

1. POLICY STATEMENT

1.1 Everyone has rights with regard to the way in which their personal data is handled. During the course of our activities we will collect, store and process personal data relating to our clients and client's clients for our photographic services (Services), and we recognise that the correct and lawful treatment of this personal data will maintain confidence in our organisation and will provide for successful business operations.

1.2 Data users are obliged to comply with this policy when processing personal data on our behalf. Any breach of this policy may result in disciplinary action.

2. ABOUT THIS POLICY 2.1 The types of personal data that Sarah Deane Photographic (We) may be required to handle includes information about current, past and prospective clients and other editorial and media contacts and clients that we communicate with. The personal data, which may be held on paper or on a computer or other media, is subject to certain legal safeguards specified in the Data Protection Act 1998 (the Act), the General Data Protection Regulation (the GDPR) and other regulations.

2.2 This policy and any other documents referred to in it sets out the basis on which we will process any personal data we collect.

2.3 This policy does not form part of any employee's contract of employment and may be amended at any time.

2.4 This policy sets out rules on data protection and the legal conditions that must be satisfied when we obtain, handle, process, transfer and store personal data for the Services.

2.5 Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to Sarah Deane, Owner, Sarah Deane Photographic, Sarah@sarahdeanephotography.co.uk, 07960338357.

3. DEFINITION OF DATA PROTECTION TERMS

3.1 Data is information which is stored electronically, on a computer, or in certain paper based filing systems.

3.2 Data subjects for the purpose of this policy include living journalists, other living editorial and media contacts, clients past and present and all other living individuals about whom we hold personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal information.

3.3 Personal data means data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (for example, a name, address, mobile or date of birth) or it can be an opinion about that person, their actions and behaviour.

3.4 Data controllers are the people who or organisations which determine the purposes for which, and the manner in which, any personal data is processed. They are responsible for establishing practices and policies in line with the Act and the GDPR. We are the data controller of all personal data collected stored and processed for our Services.

3.5 Data users are employees whose work involves processing personal data. Data users must protect the data they handle in accordance with this data protection policy and any applicable data security procedures at all times.

3.6 Data processors include any person or organisation that is not a data user that processes personal data on our behalf and on our instructions. Employees of data controllers are excluded from this definition but it could include suppliers which handle personal data on our behalf.

3.7 Processing is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

3.8 Sensitive personal data includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or about the commission of, or proceedings for, any offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings. Sensitive personal data can only be processed under strict conditions, including a condition requiring the express permission of the person concerned.

3.9 Schedule the schedule at the end of this document summarising data processing activities.

4. DATA PROTECTION PRINCIPLES Anyone processing personal data must (d) Be accurate. (e) Not keep longer than necessary for the purpose. (f) Process in line with data subjects' rights. (g) Keep secure. (h) Not transfer to people or organisations situated in countries without adequate protection.

5. FAIR AND LAWFUL PROCESSING

5.1 The Act and the GDPR are not intended to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the data subject.

5.2 For personal data to be processed lawfully, it must be processed on the basis of one of the legal grounds set out in the Act and the GDPR. These include, among other things, the data subject's consent to the processing, or that the processing is necessary for the performance of a contract with the data subject, for the compliance with a legal obligation to which the data controller is subject, or for the legitimate interest of the data controller or the party to whom the data is disclosed.

5.3 When we collect and process personal data, we do so only in the pursuit of and in accordance with the real and present legitimate interests of our business and taking into consideration the fundamental rights and freedoms of the relevant data subjects, in particular: (a) our collection and processing of personal data is limited to the specific purposes set out above or to any other purposes specifically permitted by the Act or the GDPR; (b) we always endeavour to notify data subjects of our collection and processing of personal data in accordance with this policy; and (c) data subjects have the right to request that we not collect and process their personal data at any time in accordance with this policy.

5.4 When sensitive personal data is being processed, additional conditions must be met. When processing personal data as data controllers in the course of our business, we will ensure that those requirements are met.

6. PROCESSING FOR LIMITED PURPOSES 6.1 In the course of our business, we may collect and process the personal data set out in above. This may include data we receive directly from a data subject (for example, by completing forms or by corresponding with us by mail, phone, email or otherwise) and data we receive from other sources (including, for example, designers, press & PR, business partners and others).

5 6.2 We will only process personal data for the specific purposes set out above or for any other purposes specifically permitted by the Act or the GDPR. We will always endeavour to notify those purposes to the data subject when we first collect the data or as soon as possible thereafter.

7. NOTIFYING DATA SUBJECTS 7.1 If we collect or process personal data, we will always endeavour to inform them about: (a) The source from which we obtained their personal data; (b) The purpose or purposes for which we intend to process that personal data; (c) The types of third parties, if any, with which we will share or to which we will disclose that personal data; and (d) The means, if any, with which data subjects can limit or prevent our use and disclosure of their personal data.

