



Privacy Notice for Photography and Filming

Introduction

Throughout this privacy notice, "University" "we", "our" and "us" refers to the Norwich University of the Arts.

This Privacy Notice explains the purposes for our photography and filming activities at organised events and around the campus. It details how we use the collected footage and photographs, our lawful bases for processing, our retention periods, and how you can exercise your rights.

The information in this Notice is in addition to any notices, consent forms and signage which may be in place at the time of the photography and/or filming. This Privacy Notice does not apply to contracted or paid models for the University's photography or filming purposes.

Norwich University of the Arts is a registered data controller. We collect, hold and process personal information in accordance with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA).

You may also want to read other Norwich University of the Arts Privacy Notices. We do our utmost to protect your privacy. As such we have security systems and procedures to protect information from unauthorised disclosure, misuse, or destruction.

What types of information we collect and hold about you

During organised events and around the campus, where photographing and filming takes place, the personal data we collect may include your photograph and filmed footage. If additional personal data is collected, such as your name and any other information, you will be specifically informed of this at the time.

How and why we collect this information

For organised events, we will let you know when photography or videography is taking place by providing advance notice during the event booking process; e.g. on booking forms, invitations and event information. We will also ensure that signage is put on display at entry and exit points and at prominent locations at the event. Where necessary, identifiers will be made available for individuals who do not wish to be filmed or photographed.

Where photographing and filming takes place in and around the campus, we will endeavour to ensure that any individual, whose *recognisable* image is collected, is made aware of our purpose for filming, where the images may be used, that the images may be retained indefinitely and given the option to not

be filmed or photographed. This will generally be communicated in advance of the filming but there may be occasions when this is not possible. Where this is the case, individuals will be provided with this information, and their right to object, at the time of recording.

The photographs and film we capture are used for our marketing and promotional purposes. These can include specific University initiatives, special events to promote the achievements of our students such as graduation ceremonies, other events and activities designed to promote and publicise the benefits of studying with us and the services we offer, the marketing of our courses, networking events and activities to raise awareness of our research and achievements.

The University complies with the provisions of the Data Protection Act 2018 which sits alongside the UK General Data Protection Regulation (UK GDPR). Article 6 of the UK GDPR defines six different lawful grounds for an organisation to be permitted to process personal data, and the University is legally obliged to determine and advise you of under which of the legal bases your personal data is processed.

The University will generally rely on Article 6(1)(f), '*legitimate interests*' as its legal basis where we judge the use of the personal data to be within our legitimate interests. We have a legitimate interest to be able to promote the University using photography and videography for the purposes explained earlier in this Notice. We make every effort to ensure you are aware when photography and / or filming is taking place and to minimise any privacy impact. There may be occasions where we wish to use your image and other personal data more prominently and, where we deem this to be potentially intrusive, we will ask for your express consent. It is important to note that you have a right to withdraw this consent at any time.

Opting out of photography and filming.

If you are attending an organised event at which there may be photography or video recording taking place, our pre-event communications will ask whether you wish to opt out of photography. It is important that you let us know as soon as possible if you do not wish to be filmed or photographed so that we can put arrangements in place, such as making sure we have a 'safe space' where this is possible, or by providing you with a badge, armband, lanyard, or other discreet identifier, so our event photographer is aware that you have opted out. We will make every effort not to capture or retain any images or footage of you.

If you have not been able to let us know in advance or have any questions or concerns at an event, please direct these to the photographer or videographer on site. We will ensure that the event photographer will be clearly identifiable.

Where photography and filming takes place around campus, you will be given the option to object to being included, by making the photographer or staff member aware.

If you wish to opt out after photography or filming has taken place, you can do so by writing to the Data Protection Officer at dataprotection@nua.ac.uk stating your name and the event you attended. Where we are unable to identify you, we may have to ask you to provide a recent photograph to assist us to complete the deletion. This photo will be used for identification purposes only and will be deleted from our records as soon as this has been done.

