

PRIVACY POLICY AND POPIA COMPLIANCE

VIVID TALENT AGENCY (PTY) LTD

Registration Number: 2026/534092/07

Website: www.vividtalent.co.za

Email: hello@vividtalent.co.za

Address: 4 Rye Street, Graanendal Estate

Last Updated: 19 August 2026

1. Introduction

Vivid Talent Agency (“we”, “us”, “our”) registration number 2026/534092/07 is a talent and model agency. We operate the website at **www.vividtalent.co.za** (the “Website”) and related digital services including our online talent submission portal.

We are committed to protecting your personal information and being transparent about what we collect, why we collect it, and how we use it. This Privacy Policy explains our practices in plain language.

By using our Website or submitting your details through our talent application form, you confirm that you have read and understood this policy.

2. Information We Collect

We collect two categories of information: information you give us directly, and information collected automatically when you visit our Website.

2.1 Information You Give Us Directly

When you submit a talent or model application through our “Join” form, you may provide:

- Full name
- Date of birth and age
- Birth Certificate
- Gender
- Contact details including email address, phone number
- Physical measurements and appearance details of your child (height, hair colour, eye colour, clothing sizes, shoe size)
- Photographs and headshots
- Registration numbers, VAT numbers, PAYE Numbers, physical + postal address, website
- Social media handles or links to your portfolio

If you contact us by email or through a contact form, we also collect the information you include in that communication.

2.2 Information Collected Automatically

When you visit our Website, certain technical information is collected automatically by our web server and third-party analytics tools. This includes:

- Your IP address
- Browser type and version
- Device type and operating system
- Pages visited and time spent on each page
- Referring website (the site you came from)
- Date and time of your visit
- Screen resolution and language settings

This information does not identify you personally in isolation but may do so in combination with other data. It is collected using cookies and analytics tools. See Section 4 (Cookies) and Section 5 (Google Analytics) for full details of what is collected and how.

3. Cookies

3.1 What Are Cookies

Cookies are small text files placed on your device by websites you visit. They are widely used to make websites work efficiently and to provide information to website owners. Some cookies are essential for the site to function; others are used to collect analytics data or remember your preferences.

3.2 Cookies We Use

Our Website uses the following categories of cookies:

Essential cookies

These cookies are necessary for the Website to function and cannot be switched off. They are usually set in response to actions you take, such as setting your privacy preferences or using the talent submission form. Without these cookies, services you have requested cannot be provided.

- `pp_consent` — stores your cookie consent decision (accept or decline). Expires after 365 days.

Analytics cookies

These cookies allow us to count visits and understand how visitors use our Website, so we can improve it. All information collected is aggregated and anonymous. These cookies are only placed after you have given your consent.

- `_ga` — Google Analytics. Distinguishes unique users. Expires after 2 years.
- `_ga_XXXXXXX` — Google Analytics. Maintains session state. Expires after 2 years.

Preference cookies

These cookies remember choices you make on our Website to give you a more personalised experience.

3.3 Your Consent Choices

When you first visit our Website, a cookie banner is displayed. You may accept all cookies or decline analytics cookies. If you decline, only essential cookies will be placed. Your preference is saved for 365 days.

You can change your cookie preferences at any time by clicking the “Manage cookies” link in the footer of our Website.

You may also control cookies through your browser settings. Note that disabling all cookies may affect the functionality of our Website. For guidance, visit your browser’s help documentation or www.allaboutcookies.org.

3.4 What Happens if You Decline Cookies

If you decline analytics cookies, no tracking request is sent to Google Analytics or any other analytics provider. Your visit is not measured or tracked. Only the pp_consent cookie (essential) is placed to remember your preference.

4. Google Analytics

We use Google Analytics 4, a web analytics service provided by Google LLC (“Google”). Google Analytics collects information about how you use our Website and reports this back to us in aggregated form.

