

PRIVACY POLICY for Connect Entertainment Pty Ltd

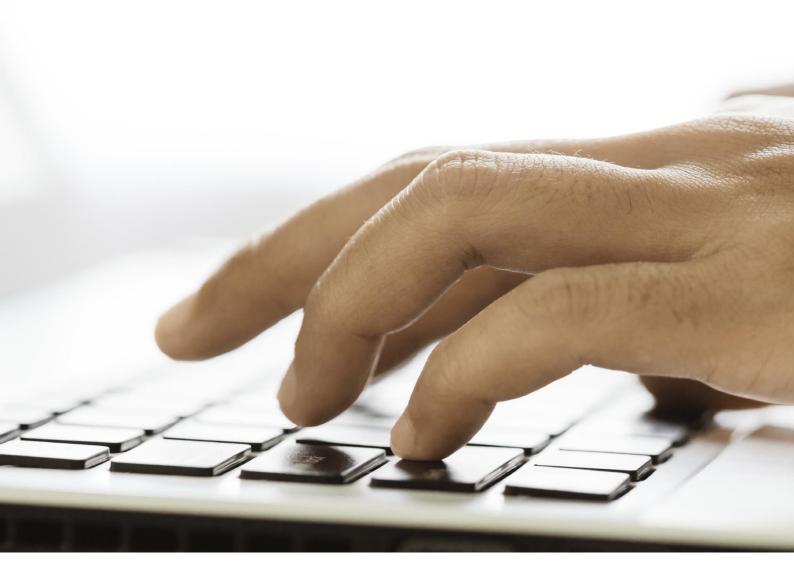




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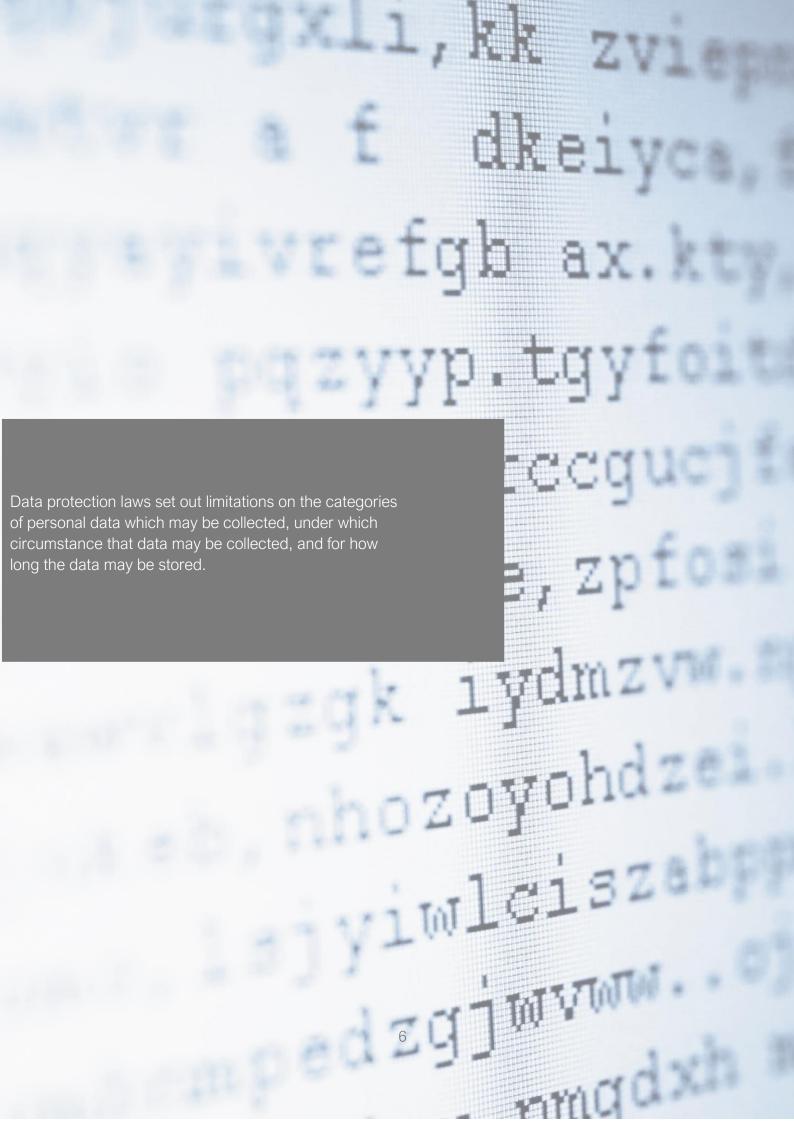
Data Protection Compliance Statement

This document demonstrates our commitment to protecting the privacy and security of your personal information. It contains information regarding how we collect and use personal data or personal information about you in accordance with the General Data Protection Regulation (GDPR) and all other data protection legislation currently in force.

