

Privacy Notice for Photography and Filming

1. About this Notice

This privacy notice aims to inform you about how Derwent London plc (“**Derwent, we or us**”) use and share information related to photography and filming, including the types of personal data we collect, how we use it, who we share it with and your rights regarding this data. We will review and update this privacy notice to reflect changes in our activities, as well as to comply with any changes in UK data protection legislation.

2. Contacting us

For the purposes of data protection legislation, Derwent is a “controller” meaning that we determine the purpose and means of processing the information we collect from you. If you ever have any questions, comments or complaints about this notice, or any of its contents, please contact us via any of the following means and we will be pleased to assist you:

David Lawler, Company Secretary

company.secretary@derwentlondon.com

0207 659 3000

3. Information that we collect

Derwent London uses photography, filming and social media to promote our buildings, campaigns and events. The personal data we collect for this purpose predominantly includes:

- Photographs
- Video footage, including interviews

In some cases, we may also collect:

- Your name, address and contact details (email, telephone number and/or postal address)
- The name of the community group, organisation or school that you are part of
- Consent for a child aged 16 or under, or a vulnerable adult - the name of the consentor and their relationship to you

4. How we collect personal information

- Via a consent form (children aged 16 and under and vulnerable adults only)
- Via a film crew or authorised representative e.g., a Derwent London contracted photographer
- During pre-arranged photo opportunities, information is collected by the marketing and communications team and/or by other Derwent London teams/partners/contractors who have a stake in the relevant campaign or event

5. How do we use your information

Derwent London use your information for the following:

- a) Photography and filmed footage may be published on any of the following channels:
 - **Press and media** (including newspapers, magazines, websites and social media)
 - On **our websites**
 - On our **social media** feeds including Twitter, Facebook, YouTube, Vimeo, Instagram and LinkedIn
 - In our **printed publications** such as Derwent London's annual report and accounts
 - In **printed and digital publicity literature** such as leaflets, posters or other display materials
- b) The images/footage will often be accompanied by the details of the story that you, your child/dependent is helping to promote. When known, e.g., at an organised event, this could be the full name, the area, school or club/organisation the event/activity is taking place in
- c) We will only use images/footage that are appropriate
- d) We will not publish images/footage which could imply criticism or damage a person's reputation
- e) We will not film or take photographs of any child that is considered at risk or where consent has not been provided
- f) We will use your image/footage to promote the service(s) or events at which they were taken and for wider related service/event promotion

6. Lawful processing

When we collect and use photos and videos of individuals or small groups where individuals can be identified, we rely on the following lawful basis:

- *Consent*: You or a legal representative have given consent.
- *Legitimate interest*: As set out under Article 6 of UK GDPR - 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.

7. Sharing your information

Where we share your personal data with third parties we ensure that we have appropriate measures in place to safeguard your personal data and to ensure that it is solely used for legitimate purposes in line with this notice. We will always make sure that those third parties protect your personal data in the same way that we do.

We routinely share images with third parties when they are involved in a campaign or event. They include, but are not limited to:

- Public Relations (PR) agencies and creative consultancies
- Real Estate agencies
- Schools and community groups/partners
- Architects, designers and contractors
- Derwent London's internal image management database
- Other key stakeholders (if there is a legitimate business reason)

It is important to note that:

- If your personal information is used on social media that content can be shared by anyone after it is published.
- At no time will your information be passed to organisations external to us and our partners for direct marketing or sales purposes.

8. Where we store and use your information

Photography and film footage is stored on Derwent London's internal image management database. Employees of Derwent London will have access to the image management database and will be able to use the images and footage it contains for the purposes identified in section 5, 'How do we use your personal data'. Our image management database allows us to control access to content through 'access levels' which identifies an images/footage which is restricted.

Social media platforms such as YouTube are hosted outside the EU, your personal data may be transferred to countries that do not have the same level of data protection laws as in the EU. In such cases, we will ensure appropriate safeguards are in place to protect your data, such as using standard contractual clauses approved by the European Commission.

9. Keeping your information

We will not keep personal information for longer than it is necessary, and will only retain information for as long as needed to carry out our functions and that purpose. Personal information is retained in line with our Data Retention Policy and images and film will be reviewed for purpose periodically. Please note that after deletion the information may still appear in materials already in circulation prior to this date.

10. Security

We have put in place measures to protect the security of your information. These measures are intended to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

11. Withdraw consent or opting out

Prior to or during the event

If you're attending a campaign/event at which there may be photography or video recording taking place, you can let us know and we will make every effort not to capture or retain any images or footage of you. If you can, let us know by emailing data.protection@derwentlondon.com stating what event you will be attending and when.

If you've not been able to let us know in advance or have any questions or concerns at a campaign/event, please direct these to the photographer or videographer on site.

Post event

If we have collected your consent or you wish to opt out post event, once photography/filming has taken place you can withdraw your consent/opt out by emailing us with the subject line: 'Withdrawal of consent for photography', stating: your name, the event you attended and date.

Where we are unable to identify you, we may have to ask you to provide a recent photograph to assist us to complete the deletion. This will also be securely disposed of once disposal of photography/film has taken place.

Please note: that although we will stop using your image in current publications we continue to control/digital publications and in any future publications, we will not be able to remove any printed copies which have already been published and are out in the public domain. Withdrawing your consent/opting out will not affect the lawfulness of any processing we conducted prior to your withdrawal.

12. Your rights

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and further rights granted to you under data protection legislation. Under certain circumstances, by law you have the right to:

- Object to processing of your personal information where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. You may further request that your information is deleted if you have objected to its processing.
- Request access to your personal information (commonly known as a "data subject access request"). We will provide a copy of the personal information we hold about you.
- Request correction of the personal information that we hold about you. Whilst we endeavour to keep our records up to date and accurate, your assistance in their accuracy is always appreciated.
- Request erasure of your personal information. This enables you to ask us to delete or remove your personal information. However, as noted in this notice, you may not be able to access certain services or your engagement with us may be terminated if it is a requirement to have this information.

- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party in a machine-readable, commonly used and structured format. To exercise any of the above rights, please contact us at the details provided above. The various rights are not absolute and each is subject to certain exceptions or qualifications.

13. Right to complain

If you wish to request further information about any of the above rights, or if you are unhappy with how we have handled your information, contact us at the details above. If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office ("ICO") via its website (<https://ico.org.uk>)

14. Changes to our Privacy Notice

We keep our notice under regular review in order to ensure that it properly reflects our use of personal data. This notice was last updated on 31 July 2023. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.