



Privacy Policy 2018 (2019 Update)

In very basic terms Petite Portraits Photography totally respects your personal information and will only ask you for what information we really need from you. We will look after it in the same way we would want ours looking after, keeping it secure! We will only share it with others where we need their help us deliver our service to you (such as our professional printing laboratory who may need your name and address to post your purchases). Be assured that we will never share your information in any other circumstances – nor will we sell it on elsewhere! Here are more details -

Introduction

Petite Portraits takes your privacy very seriously. This privacy policy has been prepared in line with the EU's General Data Protection Regulation (GDPR), which promotes fairness and transparency for all individuals in respect of their personal data. This privacy policy applies to all data we process, and by using Petite Portraits you consent to our collection and use of such data. If you would like to get in touch about anything in this policy or about your personal data then please contact Becky Tansley, our Data Protection Officer at petite.portraits.photography@gmail.com

1. The Data we collect

As a data controller, Petite Portraits collect a variety of data in order to deliver our services, and we will manage your personal data transparently, fairly and securely.

If using our website, you will be asked to acknowledge it's use of cookies which collect data. Petite Portraits does not have access to the data collected as this data is used and held by our host, [wix.com](https://www.wix.com). You may view their privacy policy to ascertain what data they collect and how they use it online at <https://www.wix.com/about/privacy>

We may ask you to provide us the following data if you fill in a contact form on our website or make a booking via our online booking system, hosted by Acuity Scheduling, or send us an enquiry email via our gmail host, if relevant to the photo shoot service you wish us to provide–

- First and Last Name;
- Contact telephone number;
- Contact email address;
- Home Address including postcode;

- Approximate date required for Photo Shoot;
- Names of all participants;
- Ages of all participating children;
- Dress sizes of participants (in the event that outfits are to be provided by the Photographer)
- Baby's Due Date or Date of Birth (Newborn Bookings only);
- Number of weeks into pregnancy (Maternity Bookings only);
- Type of Photo Shoot Photographer's Service required;

In case of Newborn bookings, when notifying us that your baby has been born, you will be also be asked to provide the following information via an online questionnaire, hosted by our secure studio software, 17hats, to help the Photographer to assess the best age to photograph baby on and the props/set ups and poses to use for best results (you may choose to withhold any of this information if you so wish):

- Number of days old on the date of notification;
- Date of Birth;
- If baby was breech (as this can affect poses attempted)
- If you had a C. Section (as this may affect your ability to act as a spotter or pose with baby)
- Feeding method;
- If a dummy is allowed to be used by baby during the Photo Shoot (to be supplied by parents);
- How many days premature baby was if applicable;
- Birth Weight;
- Any medical issues which may affect the poses that are attempted
- Reconfirmation of If you require parent and/or sibling photographs to be taken to ensure model releases and consents are ready prior to your shoot.

We will record a date of birth for all persons we photograph under the age of 13 and require the parent or a legal guardian to consent to photography.

Obviously being a photographic business we also create and manage images as per our contractual agreement(s) and those images are also classed as data.

2. Why we need this Data

We need the data we request from you in order to provide you with our photography services in accordance with our contract or to tell you about relevant services that we could also provide you with. We will not collect any personal data from you that we do not need in order to provide and oversee this service to you.

3. Where do we keep your Data?

All the personal data you complete on an online form for us or provide to us in other ways, such as verbally, is automatically transferred onto our 17hats studio management software and a Client Record is created under your name. This information is processed by our staff in the UK however for the purposes of IT hosting and maintenance this information is located on servers within the European Union and the USA. Your name and email address will also be added onto

our mailing list which is held online by Mail Chimp. You may unsubscribe from this mailing list at anytime by clicking the unsubscribe link on any email we send you.

If you book an Enchanted photo shoot, your data will also be stored as a Client Record on the Acuity Scheduling host that we use to allow you to book online.

If using our website, you will be asked to acknowledge it's use of cookies which collect data. Petite Portraits does not have access to the data collected as this data is kept by our host, [wix.com](https://www.wix.com). You may view their privacy policy to ascertain how they use it online at <https://www.wix.com/about/privacy>

When you place a print or product order with us, some of your personal details and the content of your order will be recorded onto a paper order form. This order form will be scanned and uploaded onto your client record on 17hats and the paper form shredded once your order is fulfilled. In the interim it will be stored in a locked studio and a locked file.

