



# Photo and Video Policy

## Policy Summary

This policy sets out Southern Co-op's procedures for photos/videos taken, used and retained by Southern Co-op. You can request copies of our Privacy Notice, Data Protection Policy, Data Retention Policy or CCTV Policy by contacting our Data Protection Officer on [dataprotectionofficer@southerncoops.co.uk](mailto:dataprotectionofficer@southerncoops.co.uk).

## Policy Detail

### Photo/video consent

Southern Co-op regularly takes photos/videos to illustrate and promote the work it does. To comply with Data Protection legislation, Southern Co-op will request permission on each occasion where we take a photo/video of any individual – this includes all customers and colleagues with the exception of specific circumstances outlined below. Consent will be specific to an occasion and individual with additional consent required thereafter. Retrospective consent should be requested if required.

Individuals will be asked if they consent to their names being shared alongside the use of the photos/videos. Permission must be obtained from parents/guardians when the individual is under 18 years old.

Southern Co-op will be responsible for ensuring adequate procedures are in place to ensure that the information is managed in accordance with the relevant legislation and regulatory guidance.

### Photo usage

Photo/video use may include, but is not exclusive to, internal and external press releases, publications, exhibitions, on the internet including social media and marketing materials. We use photos/videos to illustrate the work that Southern Co-op does. Examples include press releases for news outlets and printed magazines, in internal and external publications such as our Annual Review, in adverts or training presentations, and on Facebook, Twitter, LinkedIn and/or Instagram.

In order to share photos/videos with third parties who are not described in the above paragraph, such as a charity partner, Southern Co-op will ask for permission in advance from all individuals in the photos/videos (with the exception of specific circumstances outlined in this policy). This consent will enable third parties to use the photos/videos in their own publications, websites and social media.

### Withdrawing consent

All individuals have the right to withdraw consent at any time by contacting Southern Co-op's Data Protection Officer via [DataProtectionOfficer@southerncoops.co.uk](mailto:DataProtectionOfficer@southerncoops.co.uk). Individuals will be asked



to include details of the location and approximate timeframe in which the photos/videos were taken.

Once consent has been withdrawn, Southern Co-op will remove the relevant files from its systems and no longer use them for future press and marketing purposes.

Where applicable, Southern Co-op will also contact any third parties to request they also erase the photos/videos. Due to the nature of their usage, it is unlikely that Southern Co-op will be able to recall photos/videos that have already been shared with the media or used in existing marketing materials.

## Retention

All photos/videos will be kept for a period of five years from the date it was taken with the exception of photos/videos of significant events which will be kept for the purpose of historical records.

For further information on data protection and your rights such as access and correction processes, please refer to our Privacy Policy.

## Exceptions

### Events and large groups

Individual consent will not be obtained for events or photos/videos of more than 15 people. In these circumstances, notices will be displayed to inform people that photography/videoing will be taking place and to inform them to notify an organiser or the photographer if they would not like to be photographed/videoed or named alongside the use of the photo/video. The photographer/videographer may ask individuals to wear an identifying mark such as a sticker or sit in a specific area of seating to assist. Southern Co-op will not be responsible for photos taken by other individuals or organisations.

### Internal materials

For internal use, written photo/video consent will not be required but individuals will be made aware of the intentional usage of the photos/videos at the time the photos/videos are taken. The exception to this is any physically printed internal materials for which consent will be obtained from all individuals in the photos.

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