Pursuant to that legislation, when processing data we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper for the course of your engagement/association with us and in ways that have been explained to you
- only use it in the way that we have told you about
- ensure it is correct and up to date
- keep your data for only as long as we need it
- process it in a way that ensures it will not be lost or destroyed or used for anything that you are not aware of or have consented to (as appropriate)

This data protection compliance statement (privacy notice) applies to current and former contacts.



Executive Summary

- Data protection laws set out limitations on the categories of personal data which may be collected, under which circumstances that data may be collected, and for how long the data may be stored.
- Proposed acts of collection (such as collection of employee or customer personal data, purchase
 of customer data for marketing purposes, and collection of personal data through websites) must
 be analysed closely to ensure they would not result in violation of data protection laws.
- The need for proportionality and transparency is key, and individuals must be informed of Connect Entertainment's (Connect Auditions') processing of their personal data.
- Personal data may only be disclosed to third parties when a legitimate basis for doing so has been established.
- Violations can result in damage claims, monetary penalties or imprisonment as well as, administrative sanctions imposed by the supervisory authority.

Data Collection

"Personal data" is any information, which, directly or indirectly, relates to an identified or identifiable natural person. Personal data may only be collected for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes. Unless a legitimate purpose can be established in accordance with national law, personal data may not be collected. There are "special categories" of sensitive personal data, meaning data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sex life or sexual orientation, genetic data and biometric data which require a higher level of protection.

"Processing of personal data" is any operation or set of operations which is performed upon personal data, whether or not by automatic means, including but not limited to collection, organisation, storage, adaptation, disclosure, blocking or erasure.

It is only legitimate to process personal data if:

- the individual to whom the personal data relates to has given consent
- the processing is necessary for the performance of a contract to which the individual is party, or in order to take steps at the request of the individual prior to entering into a contract
- the processing is necessary for compliance with a legal obligation to which Connect Entertainment (Connect Auditions) is subject
- the processing is necessary in order to protect the vital interests of the individual
- the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority put on Connect Entertainment (connect Auditions) or in a third party to whom the data are disclosed; or
- the processing is necessary for purposes of a legitimate interest pursued by Connect Entertainment (Connect Auditions) or by the third party or parties to whom the data are disclosed, except where such interest is overridden by the privacy interest of the individual to whom the personal data relates to.

