
PRIVACY POLICY

BACKGROUND:

The London Photographic Agency LTD understands that your privacy is important to you and that you care about how your personal data is used. [We] **OR** [I] respect and value the privacy of everyone who visits this website, www.thelpa.co.uk (“[Our] **OR** [My] Site”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with [our] **OR** [my] obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy [is deemed to occur upon your first use of [Our] **OR** [My] Site] **OR** [is requested by any message appearing as a result of using the site]. If you do not accept and agree with this Privacy Policy, you must stop using [Our] **OR** [My] Site immediately.

1. Information About [Us] **OR** [Me]

[Our] **OR** [My] Site is [owned and] operated by The London Photographic Agency, a limited company [registered in England under company number **09479624**].

[Registered address: **59 Dukes Wood Avenue, Gerrards Cross, United Kingdom, SL9 7JY.**]

[Main trading address:] **OR** [Address:] **47B Wisteria Road, London SE135HW.**

[VAT number: NA.]

[Data Protection Officer: Xavier J. Fiddes.

Email address: xavier@thelpa.co.uk.

Telephone number: 07790868901.

Postal address: **47B Wisteria Road, London SE135HW.]**

2. What Does This Policy Cover?

This Privacy Policy applies only to your use of [Our] **OR** [My] Site. [Our] **OR** [My] Site may contain links to other websites. Please note that [we] **OR** [I] have no control over how your data is collected, stored, or used by other websites and [we] **OR** [I] advise you to check the privacy policies of any such websites before providing any data to them.

3. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which [we] **OR** [I] will always work to uphold:

- a) The right to be informed about [our] or [my] collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact [us] **OR** [me] to find out more or to ask any questions using the details in Part 12.
- b) The right to access the personal data [we] **OR** [I] hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by [us] **OR** [me] is inaccurate or incomplete. Please contact [us] **OR** [me] using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask [us] **OR** [me] to delete or otherwise dispose of any of your personal data that [we] **OR** [I] hold. Please contact [us] **OR** [me] using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to [us] **OR** [me] using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if [we are] **OR** [I am] relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to [us] **OR** [me] directly, [we are] **OR** [I am] using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask [us] **OR** [me] for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. [[We] **OR** [I] do not use your personal data in this way.]

For more information about [our] **OR** [my] use of your personal data or exercising your rights as outlined above, please contact [us] **OR** [me] using the details provided in Part 12.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data [we] **OR** [I] hold about you changes, please keep [us] **OR** [me] informed as long as [we] **OR** [I] have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about [our] **OR** [my] use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. [We] **OR** [I] would welcome the opportunity to resolve your concerns [ourselves] **OR** [myself], however, so please contact [us] **OR** [me] first, using the details in Part 12.

5. **What Data Do You Collect and How?**

Depending upon your use of [Our] **OR** [My] Site, [we] **OR** [I] may collect and hold some or all of the personal [and non-personal] data set out in the table below, using the methods also set out in the table. [[We] **OR** [I] do not collect any ['special category' or 'sensitive' personal data] **AND/OR** [personal data relating to children] **AND/OR** [data relating to criminal convictions and/or offences].]

Data Collected	How [We] OR [I] Collect the Data
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[Identity Information including - name.]	Contact page of www.thelpa.co.uk and guest book of galleries.thelpa.co.uk.
[Contact information including address, email address and contact telephone number.]	Contact page of www.thelpa.co.uk and guest book of galleries.thelpa.co.uk..
[Business information including business name.]	Contact page of www.thelpa.co.uk and guest book of galleries.thelpa.co.uk..

6. How Do You Use My Personal Data?

Under the Data Protection Legislation, [we] **OR** [I] must always have a lawful basis for using personal data. The following table describes how [we] **OR** [I] [will] **OR** [may] use your personal data, and [our] **OR** [my] lawful bases for doing so:

What [We] OR [I] Do	What Data [We] OR [I] Use	[Our] OR [My] Lawful Basis
[Registering you on [Our] OR [My] Site.]	None.	NA
[Administering [Our] OR [My] Site.]	Email address.	To contact you with regard to your query.
[Administering [our] OR [my] business.]	Email address.	To send information such as estimates and invoices.
[Supplying [our] OR [my] [products] AND/OR [services] to you.]	Email address.	To keep you informed of progress of different elements of the work carried out.
[Communicating with you.]	Email address.	As Above.

[With your permission and/or where permitted by law, [we] **OR** [I] may also use your personal data for marketing purposes, which may include contacting you by [email] **AND/OR** [telephone] **AND/OR** [text message] **AND/OR** [post] with information, news, and offers on [our] **OR** [my] [products] **AND/OR** [services]. You will not be sent any unlawful marketing or spam. [We] **OR** [I] will always work to fully protect your rights and comply with [our] **OR** [my] obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.] [[We] **OR** [I] will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.]

