



Damselfish Productions LTD - Privacy Policy

Last updated: 20.05.2026

1. Who we are

Damselfish Productions Ltd is a film production company registered in England and Wales (company number: [●]). Our registered office is at: Flat 33 Brandrams Wharf, 127-131 Rotherhithe St, London, SE16 4NF UK. We are the controller of personal data processed via our website and in the course of our business.

- Contact: Charlotte Ginsborg
Flat 33 Brandrams Wharf, 127-131 Rotherhithe St, Londo, SE16 4NF
charlotteginsborg@yahoo.co.uk

If you are based in the EU and we target or monitor you there, we may appoint an EU representative. Details will be provided on request or in regional notices if applicable.

2. What this policy covers

This policy explains how we collect, use, share, and protect personal data:

- When you visit our website or social media pages.
- When you contact us, subscribe to updates, or download materials.
- When you submit to casting/callouts or participate as a contributor.
- When you provide services to us or we provide services to you.
- When you apply for a job, internship, or freelance role.
- When we handle footage and associated metadata for development, production, post-production, distribution, and festival submissions.

This policy should be read in conjunction with any project-specific notices or contributor release forms we provide.

3. The data we collect

- Identity and contact data: name, email, phone, address, company, job title, social handles.

- Participation/contributor data: biography, voice and image (audio/video), stills, on-camera contributions, releases, availability, travel details, consent forms, payment details.
- Special category data (only where necessary and lawful): health information (e.g., access needs, on-set safety), racial or ethnic origin, religious or philosophical beliefs, trade union membership, sexual orientation, political opinions, biometric data for identification, or data concerning criminal offences where relevant to a project or legal requirement. We only process this with a valid legal basis and, where required, your explicit consent or another permitted condition under UK law.
- Applicant data: CVs, portfolios, references, right-to-work information, interview notes, diversity data if provided.
- Financial and transactional data: invoices, payment records, VAT details, bank details (for payees).
- Technical/usage data: IP address, device identifiers, browser type, pages visited, time on page, referring URLs, cookies and similar technologies.
- Marketing preferences: newsletter opt-in/opt-out, engagement metrics.
- Rights requests: copies of IDs and correspondence for identity verification when you exercise data rights.

4. How we collect data

- Directly from you: forms, emails, calls, meetings, submissions, on-set, casting/callouts, newsletters, contracts, invoices.
- Automatically: cookies, analytics, and similar technologies on our website.
- From third parties: casting agents, public databases, social media, collaborators, service providers, distributors, sales agents, and festival platforms; referees for applicants; and as otherwise permitted by law.

5. Why we use your data (purposes) and our legal bases

We process personal data only where we have a lawful basis under the UK GDPR and Data Protection Act 2018:

- To operate our website, deliver content, and ensure security and performance (legitimate interests; sometimes necessary for a contract).
- To respond to enquiries, negotiate and perform contracts, and manage relationships with clients, contributors, vendors, and partners (contract; legitimate interests).
- To run casting/callouts, assess suitability, manage contributors, and produce, edit, and distribute films, including festival submissions and publicity materials (contract; legitimate interests; public interest in freedom of expression and information; consent where required for special category data).
- To handle payments, accounting, and tax (legal obligation; contract).
- To recruit staff and freelancers (contract; legitimate interests; legal obligation).
- To send marketing communications where permitted (consent for email/SMS where required under PECR; legitimate interests for B2B email where appropriate, with the option to opt out at any time).
- To comply with legal obligations, exercise or defend legal claims, and maintain records (legal obligation; legitimate interests).

- To protect health and safety on set or events (legal obligation; vital interests; explicit consent or employment law condition where processing special category data is necessary).

Where we rely on consent, you can withdraw it at any time without affecting prior processing.

6. Cookies and similar technologies

We use:

- Strictly necessary cookies to make the site work.
- Optional functional and analytics cookies to improve the site.
- Optional advertising or social media cookies where in use.

You can manage preferences via our cookie banner/settings and your browser controls. For details, see our Cookie Notice.

7. Special category and criminal offence data

We avoid collecting this data unless strictly necessary (e.g., accessibility needs; sensitive details disclosed on camera as part of a documentary; safeguarding; or legal checks). Where required, we rely on a permitted condition, such as explicit consent, substantial public interest, legal claims, employment law obligations, or the journalistic/academic/artistic and literary expression exemption as applicable. We apply additional safeguards, need-to-know access, and minimisation.