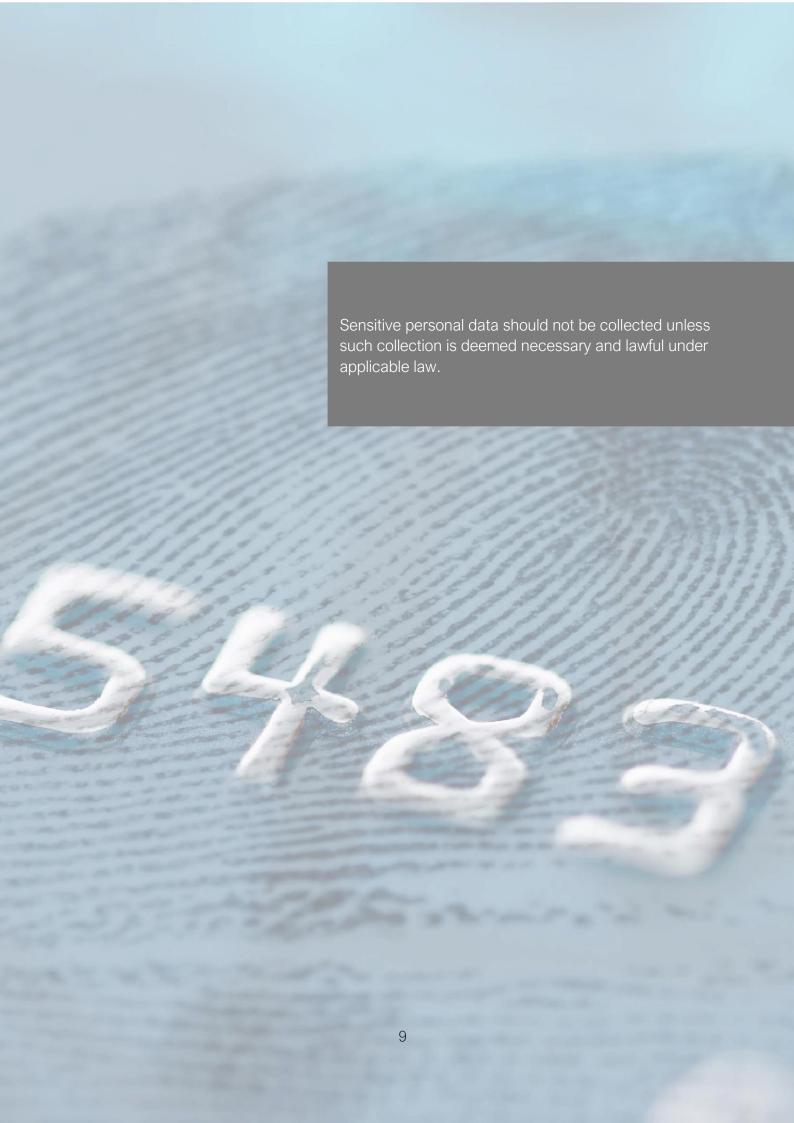
Where required by applicable law or otherwise deemed reasonably practical and appropriate, collection of personal data should be done with the consent of the individual concerned. Consents from individuals whose personal data are being processed should be unambiguous, explicit and possible to revoke by the individual in question.

When collecting personal data, the need for proportionality and transparency should be considered. Accordingly, the personal data collected should be adequate, relevant, and not excessive in relation to the purposes for which the data are collected and/or further processed.

Method of Collection of Personal Information

Your personal information is obtained through your contact with Connect Entertainment (Connect Auditions), this may be in the form of electronic (i.e. email, website interaction, text messaging, social media activity), paper copy form or verbal communication. Further information will be collected directly from you when you complete forms at the start of your engagement or association, for example, your next of kin details or any criminal convictions. Other details may be collected directly from you in the form of official documentation such as your driving license, passport or other right to reside evidence. Data may be collected during the course of your engagement with us to enable its continued existence or development.

Personal data is kept in secure data storage facilities or within our HR and IT systems which include inhouse servers, off-site servers, in-house cloud and third-party cloud.



Sensitive Personal Data and Special Categories of Personal Data

"Sensitive personal data" is personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, health or sex life. Sensitive personal data should not be collected unless such collection is deemed necessary and lawful under applicable law.

Other categories of personal data which do not constitute sensitive personal data, but nevertheless are given particular protection under applicable data protection laws, should be processed in consideration of the need for particular protection.

Examples of such special categories of personal data include, but are not limited to:

- data relating to offences, criminal convictions or security measures, which may be carried out only under the control of official authority
- credit information
- children's personal data; and
- personal identity numbers

COVID-19

Connect Entertainment have an important obligation to maintain a safe workplace for staff and visitors and must handle personal information appropriately. In order to manage the pandemic whilst respecting privacy, we aim to limit the collection, use and disclosure of personal information to what is necessary to prevent and manage COVID-19, and take reasonable steps to keep personal information secure.

- Personal information should be used or disclosed on a 'need to know' basis
- Only the minimum amount of personal information reasonably necessary to prevent or manage COVID-19 should be collected, used or disclosed

Details of Information We Will Hold About You

The list below identifies the kind of data that we will hold about you (where applicable):

- personal contact details such as name, title, addresses, telephone numbers and personal email addresses
- date of birth
- marital status
- bank account details, payroll records and tax codes
- attendance, sickness absence etc
- copy of identification / passport
- information included on applications you may complete
- medical or health information including whether or not you have a disability
- information about your use of our information and communications systems
- References and personal details of referees
- Documents and material you have provided to us (resumes, show reels etc.)
- Previous work history with clients we work with

- Your progress/experience with previous events/projects operated by us
- Personal information relating to your appearance (height, weight, ethnicity, hair colour etc.)
- Details of related parties to you (agent, parents, carer etc.)

