



GDPR PRIVACY POLICY

Please read this information carefully, this is the data protection and privacy notice for Frank Holder Management which provides information on how we use personal data relating to users of our websites and services. It also contains information on marketing activities and the use of cookies on our website.

Introduction

Frank Holder Management acts as a data processor when conducting our business activities, gathering and using the personal data of individuals. This can include clients, freelance agents, suppliers, employees, performers, graduates, actors, vocalists, dancers, models, choreographers and any other persons that FHM has a relationship with or needs to contact. This policy sets out how Frank Holder Management collect, use and protect any information you give us when you use this website or any of our services.

Frank Holder Management fund a cloud-based talent management and database platform called Tagmin, built specifically for Talent Agents, Casting Directors and Performers in the entertainment Industry. It is part of the Talent Systems family, integrates closely with Spotlight and has it's own privacy policy.

Frank Holder Management use the Spotlight Casting Platform which connects talented performers with the world's most successful agents and casting professionals working across stage and screen, Spotlight has their own privacy policy.

Frank Holder Management use these very reputable services because we want to ensure that your privacy is safeguarded, we want you to be assured that should we ask you to provide certain information, it will only be used in accordance with this policy. Please note that we may be required to update this policy from time to time in order to remain legal and compliant. It is important that you refer back to this page every now and then to ensure that you are happy with any changes that are made.

Our Commitment to Your Privacy

As a Talent Agent, our job is to represent you, promote your work, and find you incredible opportunities. To do that successfully, we need to collect and share some of your personal information (like your headshots, showreels, contact details and CV).

Under data protection laws like **GDPR**, we are responsible for keeping this information safe. This Privacy Policy is our promise of transparency to you

Why we Need a Privacy Policy

- **GDPR:** Complies with GDPR and follows good practice.
- **Protection:** Protects the rights of employees, talent and clients.
- **Data Breach:** Protects itself from the risks of a data breach.
- **Transparency:** You have the right to know exactly what information we collect, why we need it, and how we use it to build your career.
- **Securing Your Work:** We only share your details with trusted third parties – like Casting Directors, Producers and Production Companies – and only when it helps you get a job.
- **Protecting Your Likeness:** Your face, voice, and digital likeness are your most valuable assets. We ensure your audio and video files are handled with the highest level of security.
- **Giving You Control:** This police explains how you can update your details, request a copy of the data we hold, or ask us to delete your file if you choose to move on.

This policy was last updated on 24 October 2026 and adheres to the European Union's General Data Protection Regulation also known and referred to as GDPR.





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Frank Holder Management may collect the following information:-

Clients

- Name, company name and job title;
- Contact information including telephone number and email address;
- Business address and postcode;
- Other information relevant to your enquiry.

Talent

- Legal name and stage name
- Gender
- Date of birth
- Contact information including telephone number and email address;
- Information pertaining to disability, ethnicity and heritage
- Physical details such as height
- Demographic information including address and postcode;
- Statistics and work experience, training and skills;
- Images and videos;
- National Insurance Number
- National Insurance Number and UTR Tax number;
- Images/videos and statistics to enable us to assess whether you are suitable for a particular role.
- Copies of Identification – may include a passport, driver's licence, nationality card, ID Card.
- Technical information such as your browser or device type, or your IP address
- Information gathered by the use of cookies
- URLs and links to social media
- Photographs, showreels, video and audio clips, metadata relating to this such as copyright information

Young Performers

- Child/Performer Details: Name, date of birth, age, gender, location, measurements, appearance, school, medical information (often required for council performance licences), and casting or performance media (photographs, self-tapes, showreels and audio/video)
- Parent/Guardian Details: Name, contact information, relationship to the child, correspondence and payment or commission records.
- Safeguarding & Licensing: Chaperone names, Disclosure and Barring Service (DBS) and Local Authority performance licensing data.

Employees and Freelancers

- Name;
- Contact information including address, telephone number and email address;
- Details of previous work and/or employment;
- Details of National Insurance Number
- Other information to enable us to fulfil a contract or terms & conditions.

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Personal Information

When working with Frank Holder Management we will need continue to process data about you for as long as it is absolutely necessary. This will include and is not limited to:-

- Contact names and addresses
- Any correspondence with Frank Holder Management and other information that you have given Frank Holder Management through tagmin, applications, contracts, consent forms, medical information, feedback sheets etc.

These are the records that are used consistently when working with Frank Holder Management and with the data protection principles. This data that Frank Holder Management hold will be used for management and administrative use only, however, please not that from time to time we may need to disclose some of the data we hold to a relevant third party (e.g. when legally obliged to do so for example, by HM Revenue & Customs or if requested by yourself)

If Frank Holder Management hold any sensitive data about you (special categories of personal data), then this information will only be processed to meet Frank Holder Managements legal responsibilities or you will be asked to give express consent for this information to be processed.

Protecting Your Rights - Frank Holder Management only use your data when it is fair to do so and never in a way that hurts your privacy. We will only process your information if we have a genuine and legitimate business reason and we are not harming any of your rights and interests.

What we do with Information we collect.