The images we create for you will be stored on our own hard drives in the studio, which are password protected and also on our back-up server hosted by Crashplan Code 42, an EU, cloud based secure server. Until your images are fully edited, we also keep a hard copy on the SDHC cards which will be stored in a locked file to protect your RAW files from loss due to a systems failure.

If you give consent for us to use your images on our website and social media accounts (e.g Facebook and Instagram) for marketing purposes, your images will be kept indefinitely on our studio hard drives and on the servers upon which our web host and 3rd party social media host utilise for the period of time that they feature on those sites. You have the right to withdraw your consent for us to use your images at any time, at which point we will remove them from the relevant site within one month of your notifying us of your consent withdrawal. We will ask every client if they wish to give us their consent to use their images for marketing purposes when they sign their booking form/ contract with us.

No 3rd parties have access to your personal data unless the law or our contract or consent agreement with you, allows them to do so, with the exception of our accountant who has to be given access to orders placed with the studio if required and as such, they will see your names and contact number which is featured on the order form to identify your order.

3. How we use that Data

We use aspects of the above data to:

- Fulfil our contractual obligations to you for the provision of the booked photography service and consequent physical prints and products which your order from us
- To create your email secured digital galleries for your Viewing and Ordering Session at the studio
- To enhance and personalise your user experience of our services
- To post your order or relevant letters out to your home address

- To provide correctly sized costumes to participants of sessions
- For marketing purposes, when you provide us with your email address we will add your name and email address onto our mailing list database, held by MailChimp. This is done under the 'soft opt in' which assumes that by contacting us for a photo shoot, that you may wish to be kept up to date with information relating to photoshoots by the studio. We will not spam you with emails as we would not like someone else to do that to us either. So we will only contact you when we feel there is relevant information that you might like to know about. Every email you receive from us, via Mail Chimp, also gives you the option to remove yourself from the mailing list by unsubscribing and should you choose to do so, we will not contact you again.
- To fulfil our legal obligations under tax legislation and Copyright Law.
- If we are asked to provide your personal data to law enforcement and they have the necessary permissions to take such data from us, we will use your data to comply with their requests and supply what is requested.

We collect this data on the following lawful basis:

- by asking for your consent
- to arrange and fulfil the contract between us
- to meet legal obligations other than the contract

When you visit our website our host, [wix.com](https://www.wix.com) also collect Cookies. These are small pieces of data that websites send to a user's computer and are stored on the user's web browser. They are designed to enable the website to remember information, and to help the website run smoothly. Although we do not have access to this data it is used to:

- personalise your experience
- deliver our services to you

4. Which third parties do we share Personal Data with?

We share personal data with the following third parties:

Print Laboratories: Data is not transferred outside of the European Economic Area.

Album Supplier: Data is not transferred outside of the European Economic Area.

Web Host, [wix.com](https://www.wix.com): Data is transferred outside of the European Economic Area to United States under the protection of EU/US Privacy Shield.

Online Booking Host, Acuity Scheduling: Data is transferred outside of the European Economic Area to United States under the protection of EU/US Privacy Shield.

Lindrick Accountancy Service: Data is not transferred outside of the European Economic Area.

Management Software Host, 17hats: Data is transferred outside of the European Economic Area to United States under the protection of EU/US Privacy Shield.

Mail Chimp: Data is transferred outside of the European Economic Area to United States under the protection of EU/Swiss Privacy Shield.

Stripe Payment Gateway: Data is transferred outside of the European Economic Area to United States under the protection of EU/US Privacy Shield.

Paypal Payment Gateway: Data is transferred outside of the European Economic Area to United States under the protection of EU/US Privacy Shield.

Sum Up Payment Gateway: Data is transferred outside of the European Economic Area to United States under the protection of EU/US Privacy Shield.

World Pay Zinc Payment Gateway: Data is transferred outside of the European Economic Area to United States under the protection of EU/US Privacy Shield.

Google: Data is transferred outside of the European Economic Area to United States under the protection of EU/US Privacy Shield.

