

ALBION VISUAL

PRIVACY & GDPR POLICY

To comply with the General Data Protection Regulation there may be times when you will be asked to specifically opt in to receiving communication from us and to sharing your data.

Any data collected, including but not limited to, your name, email address, phone number and mailing address are used solely in the provision of Albion Visual services, are stored securely on a purpose-built database and are never shared with any third parties.

In the case of an initial enquiry we will ask for details including your name(s), email address(es), phone number(s) and details of your event date and venue, or desired package. This will enable us to provide a quote and an indication of availability. This information will be stored for an initial period of 6 months in order to respond to enquiries promptly and to best serve potential customers.

In the case of a confirmed booking, as part of the contract between both parties, we will request certain information, including your mailing address and your signature in addition to the above.

As part of carrying out a contract we may also store images of your likeness, both of yourself as signatories and potentially family members, friends, and other guests, depending on the service in the contract. These will be securely stored both as RAW files and JPGs and are stored separately from your full name and other data, the two are never associated.

YOUR RIGHT TO ACCESS

You are able to request, on demand, all data the Albion Visual, as a business, holds on you. This will be provided as an electronic report.

YOUR RIGHT TO BE FORGOTTEN

You have the right to withdraw your consent to have your data stored at any time. If you choose to do this, please email albionvisual@gmail.com stating so.

OUR GDPR POLICY IN FULL:

1. INTRODUCTION

- 1.1 We are committed to safeguarding the privacy of Albion Visual website visitors and customers
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of Albion Visual website visitors and customers
- 1.3 In this policy, “we”, “us”, and “our” refer to Albion Visual

2 HOW WE USE YOUR PERSONAL DATA

2.1 In Section 2 we have set out:

- (a) The general categories of personal data that we process;
- (b) The purposes for which we may process personal data; and
- (c) The legal bases of the processing

2.2 We may process data about your use of our website and services (“usage data”). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency, and pattern of your service use. The source of the usage data is Google Analytics. This usage data may be processed for the purpose of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

2.3 We may process your personal data that is provided as part of an enquiry about our services (“enquiry data”). The enquiry data may include your name, contact telephone number, and email address, for the purpose of offering, marketing, and selling relevant goods and/or services to you. The legal basis for this processing is consent, namely taking steps, at your request, to provide information about our availability and services.

2.4 We may process your personal data that is provided in the course of the use of our services (“service data”). The service data may include your name, contact telephone number, mailing address and email address. The service data may be processed for the purposes of providing our services, maintaining back-ups of our databases, and communicating with you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter such a contract.

2.5 We may process information that you provide for publication on our website or social media (“publication data”). This publication data may be processed for the purposes of enabling such publication and marketing our website and services. The legal basis for this processing is consent.

2.6 We may process information relating to our customer relationships, including customer contact information (“customer relationship data”). The customer relationship data may include your name, your contact details, and information contained in communications between us and you. The customer relationship data may be processed for the purpose of managing our relationships with customers, communicating with customers, keeping records of those communications, and promoting our products and services to customers. The legal basis for this processing is consent.

2.7 We may process information relating to transactions, including purchases of goods and services that you enter into with us (“transaction data”). The transaction data may include your contact details, mailing address and the transaction details of the purchase (i.e. payment details). The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your

request, to enter such a contract, and our legitimate interests, namely the proper administration of our website and business.

2.8 We may process information contained in or relating to any communication that you send to us (“correspondence data”). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using website contact forms. The correspondence data may be processed for the purpose of communicating with you and record keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

2.9 We may process any of your personal data identified in this policy where necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out of court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights, and the legal rights of others.

2.10 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

2.11 In addition to the specific purposes for which we may process your personal data set out in Section 2 of this policy, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interest or the vital interests of another natural person.

2.12 Please do not supply any other person’s details to us unless we prompt you to do so.

3 PROVIDING YOUR PERSONAL DATA TO OTHERS

3.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out of court procedure.

3.2 We may disclose your contact details to our suppliers or subcontractors insofar as reasonably necessary to deliver sub-contracted services or product orders. The legal basis for this processing is consent.

3.3 In addition to the specific disclosures of personal data set out in Section 3 of this policy, we may disclose your personal data, where such disclosure is necessary for the compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in administrative or out of court procedure.

4 TRANSFERS OF YOUR PERSONAL DATA

4.1 In Section 4 of this policy, we provide information about the circumstances in which your personal data may be transferred, including to other countries outside the European Economic Area (EEA).

4.2 The hosting facilities of our website are situated in the UK

4.3 The location of our Image hosting service is situated in Europe. Access to this service will be GDPR compliant.

4.4 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use or misuse of such personal data by others.

5 RETAINING AND DELETING PERSONAL DATA

5.1 Section 5 of this policy sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3 We will retain your personal data as follows:

(a) invoices, contact and contact details will be retained for a maximum period of 6 years (statute of limitations) following final delivery of services

(b) Planning information, wedding or business details and customer notes will be kept for a minimum of one year and maximum of two years following final delivery of services

5.4 Notwithstanding the other provisions for Section 5 of this policy, we may retain your personal information where such retention is necessary for compliance with legal obligations to which we are subject, or in order to protect your vital interest or the vital interest of another natural person.

