

DDL & Swift Photography & Filming Policy

DOC Reference: DGP033

1. Policy Statement

This Policy governs how Davidsons Developments Ltd (DDL) trading as Davidsons Homes, Davidsons Group, Davidsons, or any housebuilding subsidiaries; or Albert Henry Interiors, (Swift Plant Ltd), capture, store and process images and videos.

We recognise that a customer's own imagery, or their child's, are personal, and therefore classified as personal information.

For the purpose of this document

- 'Customer' refers to potential customers, actual clients, reviewers, social media influencers or any individuals who attends a physical, virtual or marketing event.
- 'Imagery/images refer to digital photography, hard copy imagery and digital videos.

2. Background

The marketing teams of both companies obtain images and videos when undertaking promotional events, either on site, in our offices, online or other event locations.

3. Responsibilities

It is the nominated Marketing Manager's responsibilities to ensure that these policies are adhered to and understood by both our customers, our employees and our partners.

Marketing Managers must raise an ongoing operational GDPR concerns with the relevant internal Data Protection Officer.

4. Policy Statements

4.1. Informing & Consent

- Customers will always be asked to provide consent before we use any imagery which they appear in. (Form DGP033 *'Photography & Filming Consent Form'*)
- This consent evidence must be retained on file.
- Each customer must be informed in writing, or via email, of how we may use this information and where it may be used. Customers must also be notified of how long we retain these assets on file and whom to contact should they have any questions, or wish to withdraw their consent. We have designed a standard Information Sheet (DGP032 *Photography & Filming Information Sheet*) to support this.
- We will always obtain consent from responsible adults when capturing imagery of children.

4.2 Consent Management

- Marketing Managers will maintain a process linking 'Consent' forms to actual images so that if a Consent is withdrawn, they are able to identify which applicable images are related to the specific consent being withdrawn.
- Marketing Managers will maintain a process linking images (and consent) to any promotional material so that they know which specific promotional material contain assets, that a customer may have withdrawn their consent from using.
- Since we are not using an image of a customer to carry out a process which requires us to uniquely identify a specific person, we do not view our images of Customers as Biometric data (special category data) as defined by the UK GDPR.
- Transition statement. In Sept 2022, we implemented new clearer policies and processes for image consent management. Consent captured before this date may still be relied upon providing the Customer does not withdraw their consent in the intervening period. Marketing Managers should

still make all efforts to delete legacy images after 10 years, based on the date that the photo was taken. (This may be stored in the RAW data within the photo itself).

4.2. Authorised Users

Only authorised personnel are permitted to access online locations where we store Customer imagery. All such access requests should be approved by an appropriate manager and submitted via the IT Help Desk.

4.3. Asset Management : Annual Review

The relevant Marketing Manager will undertake a review each year to ensure that any digitally stored images, video assets or promotional materials which have now passed their expiry date (see Retention Policy) are removed and deleted from our systems.

4.5 Asset Management : Subject Asset Requests

The relevant Marketing Manager will respond to support any received Subject Access Requests (SARs) concerning disclosure, withdrawing of Consent and Right To Be Forgotten as per time scales defined in our Subject Access Request Policy.

Marketing Managers are responsible for ensuring that any images supplied to 3rd Parties are also deleted and removed as per our Customers' requests.

4.6 Asset Management : Sub-Processors

Marketing Managers are advised to store Customer images and videos in a single online location within their company. Should an image need to be shared with a third party sub-processor then ideally the sub-processor will

- be provided with secure access to our systems to obtain it
- informed, (via Contract, Data Processing Agreement, or written instruction) what they may use such imagery for, what it may not be used for, and when it must be deleted. Sub-processors should NOT be permitted to retain Customer imagery any longer than they need it.

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Version Control

Version	Revised by	Section Revised
V0.0a	G Braithwaite	First draft, not issued etc
V1.1a	G Braithwaite	Include a transition statement for legacy consent.
V1.2	G Braithwaite	Reviewed and updated to include Davidsons Developments Ltd and trading as names.