[We] **OR** [I] will only use your personal data for the purpose(s) for which it was originally collected unless [we] **OR** [I] reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If [we] **OR** [I] do use your personal data in this way and you wish [us] **OR** [me] to explain how the new purpose is compatible with the original, please contact [us] **OR** [me] using the details in Part 12.

If [we] **OR** [I] need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, [we] **OR** [I] will inform you and explain the legal basis which allows [us] **OR** [me] to do so.

In some circumstances, where permitted or required by law, [we] **OR** [I] may process

your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. How Long Will You Keep My Personal Data?

[We] OR [I] will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long [We] OR [I] Keep It
[Identity Information including name.]	Indefinitely, or until we are asked to delete such data.
[Contact information including address, email address and telephone number.]	Indefinitely, or until we are asked to delete such data.
[Business information including business name and job title.]	Indefinitely, or until we are asked to delete such data.
[Payment information including bank account details.]	Indefinitely, or until we are asked to delete such data.

8. How and Where Do You Store or Transfer My Personal Data?

[[We] OR [I] will [only store or transfer your personal data] OR [store or transfer some of your personal data] within the UK. This means that it will be fully protected under the Data Protection Legislation.]

AND/OR

[[We] OR [I] will [only store or transfer your personal data] OR [store or transfer some of your personal data] within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.]

AND/OR

[[We] OR [I] [may] store or transfer some or all of your personal data in countries that are not part of the [European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein)] OR [EEA]. These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that [we] OR [I] will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

[[We] OR [I] share your data within the group of companies of which [we are] OR [I am] a part. Where this involves the transfer of personal data outside the EEA, [our] OR [my] group ensures that personal data is protected by requiring all companies

within the group to follow the same rules with respect to personal data usage. These are known as “binding corporate rules”. More information on binding corporate rules is available from the [European Commission.](#)]

AND/OR

[[We] OR [I] share your data with external third parties, as detailed below in Part 9, that are based outside of the EEA. The following safeguard[s] [is] OR [are] applied to such transfers:

[[We] OR [I] [will only] transfer your personal data to third countries whose levels of data protection are deemed ‘adequate’ by the European Commission. More information is available from the [European Commission.](#)]

AND/OR

[[We] OR [I] use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts require the same levels of personal data protection that would apply under the Data Protection Legislation. More information is available from the [European Commission.](#)]

AND/OR

[Where [we] OR [I] transfer your data to a third party based in the US, the data may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe. More information is available from the [European Commission.](#)]

Please contact [us] OR [me] using the details below in Part 12 for further information about the particular data protection mechanism[s] used by [us] OR [me] when transferring your personal data to a third country.]

The security of your personal data is essential to [us] OR [me], and to protect your data, [we] OR [I] take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where [we are] OR [I am] legally required to do so.

9. Do You Share My Personal Data?

[[We] OR [I] will not share any of your personal data with any third parties for any purposes, subject to the following exception[s].

[If [we] OR [I] sell, transfer, or merge parts of [our] OR [my] business or assets, your personal data may be transferred to a third party. Any new owner of [our] OR [my] business may continue to use your personal data in the same way(s) that [we] OR [I] have used it, as specified in this Privacy Policy.]

In some limited circumstances, [we] OR [I] may be legally required to share certain personal data, which might include yours, if [we are] OR [I am] involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.]

10. Can I Withhold Information?

You may access [certain areas of] [Our] OR [My] Site without providing any personal data at all. [However, to use all features and functions available on [Our] OR [My]

Site you may be required to submit or allow for the collection of certain data.]

11. **How Can I Access My Personal Data?**

If you want to know what personal data [we] **OR** [I] have about you, you can ask [us] **OR** [me] for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12. [To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell [us] **OR** [me] everything [we] **OR** [I] need to know to respond to your request as quickly as possible.]

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover [our] **OR** [my] administrative costs in responding.

[We] **OR** [I] will respond to your subject access request within [14 Calendar Days and, in any case, not more than] one month of receiving it. Normally, [we] **OR** [I] aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date [we] **OR** [I] receive your request. You will be kept fully informed of [our] **OR** [my] progress.

12. **How Do I Contact You?**

To contact [us] **OR** [me] about anything to do with your personal data and data protection, including to make a subject access request, please use the following details [(for the attention of Xavier Fiddes)]:

Email address: xavier@thelpa.co.uk.

Telephone number: +44(0)7790868901.

Postal Address: The LPA, 47B Wisteria Road, Hither Green, London.

13. **Changes to this Privacy Policy**

[We] **OR** [I] may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if [we] **OR** [I] change [our] **OR** [my] business in a way that affects personal data protection.

Any changes will be immediately posted on [Our] **OR** [My] Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of [Our] **OR** [My] Site following the alterations. [We] **OR** [I] recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 16th October 2018.