

Images and Recordings - Privacy Notice

The City of London is committed to protecting and respecting your privacy when you provide your personal data as part of images, and recordings.

This Privacy Notice explains how we use personal data about you and how we protect your privacy. If you have any concerns or questions about how we look after your personal data, please contact the City of London's Data Protection Officer, also the Comptroller and City Solicitor, Michael Cogher, at information.officer@cityoflondon.gov.uk.

Please note - this Privacy Notice was updated on 23 April 2025

Departments this notice applies to: All departments

1. Your personal data.

Personal data is anything that directly or indirectly identifies and relates to a living person, such as a name, address, telephone number, date of birth, your gender, age, how the application was made etc. etc.

All personal data collected will be evaluated periodically and only kept as long as necessary or in line with legal requirements.

In respect of any images or recordings that are taken of you, we note that the following personal data may be processed:

- Image and recording
- Name
- Contact details – e.g. email address, phone number

2. Why do we need your personal data.

We will collect and process the above data about you:

- For the purposes of producing marketing and promotional materials, such as leaflets, posters newsletters, (not an exhaustive list).
- For use in social media posts.
- To administer the use of your image/ recording
- To respond to any correspondence received from yourself.

Where your personal data may be used for social media activities examples of the systems used include but are not limited to,

- City of London's Facebook page
- City of London's Twitter page
- City of London's Instagram page

3. How the law allows us to use your personal data.

There are several legal reasons why we will need to collect and use your personal data in different circumstances.

Generally, we collect and use personal data where:

- We have received your consent.
- it is necessary for the purposes of legitimate interests pursued by the data's controller.

4. Consent.

If we have consent to use your personal data for any particular reason, you have the right to remove your consent at any time. If you want to remove your consent, please contact information.officer@cityoflondon.gov.uk and tell us about the image/recording being used and where it is being used or the department which has the photo, so we can respond to your request.

Please note that where the image/recording is of a child, and they are under 18 years old, consent will be requested of the parent/guardian/carer for the child concerned.

5. Your rights regarding your personal data.

The law gives you a number of rights in relation to what personal data is used by the City of London, and how it is used. These rights are listed below, and full details can be found in the [City of London Corporation Data Subjects' Rights Policy](#)

Your Rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your data to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at information.officer@cityoflondon.gov.uk

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

You can ask us to:

- provide you with a copy of the personal data that we hold about you;
- correct personal data about you which you think is inaccurate;
- delete personal data about you if you think we no longer should be using it;

- stop using your personal data if you think it is wrong, until it is corrected;
- transfer your personal data to another provider in a commonly used format;
- not use automated decision-making processes to make decisions about you.

6. Who we share your personal data with.

In some circumstances, we use other organisations to either store personal data or use it to help deliver our events to you. Where we have these arrangements, there is always an agreement in place to make sure that the organisation complies with data protection law.

We note that images and recordings may be shared with third parties, for example other local authorities or organisations who are involved with the event taking place.

Sometimes we have a legal duty to provide personal data to other organisations. We may also share your personal data when we consider/believe that there is a good reason to do so, which is more important than protecting your privacy. This doesn't happen often, but in these circumstances, we may share your personal data:

- to find and stop crime and fraud; or
- if there are serious risks to the public, our staff or to other professionals;
- to protect a child; or to protect adults who are thought to be at risk, for example if they are frail, confused or cannot understand what is happening to them.

For all these reasons, the risk must be serious before we can override your right to privacy.

If we are worried about your physical safety or feel we need to take action to protect you from being harmed in other ways, we will discuss this with you and, if possible, get your permission to tell others about your situation before doing so.

We may still share your personal data if we believe the risk to others is serious enough to do so.

If this is the case, we will make sure that we record what personal data we share and our reasons for doing so. We will let you know what we have done and why, if we think it is safe to do so.

7. How do we protect your personal data.

We have a legal duty to make sure we hold your personal data (on paper and electronically) in a secure way, and to only make it available to those who have a right to see them.

Examples of our security include:

- Encryption, meaning that personal data is hidden so that it cannot be read without special knowledge (such as a password).
- Controlling access to systems and networks allows us to stop people who are not allowed to view your personal data from getting access to it
- Restricting the amount of personal data which is used in regard to the activity.
- Training for our staff allows us to make them aware of how to handle personal data, and how and when to report when something goes wrong.

You can find more details of our Information Security expectations in our IT Security Policy.

8. Where do we store your personal data.

The majority of personal data is stored on systems in the UK or EU. However, there are some occasions where your personal data may leave the UK/EU either to get to another organisation, or where it is stored in a system outside of the EU.

We have additional protections on your personal data if it leaves the UK ranging from secure ways of transferring data to ensuring we have a robust contract in place with that third party.

9. How long do we keep your personal data.

We will only hold your personal data for as long as it is necessary to fulfil our legal duties or business purposes.

Where your image or recording is being processed, typically this is held for a period of three years, unless stated otherwise.