

# **PRIVACY STATEMENT**

This privacy statement explains what personal data are processed at IMAGES International Photography Club, for what purpose, when, in which way, for how long and by whom. In the remainder of this privacy statement our "IMAGES photography club" and the "IMAGES committee" will be collectively referred to as "IMAGES".

Should you have any questions about this privacy statement, please contact IMAGES: <u>general@imagesphotoclub.com</u>

#### Personal Data

'Personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular 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.

### What personal data do we collect about you?

The minimum personal data we need from you to register you as a club member is your first name, surname and email address.

We collect specific personal data on you:

1. when you register to become a member of IMAGES, either by:

(a) sending IMAGES a request for membership through the email program on the "Contact Us page" on the IMAGES website,

- (b) sending IMAGES a request for membership through email via your email software, or
- (c) providing your personal data for membership on paper or in digital format at an event.
- 2. when you work with us in a commercial capacity, either as a sponsor, speaker, web host
- 3. when you use the website through cookies
- 4. if you complete your details on research questionnaires, and
- 5. when you enter competitions organized by IMAGES such as, but not limited to, "Photo of the Year" and "Photographer of the Year", these "<u>POTY competition rules</u>" apply.

### What is the purpose of using personal data about you?

At IMAGES we collect different types of personal data about our users for six main reasons:

- 1. To help us to (de-)register club members.
- 2. To help us with financial administrative processing of payments for club membership.
- 3. To help us with financial administrative processing of contracts for external speakers, external parties providing a meeting room location & facilities, web hosting of the IMAGES website.



- 4. To help us to monitor and improve the user-experience of the IMAGES website.
- 5. To help us to keep the registered members informed about past, current and future events through the IMAGES website, email distribution lists and social media platforms such as Twitter, Facebook and Instagram.
- 6. To help us attribute photo materials, blogs and news events provided by our members for publication on the IMAGES website, external websites, social media platforms or at exhibitions.

## How do we process personal data about you?

- The protection of your privacy and personal data is important to us. We make sure we have appropriate organizational and technical security measures in place, as indicated in the section "Security" of <u>the Privacy Statement of Neostrada</u>, our web host.
- 2. We will make it clear at the point when we request your personal data, what we are collecting the data for and how we are going to use the data.
- 3. We will collect and use your personal data only if we have your permission or we have sensible reasons for doing so, such as collecting enough information to manage your subscriptions.
- 4. We will minimise the amount of personal data we collect from you to what we need as mentioned under 'Purpose'.
- 5. We will be clear with you as to what data about you we will collect and how we will use the data.
- 6. We will use personal data only for the purposes for which the data were originally collected and we will make sure we delete the data securely after a retention period.
- 7. Our IMAGES website is accessible via the internet. Please remember that if you post any footage or links on our site, through our webmasters, then that information can be read and accessed by anyone and everyone.

### What legal bases do we use for processing your personal data?

We use different legal bases depending upon the purpose for collecting your data in the first instance.

For all data collected to (de-)register club members, financial administrative processing, monitor and improve the user-experience of website visitors, keep members up-to-date about past, current and future events, or attribution of materials shared, we process the data using Legitimate Interest.

Under the terms of current data protection legislation, we will always make it as easy as possible for you to opt out of unwanted processing, providing it does not restrict our ability to provide you with the functionality or service you have requested.

### How long do we hold on to your personal data?

Because we collect data for a wide range of purposes, we do not have a singularly defined retention period. For each individual data item, we define a carefully assessed timeframe within which we retain your data.

After this, data are managed to ensure that they are either erased from our system, minimised and retained for legal reasons or pseudonymised and retained.



