

## **Fennell Photography Ltd Privacy Policy**

We respect your privacy and want to provide transparency in the data we collect and use regarding our photographic assignments. We would therefore like to inform you about your rights in managing that information. For that reason, we have revised and updated our Privacy Policy.

The changes we have made in our statement make it more clear what kind of information we hold on file. They derive from the [General Data Protection Regulation](#) (GDPR). The GDPR is a regulation intended to strengthen and unify data protection for everyone within the European Union (EU) as per the 25th of May 2018. We protect the personal information we gather from Fennell Photography users. This involves visitors, registered clients and registered staff members. If you have specific questions or comments about how we use this data, please contact us at [sales@fennell-photography.ie](mailto:sales@fennell-photography.ie) . We're happy to help!

### **Who is the controller your personal data?**

Fennell Photography Ltd ('Fennell Photography') is the controller of the data you submit to us and is responsible for your personal data under applicable data protection law.

*Based at*

*98 Upper Leeson Street, Dublin 4, Ireland D04 W893*

VAT number: IE6398831V

Company Registration Number: 378831

### **Who can access your data?**

The personal data that we collect from you is accessible for employees of Fennell Photography only. We will never share or sell your data with third parties for marketing purposes.

### **What type of personal information do we collect?**

While visitors can use the Fennell Photography website without divulging personal information, when a person contacts us via an email or online form, Fennell Photography will store that information which is voluntarily provided . This involves all data you provide at initial contact by telephone or email including your name, email address, company details and contact telephone numbers. If the assignment is booked details of the shoot participants names and titles where needed are saved. You can have your data updated by contacting us at any time. We process the following categories of personal data:

Name.

Email address.

Employer company.

Mobile phone and landline numbers.

Home Town/county if photographed attending a social event.

In cases where a private individual contacts us to place an order and pay for it personally we do not keep their address or payment details on file, they are deleted once the order has been completed.

We do not share personal data with third parties for commercial or marketing purposes. Where data is shared with third parties, it is done so securely for administration purposes only, in the case of syndication to media on behalf of our clients and at the specific request as part of our contract with them.

### **How do we protect and secure your personal information?**

Fennell Photography is committed to protecting the security of your personal information. However, while we take reasonable precautions to guard the personal information we collect, no security system is impenetrable. We use a variety of appropriate technical and organisational measures and industry standards to protect your personal information and help prevent information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

We store the personal data you provide on protected computer systems that have limited access and are in controlled facilities. Additionally, we ensure that our third-party data back up providers (Keep It Safe and GPS IT Systems) provide adequate security measures. In some instances, in particular but not limited to the online storage of data the personal data that we collect from you may be transferred to and stored at a destination outside the European economic Area (“EEA”) – an example of this is our image hosting partner Imagefile whose service provider data archive exists primarily in Ireland with backups in the United States

We keep personal data taken for administration purposes for as long as necessary for the event and complying with our legal obligations (at least ten years). We keep all digital photographs including any captions taken and relevant metadata taken by us for an indefinite period of time.

You can only access your photographs through direct contact with Fennell Photography, using either an individual user login and password provided or job specific Hyperlink which is only supplied to the booker of the assignment and their designated agents. During transmission over the internet, your data is protected with encryption (HTTPS Certificate SSL. Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

## **Contract**

The relevant data processing is necessary for our contract with clients because we have been asked to take specific steps before entering into a contract. If a customer has made a booking or places an order, we might email them to confirm all details and receive a photographic brief, press release or photo caption and to communicate in general regarding the booking prior to and following the assignment.

## **Legal obligation**

This processing is necessary for us to comply with the law and to provide the service clients have requested of us.

## **Legitimate interests**

The processing is necessary for legitimate interests or the legitimate interests of our clients unless there is a good reason to protect the individual's personal data which overrides those legitimate interests

## **What are your rights?**

We want you to be in control of how Fennell Photography uses your personal data.

