

Privacy Policy

Introduction

Your privacy and our obligations to you around our collection and use of your personal information are important to Subtext Pictures Pty Ltd (ABN 27 611 707 405) and its related entities (together referred to in this Privacy Policy as, “the Company”).

This policy explains the purposes for which the Company collects, uses and discloses personal information, the types of personal information that the Company may collect, who information may be collected from and the processes that the Company has in place to enable individuals to access or update their personal information, or to lodge a complaint.

The Company is committed to respecting your privacy and to our compliance with the Australian Privacy Principles in the Privacy Act 1998 (Cth).

Why do we collect, use, hold and disclose personal information

The Company collects and uses personal information for the planning, development, production, distribution and promotion of the Company’s film/television or other productions. In particular, the Company may collect personal information for the following purposes:

- to assess the suitability of persons applying to participate in the Company’s productions, including for on-screen roles or as crew, during development, production or marketing of our productions;
- if applicable, for inclusion in the Company’s film/television or other productions, including in the case of on-screen roles and crew, for providing on-screen and advertising credits;
- for direct marketing communications of the Company productions;
- organising any competitions run in connection with the Company productions;
- for day-to-day administration of our business as a film or television producer, including if necessary to answer enquiries or to resolve any complaints;
- for conducting research for the writing of scripts for Company productions.

When we collect personal information

We collect personal information from you:

- when you are involved in a project being submitted to us (**Note that we will not accept any unsolicited project submissions**);
- when you make contact with us and disclose your personal information;

- when you apply for a job or a role on our productions including as an actor, writer, director, producer, technician or to supply other services and facilities to our productions and in the course of carrying out these functions;
- when you apply to participate in one of our productions in any other way, such as in a studio audience, as an on-screen participant, in crowd scenes or in any viewer interaction or in any competition related to our productions;
- when you are otherwise associated with the development, finance, production and marketing of one of our productions;
- when you provide feedback about our productions or our other activities;
- when we conduct research with you as a person interviewed for the development of scripts for the production.

We may also collect your personal information from third parties (see following paragraph "How we collect personal information").

You do have the right to contact us and deal with us anonymously or by using a pseudonym, however in some such situations it may be impractical for us to deal with you or provide you with the assistance you request.

How we collect personal information

We may collect personal information in person, in writing, over the phone, by email, on line through social media platforms and via our website, via video or other recordings.

On occasions we may collect information from third parties including:

- from participants in or contributors to our productions, including production partners or any co-producers;
- from casting and talent agents and managers;
- from contractors that supply services to our productions;
- from funding bodies, financiers and licensees associated with our productions;
- from advertisers and promotional partners
- from research subjects/consultants.

What personal information do we collect?

Personal information is information about you that identifies you or might identify you. The information that we will collect depends upon the reason we seek it. Personal information that we may collect about you includes your name, address, telephone number, email address, work or other contact details, A.B.N. and date of birth.

When you apply for a job or seek an on-screen role we may also obtain additional information such as your education, qualifications and work history, citizenship and residency, gender, appearance and physical characteristics (including photographs). We may also need to ask you to provide us with sensitive information including medical history (for example, to deal with any on-set medical issues or as part of any insurance application process for our productions) and whether you have a criminal record (for example, if required in order for an individual to work with children or for any overseas visas or work permits).

We will only collect personal information about you if that information is reasonably necessary for our functions or activities.

Also, we will only collect sensitive information about you if you consent to us collecting that information. Sensitive information includes information or opinion about: racial or ethnic origin, membership of a professional or trade association, membership of a trade union, an individual's criminal record and health information.

If you are engaged to work on a Company production a more detailed list of personal information that we will collect is:

Personal information that may be collected from cast and on-screen personnel and crew members and researchers and other underlying rights contributors:

- contact information (email, address, telephone numbers, etc)
- date of birth
- next of kin (which may include marital status)
- resume/employment history
- qualifications
- bank details
- superannuation information
- driver's licence details and driving record
- dietary issues (if relevant for on-set catering or travel purposes)
- citizenship
- country of residence
- medical information and history

- union membership or professional trade associations or guilds (if relevant for contracting)
- passport information (if required to travel overseas or from overseas to Australia)
- information required to obtain a visa to enter an overseas country or to work in Australia, which may include sensitive information such as whether you have a criminal record
- physical characteristics and body measurements (e.g., for wardrobe requirements)
- photographs, audio recordings and audio-visual recordings
- racial and ethnic background (if relevant)

The holding and storage of personal information

We seek to keep your personal information safe and secure, whether it be as a hard copy or in an electronic format. Information which is kept at our offices is protected by a security system for our premises and can only be accessed by our personnel.

