

# Fair Processing Procedure

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## Purpose

DE Photo (Franchising) Ltd (referred to as the company here after) adhere to the principles of data protection as defined in the General Data Protection Regulation. This procedure will help the company comply with the first principle of data protection (lawfulness, fairness and transparency) by establishing clear and precise expectations to data subjects with regards to processing of their data, including what, how, why and who is controlling and processing the data and for what purposes.

The company is an event photography company who provides digital images in both electronic and printed formats. Photos are only taken during public events in our role as the appointed official photographers to the specific event organisers. Photos are made available for purchase during the public event and can also be viewed and purchased post-event from the company website.

## Prerequisites

Due to the restricted circumstances surrounding events in public places, the company is not in a realistic position to obtain prior consent nor able to identify any data subjects beyond the photographic image itself. Therefore, the photo is a necessity for customers to identify themselves or their children, without which no identification by the customer would be possible.

Every effort is made by the company to ensure that the event organiser notifies participants and spectators of the presence of an official photographer both prior and during the event.

For this procedure to be followed the following conditions need to be met:

- All parties need to be aware of their roles and responsibilities.
- The Data Protection Policy and Legitimate Interests Assessment (LIA) need to be current and available to the relevant parties.
- Any systems/services/devices referenced need to be available to the relevant parties.
- All parties have had the relevant training and the training is current and up to date.
- The company is acting in an official capacity to the event organiser.
- The event is held in a public place.

## Conditions

This procedure should be enacted when:

- New data processing will take place
- An existing data process is changing
- An existing data process is found not to be compliant

## Outcomes

The data subjects and affected parties have a full understanding of the data process, how and why their data is used, how long their data will be held, the possible consequences of processing and their rights.

The data subjects and affected parties know who to contact if they have any queries, complaints, questions or if they wish to exercise their rights.

## Process

### Lawful processing sub-process

1. For the data process one of the following must apply:
  - a. The data subject will provide consent to the processing of their data once they have been informed of the process purpose.
  - b. The data processing is necessary for the performance of a contract or for entering into a contract with the data subject.
  - c. The data processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
  - d. The data processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.

### Managing consent sub-process

The company respects your privacy and individual rights and will remove images from a display at the event upon legitimate request to any Company Staff member or from our website by sending an email to [removal@dephoto.co.uk](mailto:removal@dephoto.co.uk)

## Management and Review

This policy should be reviewed as scheduled once annually unless performance indicators, changes to legislation or the organisation necessitate it.