

## PHOTOGRAPHY / DIGITAL MEDIA / INTERVIEW PRIVACY NOTICE

### What is the purpose of this document?

Imperial College of Science, Technology and Medicine (the “College” or “Imperial”) is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the applicable data protection legislation the Data Protection Act 2018 and the General Data Protection Regulations (the “GDPR”).

The College is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. This may include the Colleges [Staff Privacy Notice](#), [Student Privacy Notice](#) and [Events Privacy Notice](#).

### Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

### 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).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you:

- Name and signature
- Contact details (residential address, phone number, email address)
- Image (photo and/or video)

- Audio recording / interview transcript

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your health, including any medical condition, health and sickness and your involvement with a College led study or activity.
- Diversity information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation where it forms part of the event / interview.

### **How is your personal information collected?**

We collect most of the personal information about you directly in the course of providing services to you, after we have provided services to you or where we are in contact and organising an event or interview.

### **How we will use information about you and the legal basis for processing your data under the GDPR**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you or in order to take steps at your request prior to the entry into a contract.\*
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.\*\*
- Where you have consented to the processing\*\*\*

### **Situations in which we will use your personal information**

- to provide you with the information and services that you request from us\*/\*\*\*.
- to contact you in relation to taking part in an event / interview where data will be collected\*/\*\*.
- administering the contract we have entered into with you\*.
- filming, photographing, interviewing or otherwise recording events and publishing such content on our website, social media accounts and other formats (see 'Types of Media')\*/\*\*/\*\*\*

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### **Types of Media**

- *Digital communications*  
Publications on websites, blogs, digital screens, and other online platforms (including social media platforms Facebook, Twitter, and Instagram; iTunes U, YouTube, Threads). These generally include photographs, articles, interview transcripts, podcasts, videos, film and broadcast media.

- *Print publications*  
Publications include magazines, reports, postcards, envelopes, leaflets, prospectuses, and outdoor promotional material (including lamp-post banners and posters). These generally include photographs and edited articles, and promotion of digital materials.
- *Other types of communication*  
Publications on news platforms, such as newspapers, magazines, television, podcasts and radio shows.

### **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **How we use particularly sensitive personal information**

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.

### **Our obligations**

We will use your particularly sensitive personal information in the following ways:

- To manage any disability or dietary needs
- Where such information is inferred or captured as part of the event / interview and the College has your expressed permission to use the data recorded.

### **Automated decision-making**

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

### **Data sharing**

We may have to share your data with third parties, including third-party service providers and other entities in the College group.

Where acting as a data processor for the College, we require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK/EU. If we do, you can expect a similar degree of protection in respect of your personal information.

### **Why might you share my personal information with third parties?**

We may share your personal information with third parties where required by law, where it is necessary to administer the relationship with you or where we have another legitimate interest in doing so.

### **How secure is my information with third-party service providers and other entities in our group?**

All our third-party service providers and other entities in the College group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **What about other third parties?**

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business and operations of the College. We may also need to share your personal information with a regulator or to otherwise comply with the law.

### **Transferring information outside the UK/EU**

As part of the above processes, see ‘Situations in which we will use your personal information’ your images and / or data may be made available in publications on the internet, uploaded onto social media platforms or publications distributed worldwide.

Please note some countries do not have the same data protection laws as the United Kingdom though in all instances the College will consider the risks, integrate contractual agreements that protect the data involved and/or ensure data protection principles are maintained to minimise the likelihood of harm being caused.

### **Data security**

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures 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. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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.

### **Data retention**

#### **How long will you use my information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In relation to the types of data collected, it is expected the data will be retained

indefinitely unless you request otherwise and in some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## **Rights of access, correction, erasure, and restriction**

### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those 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.
- **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.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the College's Data Protection Officer. Please see the following for more information [Guide 12 - Individual Rights](#).

### **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is

another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the College's Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **Data Protection Officer**

We have appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer at:

Imperial College London  
Data Protection Officer  
Exhibition Road  
Faculty Building Level 4  
London SW7 2AZ

e-mail: [dpo@imperial.ac.uk](mailto:dpo@imperial.ac.uk)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

### **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

V1.0 July 2023