4.1 What Google Analytics Collects

When you accept analytics cookies, Google Analytics may collect:

- Pages you visit on our Website and time spent on each page
- How you arrived at our Website (e.g. from a search engine or another website)
- Your approximate geographic location (city and country level, derived from IP address)
- Your device type, browser, and screen resolution
- Events such as button clicks or form interactions

Google Analytics assigns each visitor a unique client ID stored in the _ga cookie. This allows Google to recognise returning visitors. We do not link this ID to any personally identifiable information.

4.2 How We Use Google Analytics Data

We use this information to:

- Understand which pages are most popular and improve our Website content
- Identify technical problems and improve site performance
- Understand where our audience comes from to inform our marketing

We do not use Google Analytics to track individual users or build personal profiles.

4.3 Google's Use of Your Data

Google processes data collected by Google Analytics on our behalf in accordance with Google's terms of service. Google may also use this data for its own purposes, including improving its products and services. For more information, see Google's Privacy Policy at policies.google.com/privacy.

We have configured Google Analytics with IP anonymisation enabled, which means the last portion of your IP address is masked before it is stored.

4.4 Consent Requirement

Google Analytics does not load on our Website unless you have explicitly accepted analytics cookies through our cookie banner. If you have not accepted, or if you later withdraw consent, no data is sent to Google Analytics during your visit.

4.5 Opting Out

You may opt out of Google Analytics tracking in two ways:

- Using our cookie banner: click "Manage cookies" in the footer and change your preference to Decline.
- Installing the Google Analytics Opt-out Browser Add-on, available at tools.google.com/dlpage/gaoptout.

5. Talent Applications — Join

Our Website includes a talent submission form ("Join") through which individuals can apply to be represented by our agency. This section explains specifically how we handle the personal information & photographs submitted through this form.

5.1 Information Collected Through Talent Submissions

When you submit a talent application, you are voluntarily providing us with personal information including your name, contact details, physical details, photographs. Some of this information — particularly photographs and videos that capture your physical appearance — may be considered sensitive personal data in certain jurisdictions.

By submitting your application, you give us permission to:

- Review and evaluate your application
- Store your submission in our secure talent management system
- Contact you about the outcome of your application
- If accepted, include your profile in our internal talent roster
- Share your profile with clients and casting directors for legitimate booking opportunities
- Display your profile on our agency website and digital presentations to clients, if you consent to this separately

5.2 Photographs and Videos

Photographs and video content submitted through our talent application form are used solely for the purpose of representing your talent to potential clients and employers. We will not:

- Sell, license, or transfer your images or videos to third parties for their own commercial use
- Use your images or videos in advertising or marketing materials without your separate written consent
- Alter or manipulate your images in a misleading or derogatory manner

Approved talent who are added to our roster will have their images and professional details displayed on our agency website and in digital client presentations.

5.3 Unsuccessful Applications

If your application is not successful, we will retain your submission for a period of

[e.g. 3 months] in case a suitable opportunity arises, after which it will be securely deleted unless you request earlier deletion. We will notify you of this retention period at the time of our decision.

5.4 Age Requirement and Parental Consent

You must be 18 years of age or older to submit a talent application independently. If you are under 18, your application must be submitted by a parent or legal guardian who accepts this Privacy Policy on your behalf.

For applicants under 18, we require written parental or guardian consent before processing the application. Please contact us at hello@vividtalent.co.za for the appropriate consent form.

5.5 Legal Basis for Processing Talent Submissions

We process talent application data on the following legal bases:

- Consent: you have submitted your information voluntarily for the purpose of seeking representation. You may withdraw consent at any time by contacting us (see Section 16 for our contact details).
- Legitimate interests: we have a legitimate business interest in maintaining a talent roster and connecting talent with opportunities, provided this does not override your rights and interests.
- Contractual necessity: where you are accepted and enter into a representation agreement with us, we process your information as necessary to fulfil that contract.