Clients

Frank Holder Management require this information

- understand on how best to provide an excellent service
- continue to provide an on-going customer service
- maintain internal record keeping
- maintain records for accounting purposes
- send updated information in relation to your enquiry.

Artistes – Actors, Vocalists, Dancers, Models, Real People

Frank Holder Management require this information:-

- For Internal record keeping
- To be able to contact you in relation to work enquiries
- To send updated information

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Young Performers

- Managing representation, casting submissions and job bookings
- Fulfilling legal requirements such as securing child performance licences from local councils.
- Communicating updates, handling financial transactions and maintaining account records.

Tagmin

Tagmin helps Frank Holder Management comply with the UK GDPR and Data Protection Act 2018 by acting as a compliant data processor and providing built-in privacy and access-control features.

How Tagmin Functions Under GDPR

- **Data Processor Role:** Under Tagmin's terms, talent agents and agencies act as the data controllers, while Tagmin acts as the data processor (pursuant to Article 27 of the UK GDPR). Tagmin processes personal data strictly on the agency's instructions.
- **Role-Based Access Controls:** Tagmin features tiered user permissions, allowing agency "Superusers" to control what tabs and sensitive data standard users can see. Agencies can restrict data visibility in line with GDPR minimization principles.
- **Security & Authentication:** The platform supports strong password enforcement, two-step authentication, IP-based access restrictions, and automatic account lockouts after failed login attempts to prevent unauthorized data access.
- **Log Rotation & Data Retention:** Server web access logs (including IP addresses) automatically rotate and get deleted every 30 days. Agencies using the platform can also manage and delete client or personal data when agreements end or upon request.
- **Data Protection Guidance:** Tagmin provides security guidelines aligned with information Commissioner's Office (ICO) recommendations to help agencies maintain compliant internal data handling processes.

View Tagmin's Privacy Policy Here <https://www.tagmin.co.uk/privacy/>

Spotlight

The official casting and performer platform **Spotlight** (operated by Talent Systems Europe Limited)

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Overview of Spotlight's Privacy Policy

- **Data Controller:** Spotlight (Talent Systems Europe Limited) acts as the data controller for personal information collected through its platform.
- **Information Collected:** Personal identifiers, contact details, profile information, transaction records, and communication history. Because Spotlight profiles function as public promotional tools, data included in public-facing profiles can be viewed by other users and the public.
- **Lawful Bases:** Data is processed based on contract fulfillment, legal compliance, legitimate interests, and user consent.
- **Data Security:** Protected through risk assessments, access limitations, encryption, firewalls, and system monitoring.

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- User Rights: You have the right to access, correct, port, restrict, delete, or object to the processing of your personal data, as well as opt out of marketing communications.

Contact Information

- Data Protection Officer / Support: You can reach out via the Data Access Rights form on the [Spotlight Privacy Policy Page](#) or email data.protection@spotlight.com.
- Registered Address: 16 Garrick Street, London WC2E 9BA

RETENTION & SHARING

Any personal data held by us for marketing updates will be kept by us until such time that you notify us you no longer wish to receive this information.

Data is generally not shared with third parties for marketing, though necessary details may be shared with Casting Directors, Production teams or local councils as required by law.

SECURITY

We are committed to ensuring that your information is secure and protected against unauthorised or unlawful processing, accidental loss, destruction and damage. In order to prevent unauthorised access or disclosure, we use secure servers to store personal information. We also use the following software Tagmin, Google Drive / Drop box which are all GDPR compliant. Paperwork & Personal data collected in paper form is stored in locked filing cabinets and professionally shredded when no longer required

SECURITY BREACHES

Despite all the controls we have put in place to address all the key GDPR principles, there is still always a risk a data breach may happen. In the unlikely event of this, the breach will be notified to all data subjects affected without undue delay. If appropriate, this will also be reported to the ICO within 72 hours of us becoming aware. The person who should be informed of any breaches Desirée Collins, CEO and Mariah Collins Lead Agent, and are both contactable by email at all times: office.frankholdermgmt@gmail.com

THIRD PARTY PROCESSING

Our work for you may occasionally require us to pass your information to our clients for the purpose of possible work. Where we are entering into an engagement with a third party, we will seek to be satisfied that they have secure measures in place, so your privacy rights continue to be protected as outlined in this policy.

We only disclose information that is necessary to deliver our services and we never allow your personal data to be used by any third party for any market research, marketing or other commercial purposes. Under GDPR law, we may be required to disclose your data for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

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YOUR RIGHTS UNDER GDPR

Your principle rights under GDPR are:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and

This means you have the right to know what data we are holding for you at any time, the right to access this data, change it and/or have it removed from any further processing activity.

SUBJECT ACCESS REQUEST

If you would like to contact us with a subject access request, please use the email address office.frankholdermgmt@gmail.com with 'GDPR Subject Access Request' in the subject line. We will contact you within ten days of receiving this request.

If you are unhappy with the way your subject access request has been dealt with, you have the right to report a concern with a supervisory authority. In the UK, this is the Information Commissioner's Office www.ico.org.uk/concerns/

RESPONSIBLE PERSON FOR GDPR are Desirée Collins & Mariah Collins: office.frankholdermgmt@gmail.com