Code 42 Back Up Providers: Data is transferred outside of the European Economic Area to United States under the protection of EU/US Privacy Shield.

Facebook: Data is transferred outside of the European Economic Area to United States under the protection of EU/US Privacy Shield.

Instagram: Data is transferred outside of the European Economic Area to United States under the protection of EU/US Privacy Shield.

ShootProof Gallery Hosts: Data is transferred outside of the European Economic Area to United States under the protection of EU/US Privacy Shield.

Wetransfer: Data is transferred outside of the European Economic Area to United States under the protection of EU/US Privacy Shield.

Animoto: Data is transferred outside of the European Economic Area to United States under the protection of EU/US Privacy Shield.

There are also certain situations in which we may share access to your personal data without your explicit consent; for example, if required by law, to protect the life of an individual, or to comply with any valid legal process, government request, rule or regulation.

5. Why do we share your Personal Data with the above?

We share your data in order to:

- to arrange and fulfil the contract between us
- to meet legal obligations other than the contract
- personalise your experience
- deliver our services to you
- for marketing purposes, where consent allows us to do so
- to display your finished images to you

We may transfer personal data to a country outside of the European Economic Area (EEA) if necessary, eg. if a third party we utilise has servers located outside of the EEA. If this is the case, we will ensure that the transfer is legal and your data is secure by the EU's guidelines and/or Privacy Shield . You can see above where we send data outside of the EEA and on what basis we do so.

6. How do we keep your personal data secure?

We keep your data secure by following internal policies of best practice, locked stage of all paper based information, password protection of all our computers and hard drives, encryption and by using Secure Socket Layer (SSL) technology when information is submitted to us online.

We have also sought clarification from our 3rd party hosts that their services are certified under the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework and therefore adheres to the Privacy Shield Principles or conform to GDPR legislation.

Our back up servers, based with Code 42 also encrypt your images at rest and in transit to keep them secure.

In the unlikely event of a criminal breach of our security we will inform the relevant regulatory body within 72 hours and, if your personal data was involved in the breach, we will also inform you.

7. Changes to our privacy policy and control

We may change this privacy policy from time to time. When we do, we will let you know by changing the date on this policy, notifying customers of only significant changes. By continuing to access or use our services after those changes become effective, you agree to be bound by the revised privacy policy.

8. You have the following rights -

- the right to be informed about the collection and use of your personal data
- the right of access to your personal data and any supplementary information
- the right to have any errors in your personal data rectified
- the right to have your personal data erased
- the right to block or suppressing the processing of your personal data
- the right to move, copy or transfer your personal data from one IT environment to another
- the right to object to processing of your personal data in certain circumstances, and
- rights related to automated decision-making (i.e. where no humans are involved) and profiling (i.e. where certain personal data is processed to evaluate an individual).
- the right to remove your details from our Mail Chimp mailing list.

If you wish to exercise any of these rights, your point of contact is Becky Tansley, the Data Controller for Petite Portraits. You may contact her at any time using the following methods:

- Email Becky with your requests at: petite.portraits.photography@gmail.com
- Or by writing to us: Becky Tansley, Petite Portraits, Studio 6 Flexspace, Off Nobel Way, Dinnington, Sheffield, S25 3QB

We kindly request that you do not make request of this nature verbally as we need to be accountable and have written records relating to your request.

9. How long do we keep your data for?

While we do not hold personal data any longer than we need to. The duration will depend on your relationship with us, and whether it is ongoing. We may keep some of your personal data for up to 7 years after our working contract with you has finished for Tax legislation purposes.

We also archive a copy of your purchased images as .jpg files indefinitely along with your relevant details and consent forms. This is for the purpose of proving Copyright and proof of

consent and to be to respond to requests for replacement images being made several years after being taken.

If you have consented to receive details of our marketing activities, your contact name, home address, telephone number and email address that you provide to us and consent to us using to contact you for future marketing will be retained until such time as you request it's removal.

If you have consented to Petite Portraits using your images for specified purposes e.g marketing, then selected jpg or png images from your final gallery will be kept indefinitely for those purposes on the studio hard drives in the relevant usage storage files. Should you withdraw your consent they will be removed from those files.