial information that we need to keep for periods of up to 6 (six) years i.e. that relate to tax matters. Where we are unable to comply with your request we will provide reasons.

PRIVACY POLICY AMENDMENTS

Karma may change this privacy policy from time-to-time. If we change our privacy policy, we will post the changes on the Site. The date of issue will be indicated. We recommend that you check the terms of this privacy policy periodically to keep up to date with any changes.

COMPLAINTS

If you believe that we have breached this policy, or any other applicable privacy or data protection laws or regulations which may apply to Karma, then you should make a complaint direct to Karma in the first instance. You should address your complaint in writing to the Privacy Officer (contact details are set out below) and you should include as much detail as you can about the personal information affected, and the circumstances that you believe amount to a breach of this policy or the applicable privacy or data protection law or regulation.

We will undertake an internal investigation, and we may contact you if we need to obtain any further information in relation to your complaint. We will generally provide a written response to your complaint within 40 (forty) days. Our response will set out the results of our investigation, including whether we agree that Karma has breached this privacy policy or applicable privacy or data protection laws or regulations. If you are unhappy with our response to your complaint, you have the right to make a complaint to the relevant regulatory body or privacy or data commissioner (as applicable) in your jurisdiction.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Privacy Officer at privacy@karma.co.uk.