6. How We Use Your Information

We use the information we collect for the following purposes:

- Operating and improving our Website
- Responding to enquiries and communications
- Processing and evaluating talent applications
- Managing talent rosters and agency operations

- Connecting talent with suitable booking opportunities
- Sending booking confirmations, schedules, and related correspondence to represented talent
- Processing talent payments and maintaining financial records
- Complying with our legal obligations
- Detecting and preventing fraud or misuse of our services

We do not use your information for automated decision-making or profiling in a way that produces legal or similarly significant effects.

7. Who We Share Your Information With

We do not sell your personal information. We may share it with the following parties:

7.1 Clients and Casting Directors

For represented talent, we share your professional profile (name, images, measurements, and experience) with clients, production companies, photographers, casting directors, and advertising agencies for the purpose of securing bookings and opportunities on your behalf.

7.2 Service Providers

We share information with third-party service providers who help us operate our business, including:

- Portfoliopad / Mainboard — our talent management software platform, which stores and manages talent profiles and bookings
- Cloud storage and hosting providers
- Email and communication services
- Payment processors (for talent compensation)
- Website analytics (Google Analytics, subject to your consent)

All service providers are contractually required to handle your information in accordance with applicable privacy laws and only to use it for the purposes we specify.

7.3 Legal Requirements

We may disclose your information to law enforcement, regulators, or courts where required by law, to protect the rights and safety of our staff and clients, or to enforce our legal agreements.

7.4 Business Transfers

If we are involved in a merger, acquisition, or sale of assets, your personal information may be transferred as part of that transaction. We will notify you of any such transfer and your rights in relation to it.

8. Data Retention

We retain your personal information for as long as necessary for the purposes described in this policy:

- Website analytics data: retained by Google for up to 14 months (as configured in Google Analytics)
- Cookie consent records: retained for 365 days
- Unsuccessful talent applications: retained for **6 months** from the date of decision, then securely deleted
- Active talent profiles: retained for the duration of your representation agreement and for a reasonable period after it ends, for legal and accounting purposes
- Financial records relating to talent payments: retained for **7 years** as required by tax law
- Communications and correspondence: retained for up to 3 years unless a longer period is required

When information is no longer required, we securely delete or anonymise it.

9. Your Rights

Depending on where you are located, you may have the following rights in relation to your personal information. You can exercise any of these rights by contacting us using the details in Section 16.

9.1 Rights Available to All Users under POPIA

- Right to access: request a copy of the personal information we hold about you
- Right to rectification: ask us to correct information that is inaccurate or incomplete
- Right to erasure: ask us to delete your personal information (subject to certain legal limitations)
- Right to withdraw consent: where processing is based on your consent, you may withdraw it at any time without affecting the lawfulness of processing before withdrawal
- Right to object: object to our use of your information in certain circumstances

10. Data Security

We take appropriate technical and organisational measures to protect your personal information against accidental loss, unauthorised access, alteration, or disclosure. Our talent management platform employs industry-standard security controls including encrypted data transmission (HTTPS), access controls, and secure cloud infrastructure.

While we take every reasonable precaution, no method of internet transmission or electronic storage is 100% secure. If we become aware of a data breach that is likely to affect your rights, we will notify you and the relevant authorities as required by law.

11. International Transfers of Data

Where necessary, your information may be transferred outside of South Africa. We ensure that any such transfers comply with POPIA and applicable foreign data protection laws.

12. Children's Privacy

Talent applications from individuals under 18 require parental or guardian consent as described in Section 6.4. Please contact us at hello@vividtalent.co.za with any concerns.

13. Third-Party Links

Our Website may contain links to third-party websites, social media platforms, and casting platforms. This Privacy Policy does not apply to those sites. We encourage you to review the privacy policies of any third-party sites you visit.

14. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, or legal requirements. When we make material changes, we will update the "Last updated" date at the top of this page and, where appropriate, notify represented talent by email.

We encourage you to review this policy periodically to stay informed about how we protect your information.

15. Contact Us

If you have any questions about this Privacy Policy, wish to exercise your rights, or have a concern about how we handle your personal information, please contact us:

Email: hello@vividtalent.co.za

We aim to respond to all privacy enquiries within 30 days.