### ***Right to access***

You have the right to request a copy of the information held by us about you. We may charge a fee for this which will not exceed €6.35. You also have the right to access your personal data, have changed any inaccuracies in the details we hold about you, the right to object to the use of your personal data and the right to block any specific uses of your personal data by contacting us using the contact details below.

### ***Right to erasure***

You have the right to let us erase any personal data processed by Fennell Photography at any time.

If you would like to use (one of) your rights above, please contact us by sending an email to [sales@fennell-photography.ie](mailto:sales@fennell-photography.ie) with the relevant details.

### ***Right to rectification***

You have the right to request rectification of your personal data if the details are incorrect, including the right to have incomplete personal data completed. It is your responsibility to assure that any information you have provided to us is accurate and up-to-date.

### ***Right to object to processing***

You have the right to object to processing of your personal data that is based on Fennell Photography's legitimate interest. When booking a job with us we rely on you telling us your personal information is complete, accurate and up-to-date. Please inform us promptly of any changes to or inaccuracies of, your personal information (address changes, telephone number, email address etc) by contacting us and sending an email to [sales@fennell-photography.ie](mailto:sales@fennell-photography.ie). If you have been photographed at an event or launch for the purposes of media distribution we will not issue your photographs to the press without your express permission.

### ***Right to object to direct marketing***

You have the right to object to direct marketing, including profiling analysis made for direct marketing purposes. Please take into account that we will always be in contact with you about specific information for an assignment, changes in our privacy policy and any personal data breaches.

### **Cookies**

We may obtain information about your general internet usage by using cookies.

A cookie is a small file sent to your browser from a web server and stored on your device to identify you as the user of the website.

Our website uses cookies to keep track of your access to the site. We may also use cookies to deliver contents specific to your interests.

This website uses cookies for a variety of different purposes. These include those that are "strictly necessary" for technical reasons; those that enable a personalized experience for visitors and registered users; and those that interact with selected third party networks. Some of these cookies may be set when a page is loaded, or when a visitor takes a particular action, such as clicking a "like" button. Below is a description of each category of cookies that are in use, along with specific examples.

**Strictly Necessary** - These are the cookies that are essential for websites to perform their basic functions. These include those required to allow registered users to authenticate and perform account related functions, as well as to save the contents of virtual "carts" on sites that have an e-commerce functionality:

sid - temporary session cookie identifier, used for login sessions

tif\_cem - temporary session cookie for current email, used for secure albums requiring email login

tx1\_EGS - temporary session cookie storing search term for album searches

tx1\_fmm - temporary session cookie allowing viewing desktop site from mobile & vice versa

Unless otherwise noted below, we do not use persistent cookies, nor cookies for optional functionality, AB testing, performance, advertising and so on.

### **Controlling cookies**

Visitors may wish to restrict the use of cookies, or completely prevent them from being set. Most browsers provide for ways to control cookie behaviour such as the length of time they are stored - either through built-in functionality or by utilizing third party plugins.

To find out more on how to manage and delete cookies, visit [aboutcookies.org](http://aboutcookies.org). It's important to note that restricting or disabling the use of cookies can limit the functionality of sites, or prevent them from working correctly at all.

### **Web beacons and other tracking technologies**

Both websites (Fennell Photography and The Image File archive) and HTML e-mails may also contain other tracking technologies such as "web beacons". These are typically small transparent images that provide us with statistics for similar purposes as cookies. They are often used in conjunction with cookies, though they are not stored on your computer in the same way. As a result, if you disable cookies, the web beacons may still load, but their functionality will be restricted.

### **Changes to our Privacy Statement**

Any changes to this Privacy Statement (including the Cookie Policy) will be posted on the Fennell Photography website so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any time we decide to use personal data in a manner significantly different from that stated in this Privacy Statement, or otherwise disclosed to you at the time it was collected, we will notify you by email, and you will have a choice as to whether or not we use your information in the new manner.

Contact Fennell Photography Ltd, 98 Upper Leeson Street, Dublin 4, Ireland.

[sales@fennell-photography.ie](mailto:sales@fennell-photography.ie)