8. Filming in public or at events

We may film in public places or at events. Notices may be displayed or announced. If you do not wish to be identifiable, speak to a member of our team on site when feasible. Editorial use and freedom of expression may apply. For private locations, we will liaise with the venue and display reasonable notices.

9. Who we share your data with

- Production partners and crew: directors, producers, editors, fixers, translators, and trusted freelancers under contract.
- Service providers: hosting, cloud storage, email, analytics, payroll/accounting, legal, insurance, security, festival submission platforms, subtitling/ADR, archival and media asset management.
- Distribution and publicity: sales agents, distributors, broadcasters/streamers, PR agencies, festivals and markets, awards bodies, and press where editorially relevant.
- Professional advisers and authorities: legal, tax, auditors, insurers, regulators, courts, police where legally required or to establish, exercise, or defend legal claims.
- Social media platforms and embedded services when you engage with our content or consent to cookies.

We require appropriate confidentiality, security, and data protection commitments from third parties who process data on our behalf.

10. International transfers

Your data may be transferred outside the UK (and the EEA) where our partners, cloud services, distributors, or festivals are based. When we do so, we use appropriate safeguards such as:

- UK adequacy regulations; or
- UK International Data Transfer Agreement (IDTA) or EU Standard Contractual Clauses with UK Addendum; and
- supplemental measures where necessary.

Details of relevant safeguards can be provided on request.

11. How long we keep your data

We keep data only as long as needed for the purposes set out above, including to meet legal, accounting, and reporting requirements. Typical periods:

- Contracts, invoices, and financial records: up to 6–7 years.
- Production records (including releases and contributor records): for the life of the project and any distribution/exploitation period plus a reasonable tail, given legal, editorial, and archival needs.
- CVs/applications: generally 6–12 months if unsuccessful, longer with consent for talent pools.
- Marketing data: until you opt out or your consent is withdrawn, plus limited retention to record your preference.
- Website analytics: as set in our Cookie Notice or platform controls.
We may retain minimal archival records where necessary to evidence rights clearances or compliance.

12. Security

We implement technical and organisational measures appropriate to the risk, including access controls, encryption in transit and at rest where appropriate, least-privilege permissions, secure disposal, vendor due diligence, and incident response procedures. No system is 100% secure; we continually review and improve our controls.

13. Your rights

Under UK data protection law, you have rights to:

- Access your personal data.
- Correct inaccurate or incomplete data.

- Erase your data in certain cases.
- Restrict processing in certain cases.
- Object to processing based on legitimate interests or to direct marketing.
- Data portability (where applicable).
- Withdraw consent where processing is based on consent.
- Not be subject to decisions based solely on automated processing that produce legal or similarly significant effects, subject to exceptions.

To exercise your rights, contact us at [privacy email]. We may need to verify your identity. You also have the right to complain to the UK Information Commissioner's Office (ICO): ico.org.uk | 0303 123 1113.

14. Direct marketing

- Email/SMS marketing: we rely on your consent where required by the Privacy and Electronic Communications Regulations (PECR). You can unsubscribe at any time via the link in our emails or by contacting us.
- B2B marketing: we may send relevant updates to business contacts based on our legitimate interests, with an easy opt-out in each message.

15. Children

Our services are not directed at children under 16. If we become aware we have collected personal data from a child without appropriate consent or another lawful basis, we will delete it.

16. Links to other sites

Our website may link to third-party sites or services. Those have their own privacy policies. We are not responsible for their practices.

17. Changes to this policy

We may update this policy from time to time. Material changes will be highlighted on this page and, where appropriate, notified to you by email. Please check back regularly.

18. How to contact us

- Address: Damselish Productions Ltd, Flat 33 Brandrams Wharf, 127-131 Rotherhithe St, London, SE16 4NF UK.
- Email: charlotteginsborg@yahoo.co.uk

If you are a contributor or participant and have questions about how your image, voice, or other personal data is used in connection with a specific project, please reference the project title and any release or contributor ID in your message.

For further information on government policy and guidelines we follow please reference:

<https://www.legislation.gov.uk/eur/2016/679/contents>