The following list identifies the kind of data that that we will process, and which falls within the scope of "special categories" of more sensitive personal information

- information relating to your race or ethnicity
- information about your health, including any medical conditions and disabilities
- information about criminal convictions and offences
- Information regarding your membership or affiliation to a/any union/s.

Lawful Basis for Processing Your Personal Information

We consider that the basis for which we will process the data contained in the list above (see section above - details of information we will hold about you) is necessary for the execution of our engagement with you and to enable us to comply with our legal obligations. Occasionally, we may process personal information about you to pursue legitimate interests of our own or those of third parties, provided there is no good reason to protect your interests and your fundamental rights do not override those interests.

The circumstances in which we will process your personal information are listed below.

- making decisions about who to offer opportunity to
- responding to requests from third parties, such as a reference request
- maintaining comprehensive up to date personnel records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained
- offering a method of recourse for you against decisions made about you via a grievance procedure
- gaining expert medical opinion when making decisions about your fitness for work
- planning and restructuring exercises/campaigns/processes
- dealing with legal claims made against us
- preventing fraud
- ensuring our administrative and IT systems are secure and robust against unauthorised access
- Inspection from authorised outside agencies
- Be able to contact you for late payments, unpaid invoices or debt collection
- Determining your level of potential interest in a project/campaign
- Determine overall growth/change in relevance to the success of a campaign/project

There may be more than one reason to validate the reason for processing your personal information.

Lawful Basis for Processing "Special Categories" of Sensitive Data

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

• <u>Consent</u>: You have given clear consent for us to process your personal data for a specific purpose.

- <u>Contract</u>: The processing is necessary for a contract we have with you, or because we have asked you to take specific steps before entering into a contract.
- <u>Legal Obligation</u>: The processing is necessary for us to comply with the law (not including contractual obligations) and meets the obligations under our data protection policy.
- Vital Interests: the processing is necessary to protect someone's life.
- <u>Public Task</u>: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law and meets the obligations under our data protection policy. (For example, in the case of equal opportunities monitoring)
- <u>Legitimate Interests</u>: the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect your personal data which overrides those legitimate interests (For example to assess your capacity to work on the grounds of ill health)

Occasionally, special categories of data may be processed where you are not capable of giving your consent, where you have already made the information public or in the course of legitimate business activities or legal obligations and in line with the appropriate safeguards.

Examples of the circumstances in which we will process special categories of your particularly sensitive personal information are listed below (this list is not exhaustive):

- in order to protect your health and safety
- to determine if reasonable adjustments are needed or are in place
- to administer benefits
- In order to fulfil equal opportunity monitoring or reporting obligations

Where appropriate, we may seek your written authorisation to process special categories of data. Upon such an occasion we will endeavour to provide full and clear reasons at that time in order for you to make an informed decision. In any situation where consent is sought, please be advised that you are under no contractual obligation to comply with a request. Should you decline to consent you will not suffer a detriment

Information About Criminal Convictions

Information regarding criminal convictions may be processed in accordance with our legal obligations. Occasionally we may process such information to protect yours, or someone else's interests and you are not able to give your consent, or we may process such information in cases where you have already made the information public. Such information may be sought as part of the recruitment process or in the course of your engagement/association with us.

Sharing Data

Your data will be shared with colleagues within the Company where it is necessary for them to undertake their duties. This includes but is not limited to management, administration team members and assistants involved with the particular project you are associated with.

It may be necessary for us to share your personal data with a third-party or third-party service provider (including, but not limited to, contractors, agents or other associated/group companies). Data sharing may arise due to a legal obligation, as part of the performance of a contract or in situations where there is another legitimate interest (including a legitimate interest of a third party) to do so. The list below identifies which activities are carried out by third-parties on our behalf:

- IT services
- legal advisors
- security
- insurance providers
- Victoria/State Police and appropriate background checking agencies
- Recruitment agencies
- Debt Collection Agencies

Data may be shared with third-parties in the following circumstances:

- in the process of regular reporting activities regarding our performance,
- with regards to a business or group reorganisation, sale or restructure,
- in relation to the maintenance support and/or hosting of data
- to adhere with a legal obligation
- in the process of obtaining advice and help in order to adhere with legal obligations
- To chase late payments or unpaid invoices
- Government agencies

If data is shared, we expect third parties to adhere and comply with the GDPR and protect any data of yours that they process. We do not permit any third parties to process personal data for their own reasons. Where they process your data, it is for a specific purpose according to our instructions.

