

# ICM PRIVACY POLICY

Effective Date: September 27, 2019; Last Updated: December 18, 2019

## Applicability

This policy describes ICM Partners' ("ICM") online and offline information collection and use practices. It applies to information we collect from web visitors when you interact with us. It also applies to our interactions with potential and current clients and to job applicants and employees. You can print a copy of this policy by clicking [here](#).

## Categories of Information We Collect

Listed below are details about the categories of information we collect:

**Contact information and identifiers.** We collect name, email address, and home address. We also collect phone numbers. From employees and clients, we collect social security numbers.

**Payment information.** We collect federal tax ID, W-9 information, and banking information from employees and clients.

**Representation information.** We may collect certain preferences or details related to representation of clients. This includes travel, payment, and booking preferences. We may also collect information about former bookings and former representation.

**Employment information.** We collect resume, education and employment history from applicants and employees. We also collect credentials and background check results from potential employees.

**Demographic information:** From potential and current clients, we collect date of birth and gender. We also collect national origin and height.

**Site usage information.** We collect logs and session data when you visit our website or use our applications. We collect browser and operating system information. We collect what site you came from or what site you visit when you leave us. We collect your IP address. We also collect device identifiers.

## Business Purposes for Information Use

We use the categories of information collected for the business and commercial purposes outlined here:

**We use information to respond to your requests and for transactional purposes.** We use contact information to respond to you. We use contact and payment information to process payments for clients and wages for employees. We use contact and employment information to communicate about a job application.

**We use information to provide you services.** We use contact, representation, and demographic information to find bookings for our clients. We also use payment information to provide services related to bookings for our clients.

**We use information for marketing purposes.** We may use contact information to provide you with information about new services or updates.

**We use information for employment purposes.** We use contact, demographic, and employment information for internal human resources purposes. We use payment and employment information to provide payroll and benefits to our employees.

**We use information to protect our company and constituents.** We use contact, demographic, site usage, and employment information collected to protect our company and our clients. We use this same information to identify fraud and secure our systems. We will also use all categories of information for other purposes as permitted by law.

**If you are in Europe:** Our basis for processing your information is typically to perform a contract. Performance of a contract includes responding to your request. We also process information based on consent or for our legitimate interest.

## How We Collect Information

We collect categories of information in the following ways:

**We collect information directly from you.** We collect contact, payment, and representation information from clients. We also collect demographic information. We may collect this online or by phone. We may also collect this in person or on paper forms. We collect information and payment information if you apply for a job.

**We collect information passively.** We collect site usage and demographic information passively use tracking tools. These include cookies and pixels. We collect site usage information about users over time when they use our websites. This includes usage and browser information. We may have third parties collect information this way.

**We get information about you from third parties.** We collect contact, payment, representation, and demographic information from third parties. This includes people authorized to represent you or your bank. It also includes buyers of client services such as venues, production companies, or tv networks.

## We Combine Information

We combine information that we have collected offline with information we collect online. We also combine information we get from third parties with information we already have.

## When We Share Information with Others

We share information with other entities and companies. Here is a description of how we share categories of information:

**We share information with those who perform services on our behalf.** We share contact, payment, and demographic information with companies who serve as our vendors and perform services on our behalf. This may help us provide our services to you or to help us review your job application.

**We share information with our buyers and business partners.** We share contact, representation, and demographic information with third parties that want our clients' services.

**We share information if we think we have to in order to comply with the law or to protect you or ourselves.** We will share information we collect about you to respond to a court order or subpoena. We will also share information if a government agency or investigatory body requests it. We may share information we collect if we are investigating potential fraud.

**We share information with any successor to all or part of our business.** If all or part of our business was sold, we may share your information as part of that transaction. If there is a merger or acquisition, we may also share your information. If there is a financing or bankruptcy, we may share your information.

**We may share information as permitted by law and for other reasons we may describe to you.**

## You Have Certain Choices

**You can opt out of certain marketing.** To stop receiving our promotional emails, follow the "unsubscribe" instructions in any promotional message you get from us. Even if you opt out of getting marketing messages, we will still send you transactional messages. These include responses to your questions or other necessary information to represent you.

**California residents' rights.** If you reside in California and are not a job applicant, employee or employee of another company interacting with us in your job role, you have the right to ask us what information we collect and use. You also have the right to ask what information we disclose and sell. You also have the right to request that we delete information we have collect from you. To exercise your rights contact us at 833-426-0011 or visit our website here. We will verify that your information matches information that you have previously provided to us. We will not discriminate against you because you have exercised any of your rights under the California Consumer Privacy Act. You can designate someone else to make a request by having them execute a notarized power of attorney to act on your behalf.

**Sales of information.** Under California law we are required to tell you if we "sell" information as that term is defined by applicable law. Sell means to share personal information with a third party for monetary or other valuable consideration. We do not do this based on our understanding of that term. We also have disclosure obligations in Nevada. There, we do not exchange Nevada residents' personal information for money with anyone so they may license or sell the personal information to additional parties. We do not sell personal information of minors under the age of 16. Nevada residents may opt out of the future sale of their information to a third party so that they may license or sell information by emailing us at [privacy@icmpartners.com](mailto:privacy@icmpartners.com).

**EU Residents.** As required by law, you have certain rights. This includes a right to access, correct, and erase your information. You also have the right to lodge a complaint with your local supervisory authority. Please contact us at [privacy@icmpartners.com](mailto:privacy@icmpartners.com) to exercise your rights.

## **Our Sites Are Not Intended for Children.**

Our sites are meant for adults. We do not knowingly collect personally identifiable information from children under 13. If you are a parent or legal guardian and think your child under 13 has given us information, you can contact us at the email or address listed at the end of this Privacy Policy. Please mark your inquiries "COPPA Information Request."

Parents can learn more about how to protect children's privacy on-line here.

## **We Use Reasonable Security Measures**

We use appropriate and reasonable security measures as required by relevant law. We keep information for as long as necessary or relevant for the purposes described here.

## **We Store and Use Information Inside the United States**

Information we collect may be stored and processed in the United States. If you live outside of the United States, you understand and agree that we may transfer your information to the United States. The United States may not afford the same level of protection as the laws in your country. By submitting your information you agree to the processing of it in the US as permitted by law. We keep personal information as long as it is necessary or relevant for the practices described in this Policy. We also keep information as otherwise required by law.

## **Third Party Sites and Links**

We may link to third-party sites. Our sites may also include third party content that collects information. We do not control these third parties. This Policy does not apply to the privacy practices of that website. Please read the privacy policy of other websites carefully. We are not responsible for the practices of these third-party sites.

## **Contact Us**

If you have questions about this Policy, you can write to us at: ICM Partners, Attn: Privacy Office, 10250 Constellation Boulevard Los Angeles, CA 90067. You can email us at [privacy@icmpartners.com](mailto:privacy@icmpartners.com). You can call us at 833-426-0011.

## **Policy Updates**

We may make changes or updates to this Policy. We will notify you at your email address we have on file of any material changes to this Policy as required by law. All changes will also be posted on our website. Please check our site periodically for updates.