Please note that although we will stop using your image in current and future publications, we will not be able to remove any printed copies which have already been published and are in the public domain. Exercising your right to opt out after the event will not affect the lawfulness of any processing we conducted prior to your withdrawal.

We will only process your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

Who we might share your information with

The University will publicise images and footage of its events and activities to various audiences via its communications, its website, its prospectus, on social media and via other marketing media including high profile websites. These audiences may include UK and international prospective students, parents, research and other funders, policymakers, benefactors, the public and other stakeholders.

Automated Decision Making and Profiling

As part of our commitment to protecting your personal data, we want to inform you that the University currently limits the use of automated decision-making and profiling in line with the requirements of the UK GDPR. However, as we continue to develop our services, there may be instances in the future where automated processes are used to make decisions or create profiles. Should this occur, we will ensure that appropriate safeguards are in place and will always ensure that human intervention is involved when decisions are made that impact you.

How long we keep your information

Where the University collects and uses photographs and film footage to promote the achievements and successes of students and the services and work of the organisation, it does so to preserve and retain these important records and memories. As such, we may retain such data indefinitely, as part of our archives, unless specified otherwise in our communications.

Where we have used your images and/or other personal data very prominently and have collected your consent, the consent form used will have contained a specific retention period after which we will dispose of the photography and videography or seek to refresh your consent. We will seek to refresh your consent using the contact information provided within the consent form. Please note that after deletion the information may still appear in materials already in circulation prior to this date.

International Data Transfers

We may transfer your personal data to countries outside the UK (third countries), including countries within the European Economic Area (EEA) and beyond, where our third-party service providers or affiliated organizations are based. Such transfers may involve countries that do not have data protection laws equivalent to those in the UK.

When transferring personal data to a third country, we take steps to ensure that your data is protected in line with the UK General Data Protection Regulation (UK GDPR). These measures include the use of the following safeguards, where appropriate:

1. **Standard Contractual Clauses (SCCs):** For transfers to third countries that do not provide an adequate level of data protection, we implement the European Commission's Standard Contractual Clauses (SCCs) or equivalent contractual mechanisms as approved by the UK Information Commissioner's Office (ICO). These clauses legally bind the recipient of the personal data to ensure that your data is processed in accordance with the standards set out by the UK GDPR.
2. **Adequacy Decisions:** Where applicable, we may transfer your personal data to a third country that has been recognised by the UK government as providing an adequate level of data protection. In such cases, no further safeguards are required, and the transfer will be made in compliance with the UK's adequacy regulations.
3. **Additional Safeguards:** In some cases, additional measures may be taken, such as encryption, pseudonymisation, or other technical and organisational safeguards, to further protect your personal data during the transfer process.
4. **Transfers to Internal Organizations:** Your personal data may also be transferred to other entities within our university group or related organizations, including those based outside the UK, to support internal administrative functions, academic services, or research purposes. Any such transfers will be governed by appropriate safeguards, including but not limited to SCCs or other legally recognised measures under the UK GDPR.

We will ensure that any data transfer to third countries is carried out with appropriate legal protections in place, and we will provide you with further information upon request regarding the specific safeguards applied in relation to your data.

Your rights

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate or incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact our Data Protection Officer (Chris Dubinski) at dataprotection@norwichuni.ac.uk if you wish to make a request or have any queries. If you believe your data has been breached, please speak to the University.

How to contact us

If you require further information or have any concerns about how your personal information is held and processed by us, please email the University's Data Protection Officer at dataprotection@norwichuni.ac.uk or write to us at Data Protection Officer, Norwich University of the Arts, Francis House, 3 -7 Redwell St, Norwich NR2 4SN.

You can also complain to the ICO if you are unhappy with how we have used your data.
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

ICO Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>

Changes to this privacy notice

We keep our privacy notices under regular review.

This privacy notice was last updated April 2025.