**PRIVACY POLICY – JULY 2022**

ITLT Photography Ltd is committed to protecting and respecting the personal data that we hold. This privacy statement describes why and how we collect and use personal data and provides information about individuals’ rights.

It applies to personal data provided to us, both by individuals themselves or by others on behalf of individuals. We may use personal data provided to us for the purposes described in this privacy statement or as made clear in another form before collecting personal data.

ITLT Photography Ltd address is 47 Arkley Court, Maidenhead SL6 2YR.

ITLT Photography Ltd website is [www.itlt.co.uk](http://www.itlt.co.uk) and is owned and operated by ITLT Photography Ltd.

**PERSONAL DATA**

Under the [General Data Protection Regulation (Regulation (EU) 2016/679)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN) (‘GDPR’) and [Data Protection Act 2018](http://www.legislation.gov.uk/ukpga) (‘the Act’), personal data is defined as ‘any information relating to an identified or identifiable natural person (‘data subject’), by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person’.

When collecting and using personal data, our policy is to be transparent about why and how we process personal data.

We process personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose differ, and are set out in the relevant sections below.

The personal data that is provided to us is provided either directly from the individual concerned, from a third party acting on behalf of an individual, or from publicly available sources (such as internet searches, and Companies House).

**THE DATA CONTROLLER**

A data controller is the individual or legal person who controls and is responsible to keep and use personal data in paper or electronic files. ITLT Photography Ltd is the data controller as defined by relevant data protection laws and regulation.

**LAWFUL PROCESSING**

The lawful bases for processing are set out in Article 6 of the GDPR. At least one of these must apply whenever personal data is to be processed:

(a) Consent: you have given ITLT Photography Ltd (e.g. any of the following depending on the situation freely, specific, informed or unambiguous) consent for your personal data to be processed for a specific purpose.

(b) Contract performance: the processing is necessary for the performance of a contract you have with ITLT Photography Ltd, which had asked you to take specific steps before entering into a contract.

(c) Compliance with legal obligation: the processing is necessary for ITLT Photography Ltd to comply with the law (e.g. the tax/social security obligation/employment law) (not including contractual obligations).

(d) Protection of vital interests: the processing is vital to an individual’s survival.

(e) Public interest: the processing is necessary for ITLT Photography Ltd to perform a task that is in the public interest or for its official functions, and the task or function has a clear basis in law.

(f) Legitimate interests: the processing is necessary for ITLT Photography Ltd legitimate interests, or the legitimate interests of a third-party, unless there is a good reason to protect the individual’s personal data that overrides those legitimate interests.

**DATA RIGHTS**

Your data subject rights are listed below:

* the right of access.
* the right to rectification.
* the right to erasure or right to be forgotten.
* the right to restriction of processing.
* the right to be informed.
* the right to data portability.
* the right to object.
* the right not to be subject to a decision based solely on automated processing.

Under the GDPR and the Act, you may ask for a copy of the information we hold about you and you may request rectifications be made to this information if it is inaccurate or not up to date.

To exercise any of the above rights, please write to:

**ITLT Photography Ltd**
**47 Arkley Court**

**Maidenhead**

**SL6 2YR**

Email: samantha.cloete@itlt.co.uk

Phone: 07595338940

**DATA THAT WE HOLD**

We provide services to individuals as well as businesses, non-profits, and other organisations. The exact data held will depend on the services to be provided.

Where we engage with clients for professional services, we may collect and process personal data in order to satisfy a contractual obligation. We request that clients only provide the personal data that is required for us to fulfil our contractual obligation.

**Why do we process data?**

Where data is collected for professional services, it is used for a number of purposes, such as;

* Providing services to clients – data is processed in order to provide the service detailed in our letter of engagement between our clients and us, and may sometimes be further clarified in written documentation supplied before any data processing may occur;
* Client management – when communicating with and assessing the needs of clients, personal data may be processed in order to ensure that their needs are appropriately satisfied. This may include assessing whether the right collection of services is being provided to our clients;
* Administration – in order to manage and administer our business and services, we may collect and process personal data. This may include (but is not limited to) maintaining internal business records, managing client relationships, hosting events, administering client facing applications, and maintaining internal operating processes; and

**What data is processed?**

Personal data from our contacts, which covers both potential and prior customers.

**Why do we process data?**

Where personal data on business contacts is held, it is used for the following purposes:

* Delivery of services to our customers
* Promotion and development of our offerings
* Communication of package updates
* Managing of our relationships and
* Administration and management.

**What data do we hold?**

**Customers**

Personal data that may be stored includes, but is not limited to, names, contact telephone numbers, e-mail addresses and physical addresses.

**People who use our website, mobile apps, and other means**

When people visit our website, mobile apps, and other means, personal data is collected both through automated tracking and interactions with various forms on the website or apps (collectively referred to as the websites).

Personal data may also be collected when individuals contact us by phone, e-mail or otherwise. This includes information provided when an individual registers to use our website, subscribes to our newsletter, makes an enquiry, or reports a problem with our websites.

When individuals visit our websites, certain personal data may be automatically collected.

**Why do we process data?**

There are several reasons why we will process the personal data that an individual may provide to us when visiting our websites. For examples, these include:

* Administration – to administer our website and to improve internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. For example, we use this data to ensure that the website is presented well for individuals and is optimised appropriately;
* Functionality – in order to allow individuals to use some functionality of our website, certain personal data must be entered in order for features to work as intended;
* Security – in order to keep our website safe and secure, we may sometimes collect personal data, for instance login information and other data that can be used to vouch an individual’s identity.

**What data do we hold?**

The data that we hold depends on what data was entered and for what purpose.

Where data was entered in order to engage with functionality of our website, that personal data may include names, addresses, e-mail addresses and phone numbers, financial and credit card information, personal description and photographs.

Our website uses cookies to distinguish individuals from one another. This helps us to provide a better experience when individuals browse our website and, also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our **Cookie Policy**.

**SHARING PERSONAL DATA**

We may disclose your personal data to third parties when we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any agreements, or to protect the rights, property, or safety of the organisation, or other individuals.

**THIRD PARTY WEBSITES**

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

**LOCATIONS OF PROCESSING**

The data that we collect from you will be processed at our servers in the EEA.

**SECURITY OF YOUR INFORMATION**

To help protect the privacy of data and personally identifiable information you transmit through use of this our website, we maintain physical, technical and administrative safeguards.

**HOW LONG WE STORE YOUR PERSONAL DATA FOR**

We retain the personal data processed by us for as long as is considered necessary for the purpose(s) for which it was collected.

**COMPLAINTS**

For further information on your rights and how to complain to the ICO, please refer to the ICO website <https://ico.org.uk/concerns>

**Data controller and contact information**

The data controller for ITLT Photography Ltd registered in England under registration no. 14019196 and with its registration address at 47 Arkley Court, Maidenhead SL6 2YR.

If you have any questions about this privacy statement or how and why we process personal data, please contact us at:

**ITLT Photography Ltd**
**47 Arkley Court**

**Maidenhead**

**SL6 2YR**

Email: samantha.cloete@itlt.co.uk

Phone: 07595338940