

Privacy Policy

1. Purpose of this Policy

The privacy and security of your personal information is important to us. We are committed to carefully and respectfully managing your personal information. This Policy outlines the way in which Truant Pictures collects, holds, uses and discloses personal information. In this Policy, “we”, “us” and “our” means each member of Truant Pictures. More information about the entities that comprise Truant Pictures can be found in the definitions at the end of this Policy.

2. What is personal information?

For the purpose of this Policy “Personal Information” has the meaning attributed to it in relevant Privacy Laws. Some examples of personal information include your name, address, telephone number, email address, date of birth, nationality, photographs, videos or audio recordings.

3. What personal information do we collect?

The type of personal information we collect from you depends on the nature of your interactions with us. We may collect personal information about:

- (a) our clients and business associates, potential clients and business associates, and any of their employees;
- (b) our suppliers and service providers, potential suppliers and service providers, and any of their employees;
- (c) our employees and contractors, former employees and contractors, and prospective employees and contractors; and
- (d) other people who come in contact with Truant Pictures or any of its employees.

“Sensitive Information” is a special type of personal information which receives additional protection under Privacy Laws, such as information about your religion, ethnicity, health or any criminal record. We will only collect sensitive information with your express consent (unless otherwise permitted by law) and where necessary. For example, if you apply for a job at Truant Pictures we may request details of your medical history and any criminal record, for the purpose of obtaining a visa or work permit allowing you to work at a Truant Pictures location.

4. How do we collect personal information?

We collect most personal information directly from you, whether in person, on the phone or electronically. This could be because you contact us, use our services or visit our websites and social media pages. There may also be occasions where we collect personal information about you from third parties, including from:

- (a) our clients, business associates and participants in Truant Pictures productions;
- (b) our suppliers and service providers;
- (c) agents or other representatives of employees, performers and artists; and
- (d) financiers, distributors and funding bodies associated with our productions.

We also collect information using cookies when you use our websites. “Cookies” are small pieces of information stored on your device. Cookies enable us to record information about your visit to our websites, allowing us to remember you the next time you visit and provide a more meaningful experience. You have the ability to erase or block the use of cookies from your internet browser.

5. How do we use your personal information?

The main reason we collect, use, hold and share your personal information is so that we can run our business, which may include:

- (a) confirming your identity (for e.g. during a recruitment process);
- (b) managing our relationship with you (for e.g. as part of your employment with us);
- (c) providing services to you (for e.g. when we respond to a tender or deliver animation services to you);
- (d) complying with our contractual obligations (for e.g. including your name in the credits of an

- Truant Pictures production); and
- (e) complying with our legal obligations or assisting government or law enforcement agencies (for e.g. responding to subpoenas or warrants).

6. Who do we share your personal information with?

We may share your personal information with companies within Truant Pictures, and with third parties outside of Truant Pictures where necessary to support our business operations. These third parties can include:

- (a) service providers and professional advisors (for e.g. auditors, accountants, lawyers and insurers);
- (b) businesses connected to our operations (for e.g. producers, financiers and distributors of productions serviced or produced by Truant Pictures);
- (c) your representatives (for e.g. agents, accountants and lawyers); and
- (d) regulatory bodies, government agencies and law enforcement agencies (for e.g. government bodies that administer film incentives and rebates).

7. Do we send your personal information overseas?

We may disclose your personal information to a recipient located overseas. This may include an Truant Pictures company located in Australia or the USA. If we do send your information overseas, it will be for one of the purposes identified in paragraph 5 and to one of the recipients identified in paragraph 6.

When we do disclose and/or store personal information overseas, this information is protected in the manner set out in paragraph 8.

8. How do we keep your information safe?

Truant Pictures is committed to keeping your personal information safe and secure. We store electronic and hardcopy records in secure buildings and systems. The measures in place to keep your personal information safe include:

- (a) *secure storage and handling*: we have information security procedures in place to protect the records and data stored and handled by Truant Pictures and its service providers;
- (b) *staff training*: all of our employees are required to complete training about privacy and information security;
- (c) *system security*: access to our information systems is controlled through both identity and access management controls;
- (d) *building security*: we maintain secure premises with controls that prevent unauthorised access;
- (e) *destroying or de-identifying data*: we only keep personal information for as long as we need it, and we take reasonable steps to destroy or de-identify personal information after we no longer need it.

9. Privacy of children

We recognise the need to provide additional protections in relation to personal information of children. Children under the age of 13 should not submit or post any personal information via our websites or social media channels without the written consent of their parents or guardians. If you are a child under the age of 13 and want to submit your personal information to us, please have your parents or guardian send an email to Truant Pictures's Privacy Officer using the details set out in paragraph 10. Parents may also access or request changes to the personal information of their children provided to us by contacting Truant Pictures's Privacy Officer. Truant Pictures does not sell or disclose any personal information we hold in relation to children, unless required to do so by law.

