

## **Privacy Policy of Stills Ltd.** [Last updated July 2025]

### **1. Preliminary**

1.1 Stills Centre for Photography is committed to respecting and protecting your privacy. This Policy outlines how we collect, use, and protect your personal data when you interact with us—whether in person, on our website, or through our services.

### **2. Definitions**

- "Stills", Stills School" and "Stills Ltd." means Stills Centre for Photography, based at 23 Cockburn St, Edinburgh, EH1 1BP, Scotland
- "We" or "us" or "our" means Stills
- "Website" means the whole or any part of the website controlled or operated by Stills and located at <https://stills.org>
- "Personal data" means any information that relates to an identified or identifiable individual, such as a name, email address, identification number, location data, or other details that can directly or indirectly reveal a person's identity
- "Processing" in the context of personal data refers to any action performed on the data—such as collecting, storing, using, sharing, altering, or deleting it—whether by automated or manual means
- Registered Company Number: SC063316
- Scottish Charity Number: SC014136

### **3. Who We Are**

3.1 Stills Ltd (Scottish Company No. SC063316 and Charity No. SC014136) operates as the data controller for any personal data you share with us. We are located at 23 Cockburn Street, Edinburgh EH1 1BP.

3.2 For any privacy-related questions, you can contact us at:  
[info@stills.org](mailto:info@stills.org) | 0131 622 6200

Exhibitions | Courses | Production Facilities | Creative Learning | Events

**Gallery** Tues – Sat, 12-5

**Technical Facilities** Tues, Fri, Sat, 12-5 | Weds, Thurs 12-9

[www.stills.org](http://www.stills.org)

## 4. Commitment to Data Protection

4.1 Stills is registered with the Information Commissioner's Office and complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

4.2 We work with trusted third-party service providers to help us deliver services like ticketing and donations. These providers process your data only on our instructions and are not allowed to use your data for their own purposes.

## 5. How We Collect Your Data

5.1 We may collect your personal information when you:

- Book tickets, workshops or courses (online, in person, or by phone)
- Give us your email for a receipt at the shop
- Sign up to our mailing lists or create an online account
- Donate or become a member
- Visit our premises (e.g. via CCTV for security)
- Engage with us on social media or send us feedback
- Apply for jobs, residencies or other opportunities

5.2 We may also receive personal data about you from trusted partners, but only when there is a lawful reason to share it.

## 6. What We Collect

Depending on your interaction with us, we may collect:

- Your name and contact details (email, phone, address)
- Your purchase or donation history
- Details you provide in feedback or queries
- Your online account credentials
- Preferences (e.g. communications or accessibility needs)

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We only collect and process sensitive personal data (such as access needs) where necessary and with your explicit consent.

## **7. Why We Use Your Information**

7.1 We process your personal data in accordance with the UK GDPR and the Data Protection Act 2018 on the following legal bases:

- Contractual necessity – to manage bookings and deliver services
- Legal obligations – to meet regulatory or financial requirements
- Legitimate interests – to understand and improve our services and audience engagement
- Consent – to send you marketing communications or process special category data (for example access or dietary needs)

7.2 Examples of how we use your data include:

- Confirming bookings or changes to events
- Providing customer service and responding to queries
- Sending newsletters or information about future events (if opted in)
- Monitoring and improving visitor experience

We use visible CCTV dummy cameras as a deterrent to enhance on-site security. These devices do not record, store or transmit any images or data and therefore do not process personal data. This measure is currently part of our insurance strategy and is under review by our board of trustees (as of July 2025).

7.3 We only process sensitive data (like access needs) when necessary and with your explicit permission.

## **8. Marketing Preferences**

8.1 We will only send you marketing communications (via email or post) if you have actively given us permission online or in person.

8.2 You can opt out or update your preferences at any time by:

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- Clicking the unsubscribe link in any email
- Logging in to your online account
- Contacting us directly

8.3 Even if you opt out of marketing, we may still contact you with essential information (e.g. booking updates). This would fall under contractual obligation and would not be promotional.

## **9. Data Security**

9.1 We are committed to protecting your personal data. Our secure servers and systems safeguard your details.

9.2 Where you make online payments through our site, your payment information is encrypted using SSL (Secure Socket Layer) technology.

9.3 Only authorised staff and contractors have access to your data, and we take all reasonable steps to protect it from loss, misuse, or unauthorised access.

## **10. Data Retention**

10.1 We keep your personal information only for as long as necessary for the purposes for which it was collected, including legal and financial reporting.

10.2 Typically, customer data is retained for up to six years after your last interaction with us. We may anonymise data for research or statistical purposes, in which case we may retain it indefinitely without identifying you.

## **11. Sharing Your Data**

11.1 We will not sell or share your personal data for marketing purposes without your consent.

11.2 We do not transfer your personal data outside the UK or the EEA. If such transfers become necessary, we will ensure appropriate safeguards are in place such

as standard contractual clauses or adequacy decisions, in line with UK GDPR requirements.

11.3 If you book an event hosted by a partner organisation, we may ask for your permission to share your contact details with them for their own marketing. You can choose whether to opt in.

## 12. If you are under 18

When someone purchases a product or subscribes to our mailing list, we may ask them to confirm that they are aged 16 or over. In certain cases, we may collect and manage personal data of individuals under 18. We will only retain the personal data of children when it is necessary to provide them with specific, requested information—such as course details, gift or membership materials. In cases involving children under 13, we will obtain consent from a parent or legal guardian before processing any personal data, in line with UK data protection law.

We do not contact children on our database for any reason other than to provide information directly related to their involvement with Stills—for example, course timetables, events they are participating in through Stills School, membership updates, or details relating to an associated purchase.

## 13. Your Rights

13.1 You have legal rights over your personal information. These include:

- Accessing the personal data that we hold about you
- Requesting correction or deletion of your data
- Objecting to how we use your data (e.g. for direct marketing)
- Requesting data portability
- Restricting or withdrawing your consent

13.2 To exercise your rights, please contact us at [info@stills.org](mailto:info@stills.org). We may need to verify your identity before acting on your request.

## 14. Photography and Videography

14.1 Please be aware that photography and videography may take place within Stills during public and private events. By entering the premises, you consent to being photographed, filmed, or otherwise recorded, where such activity is clearly signposted or where it is reasonable to expect.

14.2 We (or approved third parties such as event organisers or media outlets) may capture images or recordings for promotional, archival, security, or journalistic purposes. This content may be used on our website, social media channels, marketing materials, or shared with press/media partners. Such processing is carried out based on our legitimate interests in promoting and documenting our events, unless a stronger individual interest overrides this.



14.3 Where photography or filming is taking place in a clearly defined area (e.g. for an event), signage will be displayed. If you prefer not to be included in any recordings, please speak to a member of staff — we will make reasonable efforts to respect your preferences, though complete exclusion in large crowd settings cannot always be guaranteed.

14.4 In accordance with UK data protection laws, if you are identifiable in any photo or recording and wish to exercise your rights (e.g. request removal, access, or restriction), please contact us at [info@stills.org](mailto:info@stills.org).

## 15. Concerns or Complaints

15.1 If you have a concern about how we use your data, we encourage you to contact us directly so we can resolve it.

15.2 You can also contact the Information Commissioner's Office (ICO) if you are not satisfied with our response:

-  [www.ico.org.uk/concerns](https://www.ico.org.uk/concerns)
-  ICO Helpline: 0303 123 1113

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-  Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## 16. Policy Updates

16.1 We may update this Privacy Policy from time to time. When we do, we'll update the "last revised" date at the bottom of this page and notify users if appropriate.

[Last updated July 2025]