



## PRIVACY POLICY

### 1. ABOUT OUR SERVICE

THIS PRIVACY NOTICE IS APPLICABLE TO ANY INDIVIDUALS (ALUMNI) WHO ARE HAVING FREE PROFESSIONAL HEADSHOTS TAKEN AT CANTERBURY CHRIST CHURCH UNIVERSITY (CCCU) GRADUATION/AWARD CEREMONY EVENTS.

JACK PEILOW PHOTOGRAPHY (JPP) COLLECTS AND PROCESSES PERSONAL DATA RELATING TO CCCU ALUMNI IN ORDER TO PROCESS AND SHARE THE PROFESSIONAL HEADSHOTS.

### 2. INFORMATION WE COLLECT ABOUT YOU

JPP COLLECTS THE FOLLOWING DATA:

- YOUR FIRST AND LAST NAME
- YOUR EMAIL ADDRESS
- A SELFIE IMAGE OF YOURSELF

NAMES AND EMAIL ADDRESSES ARE THEN SHARED WITH CCCU WHO WILL RECORD EMAIL ADDRESSES WITHIN THEIR SALESFORCE DATABASE. THEY WILL USE THIS DATA TO CONTACT YOU ABOUT YOUR PHOTOS, AND THEN MOVING FORWARD FOR OTHER MARKETING PURPOSES AS SET IN THEIR ALUMNI PRIVACY NOTICE.

### 3. LEGAL BASIS FOR THE PROCESSING OF YOUR DATA

WE PROCESS INFORMATION ABOUT YOU UNDER THE FOLLOWING LEGAL BASES:

#### LEGITIMATE INTEREST

IN ORDER TO ENSURE GRADUATES RECEIVE THEIR PHOTOS WE NEED TO PROCESS THEIR EMAIL INFORMATION.

THE LEGISLATION RELATING TO PROCESSING DATA UNDER THIS LAWFUL BASIS CAN BE FOUND IN UK GDPR, ARTICLE 6(1)(F):

*(F) PROCESSING IS NECESSARY FOR THE PURPOSES OF THE LEGITIMATE INTERESTS PURSUED BY THE CONTROLLER OR BY A THIRD PARTY EXCEPT WHERE SUCH INTERESTS ARE OVERRIDDEN BY THE INTERESTS OR FUNDAMENTAL RIGHTS AND FREEDOMS OF THE DATA SUBJECT WHICH REQUIRE PROTECTION OF PERSONAL DATA, IN PARTICULAR WHERE THE DATA SUBJECT IS A CHILD."*

THE LEGISLATION RELATING TO PROCESSING DATA UNDER THIS LAWFUL BASIS CAN BE FOUND IN UK GDPR, ARTICLE 6(1)(E):

*(E) PROCESSING IS NECESSARY FOR THE PERFORMANCE OF A TASK CARRIED OUT IN THE PUBLIC INTEREST OR IN THE EXERCISE OF OFFICIAL AUTHORITY VESTED IN THE CONTROLLER."*

### 4. HOW WILL YOUR DATA BE SHARED?

INFORMATION ABOUT YOU WILL BE SHARED WITH CCCU IN ORDER TO PROCESS YOUR PHOTOS AND SEND THEM OUT TO THE GRADUATES. THESE DETAILS WILL THEN BE DELETED BY JPP.

### 5. HOW IS YOUR DATA PROTECTED?

THE DATA WILL BE COLLECTED THROUGH A PASSWORD PROTECTED GOOGLE DOCS FORM AND THEN SHARED THROUGH A PASSWORD PROTECTED SPREADSHEET, WHICH IS THEN DELETED WHEN THE INFORMATION IS TRANSFERRED TO SALESFORCE.

### 6. HOW LONG WILL WE HOLD YOUR DATA

YOUR DATA WILL BE HELD BY JPP FOR NO LONGER THAN 3 MONTHS TO ALLOW FOR THE COMPLETION OF PROCESSES AND DISTRIBUTING THE IMAGES TAKEN AT THE GRADUATION/AWARD CEREMONIES.

### 7. THE DATA PROCESSOR

JPP IS THE DATA PROCESSOR IN THIS INSTANCE AND CANTERBURY CHRIST CHURCH UNIVERSITY IS THE DATA CONTROLLER FOR THIS PERSONAL DATA.

SEE THEIR ALUMNI PRIVACY NOTICE FOR MORE INFORMATION.

### 8. USE OF IMAGERY

THIS SERVICE ALLOWS THE CCCU GRADUATES TO HAVE FREE AND WHOLE USE OF THEIR IMAGES TO BE USED AS THE GRADATES SEE FIT. COPYRIGHT OF THE IMAGERY WILL REMAIN WITH JPP; AS SUCH, IMAGERY TAKEN DURING THIS EVENT MAY BE USED AS PART OF THE MARKETING OF JPP.

AN 'OPT OUT' FORM IS ADDED TO THE PORTAL WEBSITE FOR INDIVIDUALS WHO WISH TO WITHDRAW THEIR IMAGE FROM BEING USED IN THIS WAY.

SHOULD ANY USAGE OUTSIDE OF THE ABOVE-MENTIONED TAKE PLACE, THIS WILL BE DONE AFTER BEING CONFIRMED WITH WRITTEN CONSENT BY THE INDIVIDUAL(S).