We also have procedures to protect data stored electronically (via email and stored on computers or electronically) and to make all our staff aware of the need for protecting personal information and adherence to this Policy and the Australian Privacy Principles.

We employ secure destruction procedures when paper copies of your personal information are no longer required by us.

We will destroy or de-identify personal information which is unsolicited and is not necessary for us to carry out our activities, provided we are not required to retain that information by law.

Who do we disclose personal information to?

The Company will not disclose your personal information to third parties except (i) as set out in this Policy; or (ii) for the particular purpose for which the personal information was collected; or (iii) with your consent.

We may disclose personal information to third party service providers engaged by the Company, for example, a casting agent or an accounting or pay-roll company or other third party contractor (including its employees) engaged on a Company production. Our business 'partners' - including television networks, our investors and financiers, our insurers, our sales agents and distributors, our travel agents and other goods and service suppliers - may also be provided with your personal information where reasonably necessary for us to carry out one or more of our functions or activities.

We may provide your contact details to a third party business we engage to manage our other production or marketing services. Some information may be seen by our viewing audiences when they watch the Company productions.

Where you work on a Company production:

- your name and position may also be included on the credits of the production and in associated marketing materials;
- your details made be disclosed as necessary for immigration, travel and accommodation purposes, if we arrange your travel;
- some government funding departments and agencies require aggregated details relating to a production, including, for example, job applicants (including details of state of residence) and some financial arrangements (for example, the tax rebate known as the Producer Offset) may require specific personal information about you and your engagement with the Company, including your name, nationality, residence and contract details, including payments and other benefits;
- personal information may be provided to the Media Entertainment and Arts Alliance or other applicable union or guild organisations, including for the purpose of calculating and paying residuals to on-screen talent.

We may also disclose collected personal information in confidence to a third party who expresses interest in purchasing our business or in the event we propose to sell our business or for the purposes of merger or re-organization.

Personal information provided to a Company may be shared with other related companies within the Company group and used and disclosed for the above purposes by such companies.

The Company productions are intended to be marketed throughout the world and in the course of financing, licensing and distributing our productions we may need to provide personal information about you to our distributors, broadcasters and sales agents, including your contact details and contractual entitlements.

We may also need to disclose personal information if required by law, including, for example, to government agencies such as Centrelink.

Your right to access to personal information and to request corrections

Should you wish to access or correct personal information that we hold about you, please make a written request to our Privacy Officer (contact details are set out at the end of this Policy).

It is your right to request access to your personal information held by us. Situations where we may need to refuse to give you access include where legal proceedings have been commenced or are anticipated. You also have the right to request corrections to personal information about you if it is inaccurate, including if it is out of date. Our Privacy Officer will endeavor to resolve any disputes regarding whether your personal information that we hold is correct.

We will seek to respond to your written request within 30 days of its receipt. The Company may charge a fee, as appropriate, in certain circumstances in order to facilitate access to your personal information. No fee is charged to correct personal information.

Changes to this Policy

Please note that the Company may change its privacy policy from time to time and the revised policy will be posted on our website.

If you have a complaint

We encourage you to contact us if you have any concerns about the use of your personal information. If you believe we have breached the Australian Privacy Principles please contact our Privacy Officer (contact details are set out at the end of this Policy). All complaints will be considered by the Privacy Officer who will endeavor to resolve the matter with you. If the complaint is not satisfactorily resolved the complaint may be taken to the Office of the Australian Information Commissioner (telephone: 1300 363 992; website: www.oaic.gov.au).

Privacy Officer's contact details

- **Rebecca Greensill**
- **rebeccagreensill@subtextpictures.com**