

Privacy Notice – Photography & Videography

1. Introduction

This Privacy Notice explains how we use photographs and film, our lawful bases for processing, relevant retention periods, and how you can exercise your privacy rights.

This Privacy Notice provides information which is in addition to any photography and film privacy notices, consent forms and signage which may have been in place at the time photography / filming took place.

2. What is the purpose of this document?

LTE Group (“we”, “our”, “us”), is committed to protecting the privacy and security of your personal information (“**personal data**”). This Privacy Notice describes how we collect and use personal information about you in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (the “**GDPR**”), together with other UK data protection laws.

Our Data Protection Policy, as well as more information on how we process personal data, can be found at: <https://www.ltegroup.co.uk/dataprotection/> You can also contact our Data Protection team at dpo@ltegroup.co.uk if you have any questions regarding this document.

It is important that you read this Privacy Notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing information about you, so that you are aware of how and why we are using your personal data and what your legal rights are in relation to it.

3. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

The categories of personal information that we may collect, store, and use about you may include:

Photographs and film footage	✓
Name and contact details	✓
Course of study	✓
Testimonials, quotes and case studies	✓

4. How do I know if photography is taking place?

Wherever possible, we will ensure you know when photography or videography is taking place in the following ways:

- Advance notice of our intention to photograph / film within event booking forms, event invitations, event information etc.
- Comprehensive signage at prominent locations, entry and exit points to the event
- Our photographers / videographers will be clearly identifiable and approachable during the event
- Our photographers / videographers will approach clearly visible and identifiable individuals to verbally inform that a photograph / film has been taken

5. How will we use information about you?

From time to time, photographs and videos are taken on and off campus for marketing, educational and promotional purposes. These images could be used in print and digital media formats including, publications, websites, e-marketing, poster banners, advertising, film, social media, teaching and research purposes, etc. We do this to help showcase the work we do as an education provider and to support what our students are achieving.

6. Our lawful bases for processing

Data protection laws require us to meet certain conditions before we are allowed to use your personal data in the manner described in this Privacy Notice, including having a "lawful basis" for the processing.

Some of the below grounds for processing will overlap and there may be several grounds which justify our use of your personal information. We may process your personal information without your knowledge or consent where this is required or permitted by law.

Lawful Basis	
Legitimate interests	<ul style="list-style-type: none">• We have a legitimate interest to be able to promote LTE Group using photography / videography, as explained above• We make every effort to ensure you are aware when photography / filming is taking place and to minimise any privacy impact• You are able to opt out of photography / filming as explained below
Consent	<ul style="list-style-type: none">• Where appropriate, we may seek your consent to photograph / film you• This will be done via the initial consent gathering process for students, or with specific consent forms, either electronic or paper-based
Legal or contractual obligation	<ul style="list-style-type: none">• We will rely on this lawful basis where we need to take your photograph to comply with our legal or contractual requirements, such as taking photographs for identification cards, for matters under health and safety legislation, or as part of a programme of study

Withdrawing your consent or opting out

Prior to or during the event

If you are attending an organised event at which there may be photography or video recording taking place, our event booking form will ask whether you wish to opt out of photography. Please use this option at the point of booking. You can also let us know by contacting: dpo@ltegroup.co.uk stating which event you will be attending and when. For large events such as open days and graduation etc, we may provide you with a badge, armband, lanyard, or other discreet identifier, so our event photographer is aware that you have opted out. We will make every effort not to capture or retain any images or footage of you.

If you have not been able to let us know in advance or have any questions or concerns at an event, please direct these to the photographer or videographer on site. We will ensure that the event photographer will be clearly identifiable.

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 writing to dpo@ltegroup.co.uk, 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, 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. This may also include any images already shared with our event partners (where relevant). Withdrawing your consent / opting out will not affect the lawfulness of any processing we conducted prior to your withdrawal.

7. Data sharing

Any consent form obtained will not be shared. The images and film we take will likely be placed into the public domain. This includes within our internal and external publications, printed media, prospectuses, on our websites, social media accounts, billboards / hoardings and other public domain advertising, and within adverts placed with specific third parties, (e.g. Google, Facebook and Instagram).

As such, published photographs / film are available to anyone who has access to the internet, social media channels or printed materials etc in which the photo(s) or video(s) feature.

The original photographs and videos will only be accessible to approved employees and agents of LTE Group, or third parties that process data on our behalf (e.g. printing providers, digital asset management suppliers).

On some occasions, images may be shared with our trusted event partners.

Information on how we handle disclosure requests, for example from law enforcement bodies for crime prevention and investigation purposes, can be found here: [LTE Group and Disclosure requests](#).

8. Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for. Details of retention periods are available in our [Records Management Policy](#) and [Data Retention Schedule](#) (also available on request from dpo@ltegroup.co.uk). Where images have been shared with our event partners, their own retention periods will also apply.

Where we have collected your consent to use your image, the consent form used will have contained a specific retention period (typically five years), after which we will dispose of the photography / film or seek to refresh your consent. We will seek to refresh your consent using the contact information provided within the consent form.

Where such a consent form has not been used, we will use and retain photography / film for a period of five years from the date of the event, at which point we will dispose of the photography / film. Please note that after deletion the information may still appear in materials already in circulation prior to this date.

9. Your individual rights in connection with personal data

Subject to certain conditions, you have the following rights in relation to your personal data:

Access to your personal information (known as the Right of Access/ a Subject Access Request)

Rectification of the personal information we hold about you if it is inaccurate

Erasure/Deletion of your personal information (in certain circumstances)

To be Informed about the processing your personal information

Restriction of processing of your personal information

Transfer of your personal information to another party

Objection to processing of your personal information

Suspension of processing of your personal information

If you wish to invoke any of the above rights, please contact us via email:

dpo@ltegroup.co.uk.

Further guidance on your rights is available from the Information Commissioner's Office (<https://ico.org.uk/>).

10. If you are unhappy with how we have handled your data

If you are unhappy with how we have handled your data, you may lodge a formal complaint with the following department:

LTE Group Data Protection Officer
Whitworth House
Ashton Old Road
Manchester
M11 2WH

dpo@ltegroup.co.uk

If you do not wish to discuss your complaint with us, or you are unhappy with our response, you also have the right to lodge a complaint with a supervisory authority, the Information Commissioner's Office (ICO).

Further information is available on the ICO website, or via the telephone:

<https://ico.org.uk/global/contact-us/>
0303 123 1113

More information on the ICO's complaint procedure can be accessed at:
<https://ico.org.uk/make-a-complaint/>