

Data Privacy Notice for Photography, Filming and Audio Recording

Updated February 2024

About this data protection notice

This is a statement of the practices of The Institute of Bankers in Ireland, 1 North Wall Quay, IFSC, Dublin 1 (trading as IOB) ('IOB', 'we', 'us', 'our') in connection with the capture of personal data through photography, filming and/or audio recording and the steps taken by IOB to respect your privacy. It explains how we use the film, photographs and audio we capture, our lawful bases for processing, our relevant retention periods, and how you can exercise your privacy rights.

This notice provides information that is in addition to any photography and film privacy notices, consent forms and signage which may have been in place at the time photography/filming/audio recording took place.

Please read this notice to understand our practices and if you have any questions, please contact us using the contact details provided below.

This privacy notice does not apply if you were a contracted/paid model for IOB photography/film or audio purposes.

Who are we?

IOB is a Data Controller and is committed to protecting your rights and any personal information which you provide to IOB will be treated with the highest standards of security and confidentiality, in accordance with Irish and European Data Protection legislation.

Ensuring you know that photography /filming/audio recording is taking place

Wherever possible we will ensure that you know when photography/filming/audio recording is taking place in the following ways:

- Advance notice of our intention to photograph/film/record audio within event booking forms, event invitations, event information, event confirmations etc.;
- Comprehensive signage at prominent locations, entry and exit points to the event;
- The IOB photographer/videographer/audio producer will be clearly identifiable;
- The IOB photographer/videographer/audio producer will approach clearly visible and identifiable individuals to verbally inform them that a photograph/film/audio recording will be taken.

The personal data we process may include:

- Photographs, filmed footage and/or recorded audio;
- Your name, job title, employer, programme of study, country of origin (as applicable), where you have given us consent;
- Where any other personal data is collected, you will have been specifically informed of this at the point of photography, filming or audio recording.

Please note that video footage or quotations you provide may be edited to keep them concise. We will not change the meaning of what you have said when editing.

Purposes of our photography and filming

The photographs, film and /or audio we capture may be used for our marketing, promotional and archival purposes, which may include:

- Promoting specific IOB initiatives explained at the point of photography or filming or audio recording;
- Promoting IOB, our events, our activities, benefits to studying with us, our services, our programmes and/or our research to various audiences, including domestic and international students or prospective students, educational partners, research and other funders, policy-makers, benefactors, the public and other stakeholders.

The recipients or categories of recipients of the personal data

The images/ film/audio we take will likely be placed into the public domain. This includes within IOB publications, printed media, prospectuses, on the IOB website and other IOB related websites, IOB social media accounts, billboards/hoardings and other public domain advertising, and within adverts placed with specific third parties, (e.g. Google, Facebook, LinkedIn and Instagram).

As such, published photographs/film/audio are available to anyone who has access to the website, social media channels or printed materials etc. in which the photo, video or audio features.

The original photographs/videos/audio recordings will only be accessible to employees and agents of IOB, or third parties that process data on our behalf (e.g. printing providers, digital asset management suppliers, video editors etc.). We may also share images/film/audio recordings with our educational partners or affiliated organisations where relevant to the event.

Our lawful bases for processing

- **Legitimate interest** – We have a legitimate interest to be able to promote IOB using photography/videography/audio, as explained under the Purposes heading (above). We make every effort to ensure you are aware when photography/filming/audio recording is taking place. We will attempt to avoid direct identification to minimise privacy impact.
- **Consent** – Where appropriate, we may seek your consent to photograph/film/record your audio. This will be done with a specific written consent form, either electronic or paper-based. We will likely rely upon this lawful basis at smaller events where you are more prominently featured within the photography/videography/audio recording. You are able to opt-out of photography/filming/audio recording as explained below.

Withdrawing consent or opting-out

If we have collected your consent or you wish to opt-out once photography/filming/audio recording has taken place you can withdraw your consent by contacting us using the contact details below, stating your name, the event you attended and date.

Where we are unable to identify you, we may ask you to provide a recent photograph to assist us to complete the deletion. This will also be securely disposed of, once deletion of event photography/film has taken place.

Although we will stop using your image in current publications we continue to control, digital publications and in any future publications, we will not be able to remove any printed copies which have already been published and are out in the public domain. Withdrawing your consent/opting-out will not affect the lawfulness of any processing we conducted prior to your withdrawal.

Data retention

We will retain personal data for no longer than is necessary in accordance with IOB's Retention and Disposal Schedule. Where we have collected your consent, the consent form used will have contained a specific retention period after which we will dispose of the photography/videography/audio recording or seek to refresh your consent.

The corporate memory of IOB which comprises of IOB's administrative, legal and historical records is of important historical value. IOB will process personal data of archival value in accordance with section 42 of the Irish Data Protection Act 2018 which permits that personal data of archival value in the public interest may be retained. Personal data retained by IOB for archival purposes, in the public interest, which may include images, filming or audio recordings will be stored and secured in accordance with the principles of data protection.

Your rights in respect of the processing of your personal data

When your personal data is processed by IOB, you are entitled to rely on a number of rights. These rights allow you to exercise control over the way in which your personal data is processed, subject to applicable exemptions.

For example:

- **The right to be informed** – this data protection notice, event signage and any applicable consent forms/privacy information provided, assist with fulfilling these obligations.
- **The right to object / withdraw consent, right to restrict processing, right to erasure** – please see 'Withdraw consent or opting out' (above) for information about how to exercise these rights.
- **The right of access, right to rectification, right to data portability** – please contact IOB's Data Protection Officer at dataprotection@iob.ie to exercise these rights.

Please note, that these rights apply in certain circumstances, for example, according to the lawful basis utilised by IOB. The right of access to personal information held about you exists in order to be aware of, and verify, the lawfulness of the processing.

Contacting us or making a complaint

For questions or concerns about this Data Protection Notice, or IOB's use of photography/film/audio recordings, or if you have a complaint about the use of your personal information, please let a member of IOB staff know at info@iob.ie, giving us the opportunity to address your concern as quickly as possible.

If you wish to make a data protection complaint you can do so by emailing dataprotection@iob.ie.



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Please be assured that all complaints received will be fully investigated. We ask that you supply as much information as possible to help our staff resolve your complaint quickly.

You may also contact the Data Protection Commission in Ireland to lodge a complaint at:
Data Protection Commission, 21 Fitzwilliam South, Dublin 2, D02 RD28. Web: dataprotection.ie

Updates to this data protection notice

We keep this notice under regular review and will make changes from time-to-time in response to changing legal, technical or business developments. When we update our data protection notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.