

## **Privacy Notice**

This Privacy Notice sets out the data processing practices and policies carried out through the use of the Internet and any of the professional services provided by Valkonen Visuals. Please note that all data thus captured will be used and held in accordance with the requirements of the GDPR (General Data Protection Regulation) which came into effect on 25th of May 2018.

### **How we use your information**

This privacy notice tells you what to expect when Valkonen Visuals collects personal information. It applies to information we collect about:

visitors to our website(s);  
any surveys we conduct;  
complainants and other individuals in relation to a data protection or freedom of information complaint or enquiry;  
people who use our professional services (including video research)

### **Website visitors**

When someone visits [www.valkonenvisuals.com](http://www.valkonenvisuals.com) we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is processed and presented anonymously. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

### **Use of cookies by Valkonen Visuals**

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

### **Search engines**

Any website search engines and input fields are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by either Valkonen Visuals or any third party in this way.

### **Security and performance**

Valkonen Visuals uses a third-party supplier, DigitalOcean, to host and maintain the security and performance of our website. To deliver this service it processes the IP addresses of visitors to the website. The relevant data centres for its cloud servers are based within the European Union.

### **People who email us**

Our email services use Transport Layer Security (TLS) to encrypt and protect email traffic. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

### **Project data delivery**

Clients are sent edited videos either directly via WeTransfer (wetransfer.com) to their email addresses, or else videos are hosted online for review using one of two video-sharing platforms vimeo.com and wipster.com. These files are uploaded as private or password protected links

### **Your consent**

By using this site and/or engaging Valkonen Visuals in providing a professional service, you agree to be bound by this Notice.

### **Right to access data**

Individuals have the right to access their personal data and supplementary information which Valkonen Visuals may hold about them. The right of access allows individuals to be aware of and verify the lawfulness of the processing.

Under the General Data Protection Regulation (GDPR), individuals will have the right to obtain:

confirmation that their data is being processed;  
access to their personal data; and  
other supplementary information

The GDPR clarifies that the reason for allowing individuals to access their personal data is so that they are aware of and can verify the lawfulness of the processing.

We will provide a copy of the information free of charge. However, we may charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive.

We may also charge a reasonable fee to comply with requests for further copies of the same information based on the administrative cost of providing the information.

Information will be provided without delay and at the latest within 5 working days of receipt.

We may need to extend the period of compliance where requests are complex or numerous. If this is the case, we will inform you within 48 hours of the receipt of the request and explain why the extension is necessary.

We will always verify the identity of the person making the request, using 'reasonable means'.

If the request is made electronically, we will provide the information in a commonly used electronic format.

The GDPR includes a best practice recommendation that, where possible, organisations should be able to provide remote access to a secure self-service system which would provide the individual with direct access to his or her information. Valkonen Visuals currently does not offer this facility however we are exploring options for the future.

Where we process a large quantity of information about an individual, the GDPR permits us to ask the individual to specify the information the request relates to.

The GDPR does not include an exemption for requests that relate to large amounts of data, but we may need to consider whether the request is manifestly unfounded or excessive.

### **Right to withdraw consent**

We will fully respect and act on any request to withdraw consent within 48 hours of such request. We will then confirm once the data has been removed and deleted or destroyed.

### **Right to object to processing**

Individuals have the right to object to:

processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);  
direct marketing (including profiling); and  
processing for purposes of scientific/historical research and statistics.  
Individuals must have an objection on “grounds relating to his or her particular situation”.

We will stop processing the personal data unless:

There are compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual;  
or the processing is for the establishment, exercise or defence of legal claims.  
We will inform individuals of their right to object “at the point of first communication” and in our privacy notice.

This will be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

### **Consent forms for video research**

In the case of for video-based research (vox pops interviews etc.) we ask participants to sign consent and release forms, which outline our obligations to them in terms of data privacy and GDPR.

### **Details of any international data transfer to 3rd countries**

We do not anticipate transferring data to countries outside of the EU except in those instances where we are conducting work outside of the EU on behalf of a European client or conducting work in Europe on behalf of a client based outside of the EU. In these instances,

GDPR regulations may not apply or if so, production data restrictions will be confirmed in advance with the client.

### **Data retention period & criteria for retention**

Personal data processed for any purpose shall not be kept for longer than is necessary for that completion of that purpose.

When we are supplied with customer data by a client in order to carry out a project on their behalf, we will retain this data securely for up to 2 years at which time, it will be reviewed and unless there is good reason for its retention, will be destroyed.

### **Right to port data**

The company will respect the right to port data to allow individuals to obtain and reuse their personal data for their own purposes across different services.

### **Right to erasure of personal data**

The company will normally fully respect the right for individuals to have personal data which the company holds, erased. Requests for erasure may be made verbally or in writing and will be acted on within 5 working days of receipt of the request. If there is any reason why the data cannot be erased, this will be communicated to the individual with 5 working days of the request for the erasure.

### **Right to rectify data held**

Individuals have the right to have inaccurate personal data rectified or completed if it is incomplete. Requests for rectification made be made verbally or in writing and the company will action any such request within 5 working days of the request.

### **Use of data processors**

Data processors include any third party suppliers who provide elements of our production and research services for us. We have contracts in place for any such data processors. This means that they cannot do anything with your personal information unless we have instructed them to do so. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

### **Complaints or queries**

Valkonen Visuals tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

### **Disclosure of personal information**

We will not disclose personal data without consent and we do not share our data with any outside organisations for marketing purposes, and only to carry out our professional services to a client or where processing for the management of that data by a registered, qualified and compliant data processor as may be required for research analysis purposes only.

### **Links to other websites**

This privacy notice does not cover the hyperlinks on our website linking to other external resources. We encourage you to closely review the privacy statements of any other 3rd party websites you visit.

### **Changes to this privacy notice**

We will conduct regular audits of this privacy notice and our policies and procedures in relation to the management of our data to ensure compliance and good business practice. This privacy notice was last updated on 15 January 2019.

### **How to contact us**

If you want to request any further information about our privacy policy, you can email us at [web@valkonenvisuals.com](mailto:web@valkonenvisuals.com) or write to: Valkonen Visuals, The Tara Building, Tara Street, Dublin, D02 F991, Republic of Ireland.