

## Privacy Notice (UK GDPR)

### 1. Introduction

JP Photographic Ltd. takes the protection of personal data seriously and is committed to complying with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This Privacy Notice explains how we collect, use, store and protect personal data when providing school photography services and when you use our websites.

This notice applies to:

- Schools and educational establishments
- Parents and guardians
- Pupils whose images are captured as part of school photography
- Users of our websites, including [www.photoprinting.co.uk](http://www.photoprinting.co.uk)

### 2. Data Controller and Contact Details

#### Data Controller (in most cases):

JP Photographic Ltd.

Company Number: 04731146

Registered Office: 29 Gildredge Road, Eastbourne, BN21 4RU

Operating Office: 4 Burlington Gardens, Portslade, East Sussex, BN41 2DJ

Registered with the Information Commissioner's Office (ICO): **ZA326458**

#### Data Protection Officer:

Mr Simon Pert (Director)

Telephone: 01273 381111

Email: [simon@jpphotographic.co.uk](mailto:simon@jpphotographic.co.uk)

### 3. Our Role: Controller and Processor

- When we process pupil data provided by a school for the purpose of school photography, **the school is usually the data controller and JP Photographic Ltd. acts as a data processor**, processing data only on the school's documented instructions.
- When parents or guardians place orders directly with us, **JP Photographic Ltd. acts as an independent data controller** for that processing.

Appropriate Data Processing Agreements are in place with schools where required.

### 4. Personal Data We Collect

#### 4.1 Data Provided by Schools (Prior to Photography Day)

Where requested by a school, we may receive the following data for each pupil:

- First name
- Last name
- Class
- Year group

- Admission number
- UPN

Pupil images are matched to this data following the photography session.

#### **4.2 Data Collected During Ordering**

When an order is placed via our website, we collect:

- Parent/guardian name
- Child's name and class
- Email address and telephone number
- Billing and delivery address
- Order details
- IP address

#### **4.3 Technical and Security Data**

- IP addresses of website visitors (including non-ordering visitors)
- Transaction and security logs

### **5. Lawful Bases for Processing**

We process personal data under the following lawful bases (Article 6 UK GDPR):

- **Contract:** To process and fulfil orders, deliver products, and provide customer support.
- **Legal Obligation:** To retain financial and accounting records.
- **Legitimate Interests:**
  - Producing and distributing school photographs
  - Preventing fraud and maintaining website security
  - Enabling reorders and replacement products
  - Maintaining historical image archives for customer service purposes

Where we rely on legitimate interests, we have carried out balancing assessments to ensure that our interests do not override the rights and freedoms of data subjects.

### **6. How We Store Data and Who Has Access**

- Core databases are stored on-site at JP Photographic Ltd.
- Limited data required for online ordering is stored on a secure server in Germany (EEA).
- Temporary digital download files are stored for up to 30 days on an Amazon S3 server.
- Order-related emails are stored securely within our Google Workspace environment.

Access to personal data is restricted to authorised staff and vetted third-party service providers who require access to perform their duties. Access is controlled using strong authentication, temporary credentials where appropriate, and role-based permissions.

Appropriate physical, technical and organisational security measures are in place.

## **7. International Data Transfers**

Where personal data is transferred outside the UK, appropriate safeguards are in place in accordance with UK GDPR, including adequacy regulations and contractual protections with service providers.

## **8. Data Retention**

We retain personal data only for as long as necessary for the purposes for which it was collected.

### **8.1 Images and Order Data**

- Pupil images and associated order records are retained **for up to 14 years from the date of capture**, or until a valid request for erasure is received, whichever occurs first.
- This extended retention period is based on our **legitimate interests** in:
  - Enabling reorders many years after the original photography session
  - Replacing lost or damaged products
  - Responding to customer queries and complaints

Retention is subject to periodic review and data is securely deleted when no longer required.

### **8.2 Other Retention Periods**

- Online ordering server data: Normally, pupil and order data is available online for approximately **24–27 months** from the date of capture. After this period, access is disabled and data is removed from the online ordering system. In exceptional cases, at the request of a school or parent, previously expired data may be temporarily reactivated until the end of the following month to allow late orders. All reactivations are strictly time-limited and deleted once no longer required.
- IP address and log data: 90 days
- Backup data: 90 days
- Accounting records: retained in line with statutory requirements

## **9. Sharing of Personal Data**

We may share personal data with:

- Schools, for the purpose of distributing orders
- Delivery providers (e.g. Royal Mail, DPD)
- IT and hosting providers who support our systems
- Payment processors (payment details are encrypted and not stored by us)

We do not sell or rent personal data.

## **10. Data Subject Rights**

Under UK GDPR, you have the right to:

- Access your personal data
- Rectify inaccurate or incomplete data
- Request erasure (where applicable)
- Restrict processing
- Object to processing based on legitimate interests
- Data portability (where applicable)
- Lodge a complaint with the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk))

Some rights are not absolute and may be limited by legal obligations.

Requests can be made by contacting: [info@jppphotographic.co.uk](mailto:info@jppphotographic.co.uk)

## **11. Cookies**

Our website uses only strictly necessary cookies required for its operation. No analytics, marketing or advertising cookies are used.

## **12. Email Communications**

Emails sent to us are transmitted using TLS encryption and stored securely. Email content is not processed by third parties for marketing purposes.

## **13. Personal Data Breaches**

In the event of a personal data breach, we will assess the risk and notify the ICO within 72 hours where required. Affected individuals will be informed without undue delay where there is a high risk to their rights and freedoms.

## **14. Changes to This Privacy Notice**

This Privacy Notice may be updated from time to time to reflect legal or operational changes. The most current version will always be available on our website.

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**Last updated:** 19/12/2025