Purpose	Which personal data	Legitimate basis	Retention period	Data processor(s)
Membership records	first name surname mobile telephone number email address bank account number	Annual contribution of members to the IMAGES photography club. Or, if a member joins after a period x, the corrected contributions for the remaining part of the year.	For the duration of the membership; Financial records will be held for a period of 10 years.	IMAGES Treasurer
Financial audit	first name surname mobile telephone number email address bank account number financial contract bill of materials	Independent financial audit	Financial records will be held for a period of 10 years.	Audit by person other than IMAGES Treasurer
Communications between members	first name surname address mobile telephone number email address	Communications between members	For the duration of the membership	Members of IMAGES
Communications for inviting external speakers	first name surname mobile telephone number email address bank account number financial contract	In line with membership agreement to provide service to members	For the duration of the membership; afterwards refer to public websites of external speakers; Financial records will be held for a period of 10 years.	Members of IMAGES
Communications with web hosting company	first name surname mobile telephone number email address bank account number financial contract	In line with membership agreement to provide service to members	For the duration of the contract; Financial records will be held for a period of 10 years.	IMAGES Treasurer IMAGES Webmasters
Materials such as photos, videos, blogs	Photos, videos, blogs first name surname profile photo of member Use of pCloud software to transfer materials to a cloud storage space requires an email address	When you participate in competitions, events or publish materials on IMAGES website, other websites, social media and expositions, you do this on the basis of consent. Attributions, including first name and surname, will be added to the published materials, see <u>rules</u> .	As long as the consent has not been withdrawn by the provider of the materials.	Members of IMAGES Publishing of materials with attributions on IMAGES website: IMAGES Webmasters
Informing members (e.g. events, changes in privacy statement, etc)	first name surname address mobile telephone number email address	In line with membership agreement to provide service to members	For the duration of the membership	IMAGES Chair IMAGES Secretary IMAGES Treasurer IMAGES Webmasters
Approaching de- registered members (e.g. for a reunion)	first name surname email address	Consent	As long as the consent has not been withdrawn by the de- registered member	



# Updating your personal data

Under current data privacy legislation, you have the right to rectify, erase or restrict the processing of your data without undue delay. You may also request access to the data we hold on you. To do this or to update your personal data at any time, please contact IMAGES: <u>general@imagesphotoclub.com</u>

### Who we share data with

- 1. We will not share your personal data with others for marketing or advertising purposes.
- 2. We make other organisations' services available through the IMAGES website (i.e. Facebook public page and Twitter), but the data that these organisations collect are governed by their own privacy statements.
- 3. Instagram is another social media channel, which is currently not running on the IMAGES website. It may also collect data governed by its own privacy statement.
- 4. We can access and release personal data to keep to relevant laws and government requests, to operate our systems properly and to protect both us and our users.

### Use of Cookies

We use cookies for a number of reasons.

For statistical purposes to track how many users we have and how often they visit the IMAGES website. We collect information listing which of our pages are most frequently visited and from which countries.

You can turn cookies off, but if you do this, you may experience a lower user-experience when interacting with (parts of) the IMAGES website.

### **Google Analytics**

We use Google Analytics on the IMAGES website for anonymous reporting of site usage. If you would like to opt-out of Google Analytics monitoring your behaviour on the IMAGES website, please use this link <u>https://tools.google.com/dlpage/gaoptout</u>

### More information on Cookies

Please refer to our Cookie Privacy Notice on the IMAGES website for more details, see: <a href="http://imagesphotoclub.com/cookie-privacy-policy/">http://imagesphotoclub.com/cookie-privacy-policy/</a>

### Legal information and how to contact us

Under the General Data Protection Regulation in effect as of May 25<sup>th</sup> 2018, we have to say who the 'data controller' is for the IMAGES website.

If you would like access to or a copy of the personal data we hold about you, to request a correction, or have any questions about how we may use the data or to make a complaint, please contact IMAGES: <u>general@imagesphotoclub.com</u>

Requests will be dealt with by the Chair with technical support of IMAGES' webmasters, and will be responded to within a reasonable period, not longer than 30 days.

### Changes to the privacy statement

If we make changes to our privacy statement we will show you what they are here. If these changes are significant, we may also choose to email relevant individuals with new details. If we are required by law, we will obtain your consent to make these changes.

Changes to this privacy statement by date

December 2018 – New IMAGES privacy statement created.