Your Rights in Relation to Your Data

We commit to ensure that any data we process is correct and up to date. It is your obligation to make us aware of any changes to your personal information. In some situations, you may have the:

- Right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice.
- Right to request access. You have the right to access the data that we hold on you. To do so, you should make a subject access request.
- Right to request correction. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it.
- Right to request erasure. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it.
- Right to object to the inclusion of any information. In situations where we are relying on a legitimate interest (or those of a third party) you have the right to object to the way we use your data where we are using it.
- Right to request the restriction of processing. You have the right to ask us to stop the processing of data of your personal information. We will stop processing the data (whilst still holding it) until we have ensured that the data is correct.
- Right to portability. You may transfer the data that we hold on you for your own purposes.
- Right to request the transfer. You have the right to request the transfer of your personal information to another party.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing

your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

Consequences of your failure to provide personal information

If you neglect to provide certain information when requested, it may affect our ability to enter into or continue with an engagement/association with you, and it may prevent us from complying with our legal obligations.

Change of purpose for processing data

We commit to only process your personal information for the purposes for which it was collected, except where we reasonably consider that the reason for processing changes to another reason and that reason is consistent with the original basis for processing. Should we need to process personal information for another reason, we will inform you of this and advise you of the lawful basis upon which we will process the data.

Important note: We may process your personal information without your knowledge or consent, in compliance with the above rules (see above section - lawful basis for processing your personal information).

In the event that you enter into an engagement/association with us, any information already collected may be processed further in accordance with our data protection policy, a copy of which will be provided to you.

Image & Video Capture

Connect Entertainment (Connect Auditions) and its affiliates produces a range of published materials and online information. We often take photographic/video images of subjects in order to enhance and illustrate our materials and make them more motivating and inspiring to our audiences.

For persons under 18 years of age, full parental/guardian consent is required, and Connect Entertainment (Connect Auditions) has an "Image and Video Consent Form" which should be completed. As it is mandatory for Connect Entertainment (Connect Auditions) to obtain permission prior to each photographic/video session, it is necessary for each child to have a copy of this form signed by the parent/guardian prior to the relevant photographic/video session.

Connect Entertainment (Connect Auditions) acknowledges its responsibilities in capturing images by photography or other means under the provisions under the relevant legislation (see list of relevant legislation on last page). Connect Entertainment (Connect Auditions) undertakes to inform all those whose images may be recorded (or their parents/guardians if under 18 years of age) of the purposes for which the images may be used by Connect Entertainment (Connect Auditions).

In this context Connect Entertainment (Connect Auditions) informs all persons taking part in activities that they may be photographed, filmed, videoed or otherwise captured in image form. Where possible and practical to do so, Connect Entertainment (Connect Auditions) seeks written consent to image capture. Where this is not possible for practical reasons, unless express objections are received, individuals attending an event associated with Connect Entertainment (Connect Auditions) are deemed to have given their consent by attending or remaining at the event. Any queries or complaints should be raised with the event host in the first instance.

When required by applicable law or where reasonably practical and appropriate, individuals should be provided with notice of the processing of their personal data. 15

Notice

When required by applicable law or where reasonably practical and appropriate, individuals should be provided with notice of the processing of their personal data. Such notice must, at a minimum, contain the following information:

- the name of the legal entity which alone or jointly with others determines the purposes and means of the processing of personal data (sometimes referred to as the data controller);
- the purposes for which the personal data are intended to be processed;
- any further information which is necessary in order for the individuals to be able to exercise their
 rights in connection with the processing, such as the types of personal data, the recipients or
 categories of recipients of the data, and the nature of any access rights under applicable law.

Access Requests

If an individual makes a request to receive information regarding Connect Entertainment's (Connect Audition's) processing of personal data, to object to the processing of personal data, or to have errors in such personal data corrected, Connect Entertainment (Connect Auditions) should respond in the manner required by applicable law or otherwise deemed reasonably practical and appropriate in consultation with management.



Data Quality, Confidentiality & Security

Processed personal data must be accurate and, to the extent necessary, up to date. Personal data that is inaccurate or incomplete should be erased or corrected.

