



PRIVACY NOTICE FOR PHOTOGRAPHIC SUBJECTS



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Rawle Gammon and Baker Holdings Ltd (we, us, our) is the Data Controller.

This Privacy Statement sets out how we will use the personal data relating to our Photographic Subjects.

We may make changes to this statement from time to time to reflect developments in the law or in the provision of our services.

What personal data is collected and what it is used for

Data such as your photograph will be held by us and used for the following reasons:

- Publication via online or electronic format for various communications, marketing or advertising (e.g. Website, Facebook etc...)
- Publication via a paper based format for various communications, marketing or advertising (e.g. general media, brochures, booklets, newsletters, leaflets etc...)
- Internal communications and training (e.g. Internal information on the company HR system, intranet, newsletters and induction day)

Your photograph may have been provided to us at the Company induction day or some other event. Photographs may also be obtained during the course of our relationship with you to enable us to carry out the purposes set out above.

We may also gather information from onsite CCTV surveillance or other publicly available sources.

We may process your data for purposes as set out above based on a Legitimate Interest basis, unless you have asked us not to.

If you wish to opt-out, please contact the Brand Team at brandteam@rgb ltd.co.uk or 01271 313000 or alternatively you can also write to us at The Brand Team, Rawle Gammon and Baker Holdings Ltd, Gammon House, Riverside Road, Pottington Business Park, Barnstaple, EX31 1QN.

Where necessary, we may have asked for your consent to process your data. You may withdraw consent for us to process your data at any time.

If you withdraw your consent, no further use will be made of the photographic image(s), but this will not affect the distribution of materials already printed which contain it/them.

How will my personal data be processed

Your personal data will only be processed in line with the Data Protection Principles, which are:

- Personal Data must be processed **lawfully, fairly and in a transparent manner**
- Personal Data must only be collected for **specified, explicit and legitimate purposes**
- Personal Data must be **adequate, relevant and limited to what is necessary**
- Personal Data must be **accurate and up to date**
- Personal Data must not be kept any longer than **necessary**
- Personal Data must be processed in a manner that ensures **appropriate security**

How long will you keep my personal data for

We will not keep your personal data any longer than necessary, however, for advertising and PR purposes certain information will be kept for a number of years.

Sensitive Information

We will not generally collect sensitive personal data such as information about physical or mental health from you, but if we do collect sensitive information or you choose to share sensitive information with us (such as details about your medical health), we will treat this information appropriately.

Disclosure of information to third parties

We will never sell your personal data to third parties. We will disclose your information to third parties with which we are associated in order to perform certain functions, for example, to our PR partner for the purpose of marketing and promotion. If we have a Legitimate Interest, or with your permission, we may publish your photograph on social media platforms and in written or electronic format using internally generated routes or the general media.

We will also disclose information about you if we have a legal obligation to do so.

Obtaining the information we hold about you

You have a right to request access to the information we hold about you and the right to request reasonable corrections and deletion of any inaccuracies. Under the General Data Protection Regulations, we are required to respond to your request within one month. If you would like a copy of the information we hold about you, please write to Jenny Naylor, HR Director, Rawle Gammon and Baker Holdings Ltd, Gammon House, Riverside Road, Pottington Business Park, Barnstaple, EX31 1QN.

We will not charge you for responding to your request however we will ask you to provide sufficient evidence to demonstrate that you are the data subject or the data subject's legal representative.

NOTE: Where requests are manifestly unfounded or excessive, in particular because they are repetitive, we may:

- Charge a reasonable fee taking into account the administrative costs of providing the information; or
- Refuse to provide the information. A refusal will be accompanied by an explanation why, together with information about your right to complain to the supervisory authority and to your rights to a judicial remedy.