

Privacy Policy

Effective as of July 25, 2018

1. General Terms

This section explains general terms and conditions related to your privacy, responsible entities and persons (a data controller) as well as disclaimers and notices regarding your acceptance of this Policy.

- 1.1. Talents List Inc. and its subsidiaries and affiliates (“**we**”, “**our**” or “**us**”) believe that your privacy is important. Protecting your private information is our priority. We encourage both Clients and Talents (“**Users**”, “**you**”) to read this Privacy Policy (“**Policy**”) carefully when using our Website (talentslist.com), App or transacting business with us. By using our Website, App, or other online services (“**Services**”), you are accepting the practices described in this Policy.
- 1.2. This Policy, jointly with the Terms of Use for our Services, available here: [Terms of Use](#), forms one agreement (“**Agreement**”). All terms which are capitalized in this Agreement shall have the meaning specified in Section 1 of the Terms of Use, if not explicitly specified by this Policy. Therefore, please review this Policy carefully. If you do not agree with any of its terms, or terms of the Agreement, please do not use our Services and/or request the deletion of your personal information from our records.
- 1.3. This Privacy Policy describes the information we collect, how that information may be used, with whom it may be shared, and your choices about such uses and disclosures.

- 1.4. The entity that is a data controller under this Policy is Talents List:

Talents List Inc.

16192 Coastal Hwy, Lewes, DE 19958, USA

info@talentslist.com

Registration number: 6507111

- 1.5. A responsible person in Talents List for matters relating to the collection, storage, and processing of Personal Data is the administrator. In case of any questions, suggestions, or requests regarding Personal Data, please contact the administrator by e-mail info@talentslist.com.
- 1.6. **By clicking the “I agree to the Privacy Policy” button during the registration procedure on our Website or in our App, you confirm that you agree to this Policy and consent to the data practices described in this Policy.**
- 1.7. We use cookies on our Website. Insofar as those cookies are not strictly necessary for the provision of Services to you, we will ask you to consent to our use of cookies when you first visit our Website. Please see more on our cookies collection policy below.

2. Information we collect from you

This section specifies general categories of Personal Data that we may process and why we process it, including a legal basis for such processing.

- 2.1. We may collect personally identifiable information, such as:

- First and Last Name
- E-mail Address
- Country/City

- 2.2. We may also collect anonymous demographic information, which is not unique to you,

such as your:

- Age
- Gender

- 2.3. We also have a feature in our Services to connect your account (or sign in) to your Facebook account and/or LinkedIn account and/or Google account to simplify a registration procedure. If you do so, you authorize us to access certain account information, such as your public profile (consistent with your privacy settings in Facebook/LinkedIn/Google account), your email address, gender, birthday, education history, employment history, current city, photos, personal description, friend list. **By connecting your Talents List account to your third-party account, you acknowledge, and you agree that you are consenting to the continuous release of information about you to others. If you do not want information about you, including personally identifiable information, to be shared in this manner, please do not use this feature.**
- 2.4. This information you actively provide to us during the registration procedure and through your Profile, we do not collect any personal information about you unless you voluntarily provide it to us. Please note that if you directly disclose personally identifiable information or personally sensitive data through Service's public pages (such as part of your personal Profile that is exposed for other Users), this information may be collected and used by others.
- 2.5. Both of these types of information, specified in paragraphs 2.1 and 2.2, may be used separately or collectively to identify you, therefore are considered a personal information about you ("**Personal Data**"). **We collect Personal Data** to determine the actual identity of, and contact, a specific living person and to prevent fraud and abuse of Services. **We process Personal Data to ensure** that Clients and Talents may know each other via our Services, identify each other in real life as well as to build trust between our Users when it comes to payment for booking and working at events. **We also process Personal Data to ensure** that Clients find a perfect match for their event (i.e. if a Client needs to find a male or a female model for their gig, or someone who is of a young age to perform). **The legal basis for this processing** is your consent by means, specified above.
- 2.6. We may process data about your use of our Services ("**Usage Data**"). The Usage Data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the Usage Data is Google Analytics and Inspectlet (our analytics tracking systems). You may find out more about how these services use information from sites or apps that use them by clicking [here](#) (for Google) and [here](#) (for Inspectlet). **This Usage Data may be processed** for the purposes of analyzing the use of our Services. **The legal basis for this processing** is our legitimate interests in monitoring and improving our Services.

3. External sources

This section specifies ways of providing your Personal Data to others.

- 3.1. We do not sell, rent, or lease Personal Data and our customer lists to third parties.
- 3.2. Financial transactions relating to our Services (such as payments for bookings) are handled by PayPal. We do not receive any identifiable information from them, except for transaction identification number (Transaction ID) which cannot be tracked back to you.

However, we may share some Personal data with PayPal only to the extent necessary for processing and refunding payments. Please check PayPal Privacy Policy [here](#) to find out more about their data practices.

- 3.3. We may disclose your Personal Data to our subsidiaries insofar as reasonably necessary for the purposes, and on the legal bases, set out in this Policy. As of now, we do not have other entities except for one company in Delaware.
- 3.4. We will disclose your Personal Data, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on us or Services; (b) protect and defend our rights or property; and, (c) act under exigent circumstances to protect the personal safety of our users, or the public.

4. Protecting your data

This section specifies means we use to secure your Personal Data.