An employee who has access to personal data must only process the data in accordance with the purpose of the processing, and may not share, distribute, or otherwise disclose the personal data to a third party unless instructed to do so by Connect Entertainment (Connect Auditions).

Appropriate technical and organisational measures should be implemented to protect personal data against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access, and any other unlawful forms of processing. The extent of such measures should be appropriate to the risks represented by the processing, and nature of, the personal data.

As part of our commitment to protecting the security of any data we process, we have put the following measures in place

- Data kept on password protected, in-house and third-party servers
- Data uploaded using encrypted wireless networks
- Access to data granted on a strictly need-to-know basis
- Physical, hard copies of data destroyed if not required for reporting processes

In addition, we have put further security measures in place to avoid data from being accessed, damaged, interfered with, lost, stolen or compromised. In cases of a breach, or suspected breach, of data security you will be informed, as will any appropriate regulator, in accordance with our legal obligations.

Any data that is shared with third parties is restricted to those who have a business need, in accordance with our guidance and in accordance with the duty of confidentiality.

Storaging

Personal data should only be stored for as long as is necessary, considering the purposes for which it was collected and applicable legal storing periods.

We have given consideration to the following in order to decide the appropriate retention period:

- quantity
- nature
- sensitivity
- risk of harm
- purpose for processing
- legal obligations

At the end of the retention period, upon conclusion of any contract we may have with you, or until we are no longer legally required to retain it, it will be reviewed and deleted in a permanent and secure way, unless there is some special reason for keeping it. Occasionally, we may continue to use data without further notice to you. This will only be the case where any such data is anonymised, and you cannot be identified as being associated with that data.



Disclosure

Personal data may only be disclosed to third parties, such as Connect Entertainment's (Connect Audition's) subcontractors, partners and affiliates, when there is a legitimate basis for doing so.

The term "data processor" refers to a legal entity which processes personal data on behalf of the data controller. The term "data controller" refers to a legal entity which alone or jointly with others determines the purposes and means of the processing of personal data.

Marketing Measures and Websites

The use of personal data for marketing measures, such as direct marketing campaigns, marketing through social websites or the purchase of personal data for marketing purposes, must fulfil the requirements of applicable law. Unless a legitimate purpose allowing the collection and use of personal data for marketing purposes can be established, personal data may not be used for these purposes. Individuals are entitled to give notice that they oppose the processing of their personal data for purposes concerning direct marketing. If an individual gives such a notice, it must be honoured.

Each of Connect Entertainment's (Connect Auditions) external websites must include an online privacy statement, including procedures for accepting cookies (if relevant), fulfilling the requirements of applicable law.

Penalties

Penalties for violations of data protection laws include claims for damages by individuals whose personal data has been unlawfully processed, fines, and imprisonment. In addition, the supervisory authority may prohibit the wrong-doing company from engaging in certain acts of processing and impose other administrative sanctions.

Changes to this Privacy Policy

Connect Entertainment (Connect Auditions) may from time to time change this Privacy Policy or change, modify or withdraw access to this Site at any time with or without notice. However, if this Privacy Policy is changed in a material, adverse way, Connect Entertainment (Connect Auditions) will post a notice advising of such change at the beginning of this policy. We recommend that you revisit this Privacy Policy from time to time to learn of any such changes to this Privacy Policy.

Questions or Complaints

The supervisory authority in Australia for data protections and privacy matter is the Office of the Australian Information Commissioner (OAIC). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the OAIC.

Office of the Australian Information Commissioner – OAIC GPO Box 5218 Sydney NSW 2001 Phone: 1300 363 992

Fax: +61 (0)2 9284 9666 Online: <u>Enquiry form</u>

Relevant Legislation

Privacy Act (1988)

https://www.legislation.gov.au/Details/C2020C00237

Freedom of Information Act (1982)

https://www.legislation.gov.au/Details/C2020C00246

Australian Communications and Media Authority Act (2005)

https://www.legislation.gov.au/Details/C2020C00074

Telecommunications Act (1997)

https://www.legislation.gov.au/Details/C2020C00268

Enhancing Online Safety for Children (Consequential Amendments) Act (2015)

https://www.legislation.gov.au/Details/C2015A00025

Commission for Children and Young People Act (2012) (Vic)

https://www.legislation.vic.gov.au/in-force/acts/commission-children-and-young-people-act-2012/016

For further information regarding this Privacy Policy, please contact:

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