6 AMENDMENTS

6.1 We may update this policy at any time by publishing a new version on our website.

6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

6.3 We will notify you of any significant changes to this policy by email

7 YOUR RIGHTS

7.1 In Section 7 of this policy we have summarised the rights you have under data protection law. Some of the rights are complex and not all details have been included in our summaries. Accordingly, you should read the relevant laws and guidelines from the regulatory authorities for a full explanation of these rights.

7.2 Your principle rights under data protection law are:

(a) the right to access;

(b) the right to rectification;

- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent

7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. Copies of data will be subject to an administrative charge and additional costs may be subject to a reasonable fee. You can request your personal data by contacting us.

7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

7.5 In some circumstances you have the right to erase personal data without undue delay. Those circumstances include: the personal data no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions to the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise, or defence of legal claims.

7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful, but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise, or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

7.8 You have the right to object to our processing of your personal data for direct marketing purposes including profiling for direct marketing purposes. If you make such an objection, we will cease to process your personal data for this purpose.

7.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

7.10 To the extent that the legal basis for our processing of your personal data is:

(a) consent; or

(b) that the processing is necessary for the performance of a contract to which you are party or to take steps, at your request, prior to entering into a contract.

And such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used, and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

7.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

7.12 You may exercise any of your rights in relation to your personal data by written notice to us.

8 ABOUT COOKIES

8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2 cookies may be either “persistent” cookies or “session” cookies; a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie will expire at the end of the user session, when the web browser is closed.

9 COOKIES THAT WE USE

9.1 We use cookies for the following purposes:

(a) analysis – we use cookies to help us analyse the use and performance of our website and services

10 COOKIES USED BY OUR SERVICE PROVIDERS

10.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

10.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered

relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

11 MANAGING COOKIES

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version.

11.2 Blocking all cookies will have a negative impact on the usability of many websites.

12 OUR DETAILS

12.1 This website is owned and operated by Albion Visual

12.2 Our registered address is 42b Stowe street, Lichfield, England WS13 6AQ.

12.3 You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website contact form;
- (c) by email, using the email address(es) published on our website;
- (d) by telephone, using the telephone number(s) published on our website

13 DATA PROTECTION OFFICER

13.1 Our data protection officer's contact name is: Daniel Burns and can be contacted by email at albionvisual@gmail.com

CUSTOMERS AND EVENT GUESTS CAPTURED IN PHOTOS

Under GDPR legislation, a photograph may in some instances constitute a form of personal data where they can be processed to allow "the unique identification or authentication of a natural person". Albion Visual will never photograph an individual as a means of unique identification or authentication unless consensually contracted to do so. Guests at weddings or other events appear in photos/videos taken by Albion Visual as part of the visual recording of the event. Guests captured in these digital recordings do so as part of the event and their rights are protected by Albion Visual as detailed in this privacy policy.

In terms of explicit GDPR compliance, event customers and guests are photographed/videoed within the parameters of GDPR legislation on the basis of "legitimate interests". The taking of photographs/videos of event guests, when viewed as a form of processing personal data is necessary for the legitimate interests of Albion Visual as a photography and videography business, unless there is a good reason to protect a given individual's personal data which overrides those legitimate interests.

Operating within the parameters of legitimate interests as laid out in the GDPR legislation, the disproportionate effort involved in providing privacy policy information to all guests at the event and the degree to which it would distract us from performing our job renders it infeasible to do. Event clients are therefore requested to direct their guests to read this privacy policy in advance of the event and to advise them to contact us in advance with any concerns around the processing of their personal data, namely being photographed/filmed.

SOCIAL MEDIA POLICY & USAGE

We adopt a safe and responsible Social Media Policy. While we may have official profiles on social media platforms, users are advised to verify the authenticity of such profiles before engaging, or sharing information, with such profiles. We will never ask for personal details on social media platforms. Users are advised to conduct themselves appropriately when engaging with us on social media.

DISPLAY OF IMAGES AND VIDEOS

We may display photographs/videos to promote Albion Visual on our website, social media platforms and blog. We may also display the aforementioned digital files on related blogs, photography websites, in exhibitions, in advertising, brochures, magazines articles and other such marketing material, providing that the images used are used lawfully and without damage to Albion Visual's customers. The rights of people captured in these photographs/videos are protected by Albion Visual as detailed in this privacy policy. Potential customers will be asked to give permission for this as part of the contractual agreement before any work is undertaken.

WITHDRAWAL OF CONSENT

Anyone photographed or filmed by Albion Visual, whether a customer or event guest, and whether past or current, may withdraw consent for a photograph or video in which they appear to be displayed. The process for this is to email Albion Visual at albionvisual@gmail.com and specify the photo or video in question. Pursuant to the request, Albion Visual will then remove the photo or video from online and printed display wherever it appears at the earliest opportunity.