- 4.1. We secure your Personal Data from loss, misuse, unauthorized access, disclosure, alteration, and destruction. We use SSL Protocol for this purpose. When Personal data is transmitted, it is protected through the use of such protocol which encrypts all the data transmitted.
- 4.2. We also ensure that your Personal Data is safe by integrating management solutions (such as training staff), physical solutions (such as using locks and access keys for our employees) and might use other ways to protect your Personal Data.
- 4.3. Although, we take reasonable measures to do so, please remember that no transmission of data over the internet or any wireless network can be guaranteed to be 100% secure. As a result, we cannot ensure or warrant fully the security of any information that you transmit to us or from us, and you do so at your own risk. Therefore, while we strive to protect your Personal Data, you acknowledge that there are security and privacy limitations inherent to the internet which are beyond our control.

5. Children

This section specifies our approach to processing Personal Data of persons who have not reached a legal age.

- 5.1. Our Services are intended for general audiences; therefore, we do not knowingly collect or use any personally identifiable information from children under the age of eighteen. To prevent this, our Services are set to check your age and will not allow to register if you are under 18. In case we learn that you are under 18 and registered a Profile with us, we will remove your Personal Data from our records.
- 5.2. If you are a parent of a child under the age of 18 and you believe some of your child's personal information was collected by us, please send us an inquiry at info@talentslist.com and we will delete Personal Data from our systems.

6. Collecting cookies

This section specifies what cookies are, why they are used, and how we use them.

- 6.1. When you use our Services, we may use cookies and other tracking technologies (collectively, "**Cookies**") to recognize you as a User.
- 6.2. One of the primary purposes of Cookies is to provide a convenience feature to save you time. Cookies are used to customize your online experiences, the Services you use, and

other online content and advertising; measure the effectiveness of promotions and perform analytics; and to mitigate risk, prevent potential fraud, and promote trust and safety across our Services.

- 6.3. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.
- 6.4. Certain aspects and features of our Services are only available through the use of Cookies, so if you choose to disable or decline Cookies, your use of Services may be limited or not possible.
- 6.5. Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not respond to DNT signals.

7. E-mail communications from us

This section specifies how we send you e-mail communications and how you can opt-out.

- 7.1. From time to time, we may contact you via email for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication.
- 7.2. In order to improve our Services, we may receive a notification when you open an email from us or click on a link therein. We use Mandrill plug-in (Mailchimp) to send you those communications via email, therefore we may disclose some information about you (such as your name and your email address). Please review their Privacy Policy [here](#) to understand how they might use your Personal Data.
- 7.3. If you would like to stop receiving marketing or promotional communications via email from us, you may opt-out of such communications by clicking on the “Unsubscribe” button at the bottom of an email sent from us.

8. Retaining, deleting your Personal Data and your rights

This section specifies for how long your Personal Data is retained, reasons for deletion and your rights regarding your Personal Data.

- 8.1. Your Personal Data will not be stored for longer than is necessary for purposes, described in this Policy.
- 8.2. Once your Profile with us is terminated, we will remove your Personal Data from our systems.
- 8.3. If we can specify the period for which your Personal Data will be retained, we will retain it for no longer than 2 years of your inactivity on the Website or in the App or other Services, unless you have instructed us to delete your Personal Data from our systems. We retain your Personal Data for such period in case you want to return back to us and reopen your Profile as well as to monitor and improve our services, using information about the number of Users and other information such as demographics.
- 8.4. If we cannot specify the period for which your Personal Data will be retained (for instance, if such Personal Data is necessary for compliance with certain legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person), we will do our best to retain your Personal Data for as short

period of time as possible and will delete it from our systems immediately after such Personal Data is no longer required for the purpose, for which it was required.

- 8.5. You have the following principal rights under the relevant privacy laws: the right to access, the right to erasure, the right to rectification, the right to restrict and/or object to processing, the right to data portability, the right to complain to a supervisory authority, and the right to withdraw consent. Please review the relevant legislation and regulatory authorities' instructions to understand what these rights are about.
- 8.6. You have the ability to review and update your Personal Data within the Service by opening your Profile and going to settings. Applicable privacy laws may allow you the **right to access, delete, and/or request the correction of errors or omissions in your Personal Data** that is in our custody or under our control.
- 8.7. We will respond to requests within the time allowed by all applicable privacy laws and will make every effort to respond as accurately and completely as possible. Any corrections made to Personal Data will be promptly sent to any organization to which it was disclosed, if any.
- 8.8. For security purposes, not all personal information is accessible and amendable by us. If access or corrections cannot be provided, we will notify you or the individual making the request on your behalf within 30 (thirty) days, in writing, of the reasons for the refusal.

9. Changes to this Policy

This section specifies procedures regarding changes to this document.

- 9.1. We reserve the right to change this Policy from time to time. We will notify you about significant changes in the way we treat Personal Data by one of the following methods: a) sending a notice to the primary email address specified in your Profile; b) placing a prominent notice on our Website or in our App; and/or c) updating any privacy information on this page (in this window).
- 9.2. Your continued use of Services after such modifications will constitute your acknowledgement of the modified Privacy Policy and agreement to abide and be bound by that Policy.
- 9.3. Please check this page from time to time to ensure that you agree to this Policy and any changes to it.

10. Questions

- 10.1. We take reasonable measures to store only accurate, up to date, complete, relevant and not misleading information about you. We accept any inquiries from you related to this Policy. We also welcome your questions or comments regarding this Policy.
- 10.2. Contact us:
Email: info@talentslist.com