10. Accessing, updating and correcting your personal information

You can request access to the personal information we hold about you. You can also ask for corrections to be made. To do so, please contact Truant Pictures's Privacy Officer:

By email	hello@truantpictures.com
By post (Australia)	C/- Truant Pictures 87 Campbell Street, Newtown NSW 2042 AUSTRALIA
By post (USA)	1670 Beverly Blvd., Suite 8 Los Angeles CA 90026 USA

There is no fee for requesting that your personal information be corrected. In some limited circumstances, accessing your personal information may incur a reasonable charge to cover things such as locating the information and supplying it to you.

Under Privacy Laws your right to access your personal information, or make corrections to it, is not absolute and exceptions exist. For example, we are not required to give you access to your personal information where it would pose a serious threat to any person's life, health or safety, or to public health or safety, or where giving access would be unlawful, have an unreasonable impact on other people's privacy or where we reasonably conclude your request is frivolous or vexatious.

If we refuse to give you access to or to correct your personal information, we will write to you explaining the reasons for our decision.

11. Making a privacy complaint

If you have a question or complaint about how your personal information is being handled by us, our affiliates or service providers, please contact Truant Pictures's Privacy Officer using the details set out in paragraph 10.

We aim to resolve complaints within thirty (30) days of receipt but some complaints may take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are not satisfied with how we manage your complaint or our decision after you've been through our internal complaints process, you may also contact the relevant external body set out below:

<i>Australia</i> The Office of the Australian Information Commissioner	GPO Box 5218 Sydney NSW 2001 1300 363 992 www.oaic.gov.au
<i>USA</i>	Not Applicable

12. Notifiable data breaches

Under some Privacy Laws we are required to notify you and the relevant government privacy commissioner of certain categories of data breaches involving your personal information. If such a data breach occurs, we will comply with the relevant Privacy Laws. If you believe that any personal information we hold about you has been impacted by a data breach, you can contact us by using the details set out in paragraph 10.

13. Where we operate and applicable Privacy Laws

Truant Pictures has operations in each of Sydney, Australia and Los Angeles, USA. Truant Pictures entities located in:

- (a) Australia are bound by the *Privacy Act 1988* (Cth); and
- (b) the USA are bound by the federal *Privacy Act 1974* and the *California Civil Code* Sections 1798.83, 1798.100, 1798.105 and 1798.120.

14. California Privacy Notice

If you are a California resident, you may have certain additional rights as follows.

- (a) *California Civil Code Section 1798.83* permits you to request information regarding the disclosure of your personal information by certain members of Truant Pictures to third parties for their direct marketing purposes.
- (b) *California Civil Code Section 1798.100* and *105* permit you to make requests to access categories and specific pieces of personal information about you, as well as to request to delete personal information about you.
- (c) *California Civil Code Section 1798.120* permits you to opt out of the sale of your personal information to third parties.

Please note that Truant Pictures does not sell the personal information it collects to third parties. The way in which Truant Pictures collects, uses and discloses personal information is set out in paragraphs 3 to 7 of this Policy. Any Californian resident may exercise their privacy rights by contacting Truant Pictures's Privacy Officer, using the details set out in paragraph 10.

15. European Union Privacy Notice

Truant Pictures operates in Australia and the US. This means that if you provide your personal information to any member of Truant Pictures, such information will be transferred out of the European Union ("EU"). By providing us with your personal information you consent to the collection, use and disclosure of your personal information as set out in this Policy. From 25 May 2018, the *General Data Protection Regulation* ("GDPR") regulates the processing of personal information under EU law. GDPR aims to protect information relating to individuals in the EU, and to harmonise data protection laws across EU Member States.

Under GDPR personal information must be processed in a lawful, fair and transparent manner. If you are located in the EU, GDPR requires us to provide you with information about how we collect, use, share and store your personal information, as well as advising you of your rights as a data subject. Truant Pictures collects, uses and discloses personal information as set out in paragraphs 3 to 7 of this Policy. If you are located in the EU and have an enquiry relating to your rights under the GDPR, or you require additional information about how we collect, use, share and store your personal information, please contact Truant Pictures's Privacy Officer, using the details set out in paragraph 10.

16. Changes to our Privacy Policy

We may change the way we handle personal information from time to time. If we do so, we will update this Policy and make the updated version available on our websites.

17. Definitions

The below terms have the following meanings in this Policy:

Truant Pictures consists of Truant Pictures Pty Limited, Truant Pictures, LLC and Truant Pictures Pty Limited.

Privacy Law(s) means those laws identified in paragraph 13, and other applicable laws such as the Australian *Spam Act 2007* (Cth).