7.2 We will also inform data subjects whose personal data we process that we are the data controller with regard to that data.

8. ADEQUATE, RELEVANT AND NON-EXCESSIVE PROCESSING

We will only collect personal data to the extent that it is required for the specific purpose notified to the data subject.

9. ACCURATE DATA We will ensure that personal data we hold is accurate and kept up to date for returning clients. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

10. TIMELY PROCESSING We will not keep personal data longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy non required data.

12. DATA SECURITY 12.1 We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

12.2 We will put in place organisational and technical measures to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be transferred to a data processor if he agrees to comply with those organisational and technical measures, or if he puts in place adequate measures himself.

12.3 We will maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows: (a) Confidentiality means that only people who are authorised to use the data can access it. (b) Integrity means that personal data should be accurate and suitable for the purpose for which it is processed. (c) Availability means that authorised users should be able to access the data if they need it for authorised purposes. Personal data will normally be stored on our central computer system instead of individual PCs.

12.4 Security procedures include: (a) Entry controls. Sarah Deane Photographic is run from a studio office, I do not employ freelance staff, any intern work experience will not process data. Sarah Deane photographic conducts business meetings in once space and paper data is stored away in a locked case in a private space away from the meeting space. (b) Sarah Deane Photographic has secure lockable desks and cupboards. Desks and cupboards should be kept locked if they hold confidential information of any kind. (Personal information is always considered confidential.) (c) Methods of disposal. Paper documents should be shredded. Digital storage devices should be physically destroyed when they are no longer required. (d) Equipment. Data users must ensure that individual monitors do not show confidential information to visitors to the studio and that they log off from their Mac when it is left unattended.

13. TRANSFERRING PERSONAL DATA TO A COUNTRY OUTSIDE THE EEA 13.1 It is unlikely that we will transfer any personal data we hold to a country outside the European Economic Area (EEA), however if we do it will be provided that one of the following conditions applies: (a) The country to which the personal data are transferred ensures an adequate level of protection for the data subjects' rights and freedoms. (b) The data subject has given his consent. (c) The transfer is necessary for one of the reasons set out in the Act or the GDPR, including the performance of a contract between us and the data subject, or to protect the vital interests of the data subject.

7 (d) The transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims. (e) The transfer is authorised by the relevant data protection authority where we have adduced adequate safeguards with respect to the protection of the data subjects' privacy, their fundamental rights and freedoms, and the exercise of their rights.

14. DISCLOSURE AND SHARING OF PERSONAL INFORMATION

14.2 If we are under a duty to disclose or share a data subject's personal data in order to comply with any legal obligation, or in order to enforce or apply any contract with the data subject or other agreements; or to protect our rights, property, or safety of our employees, customers, or others. This includes exchanging

information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

15. DEALING WITH SUBJECT ACCESS REQUESTS

15.1 Data subjects must make a formal request for information we hold about them. This should be made in writing and we have a dedicated email address for this purpose which is sarah@sarahdeanephotography.

15.2 When receiving telephone enquiries, we will only disclose personal data we hold on our systems if the following conditions are met: (a) We will check the caller's identity to make sure that information is only given to a person who is entitled to it. (b) We will suggest that the caller put their request in writing if we are not sure about the caller's identity and where their identity cannot be checked.

16. CHANGES TO THIS POLICY We reserve the right to change this policy at any time. Where appropriate, we will notify data subjects of those changes by mail or email.

Schedule Data processing activities Sarah Deane Photographic

Category of data subject? Current, former and prospective clients and customers.

What personal data is processed? Name; addresses; telephone numbers; email.

What is the source of the personal data? The data subject or other third-party sources

Who is the information shared with? N/A

Where is the information stored and processed? Within the EEA (UK only).

Purpose/s for processing. Processing orders for services provided by the data controller to the data subject; Maintenance of records of services provided by the data controller to the data subject; Processing of fees for services provided by the data controller to the data subject; Direct marketing; Other purposes directly connected with the data controller's provision of services to the data subject. Retention period. Personal data deleted ten years after the completion of the services provided by the data subject to the data controller.

Category of data subject? Journalists, bloggers and other editorial and media contacts.

What personal data is processed? Name; addresses; telephone numbers; email addresses; employment history; photographs; other information relating to the profession of the data subject.

What is the source of the personal data? The data subject or other third-party sources (including publicly available sources).

Who is the information shared with? Public relations and marketing professionals-clients of Sarah Deane photographic

Where is the information stored and processed? Within the EEA (UK only).

Purpose/s for processing. Licensing or selling all or part of the personal data public relations and marketing professionals, corporate press offices and other third parties.

Retention period. Until: (a) the data subject ceases to be professionally active for a significant period; or (b) the data subject requests the removal of his or her personal data. Legal basis for processing. Article 6(1)(f) – legitimate interests (of the controller and its clients or customers).