

Happy Days Creative School Photography Privacy Policy (UK)

Effective date: 10 September 2025

This Privacy Policy explains how Happy Days Creative ("we", "us", "our") collects and processes personal information in connection with our school photography services. It is provided to schools, parents or guardians, and students whose personal data we may process when delivering these services.

We comply with the UK GDPR, the Data Protection Act 2018, the Data Use and Access Act 2025, and the Privacy and Electronic Communications Regulations (PECR) as amended.

1) Who we are (Data Controller or Processor role)

Happy Days Creative

Unit 17, Grange Way Business Park, Colchester, Essex, CO2 8HF, United Kingdom

Email: support@happydaysphoto.co.uk

Website: <https://www.happydaysphoto.co.uk>

When we provide services on behalf of a school, the school is usually the Data Controller. We act as their Data Processor, following their instructions. When parents purchase photos directly from us, or we provide family accounts, we may also be a Data Controller for that processing.

2) What personal data we collect

We may process:

- Images and videos of pupils, staff, and where applicable, family members (photographs, class pictures, promotional shoots).
- Identity and contact data: name, email, phone, postal address (for order fulfilment and support).
- Class and group data: year group, class list, teaching staff names.
- Order and payment data: purchase history, delivery details, payment confirmations (payment card details are handled by our payment provider and not stored by us).
- Consent and permissions records provided by schools or parents or guardians.

3) How we obtain data

- From the school: class lists, consents, and information necessary to organise photography sessions.
- From parents or guardians: when ordering prints or digital images or creating an account.
- From photography sessions: images captured on the day.

4) Why we use your data (purposes and lawful bases)

We process personal data for the following purposes:

Purpose: Capturing and producing pupil photographs

Lawful basis: Public task (school functions) or Legitimate interests (school or parent), plus Consent where required

Purpose: Processing orders and delivering products to parents

Lawful basis: Contract (to fulfil purchase)

Purpose: Managing accounts and customer service

Lawful basis: Contract or Legitimate interests

Purpose: Maintaining safety and preventing unauthorised use of images

Lawful basis: Legitimate interests or Legal obligation

Purpose: Marketing to schools

Lawful basis: Legitimate interests

Purpose: Marketing to parents

Lawful basis: Consent (where required under PECR)

5) Facial recognition or biometric tools

If facial recognition is used to help sort images (for example, within our secure systems), we will only do so:

- under the school's written instruction, and or
- with explicit consent from the parent or guardian.

We do not use these technologies for marketing or unrelated profiling.

6) Who we share data with

We only share data where necessary:

- Schools (as controller) for administrative purposes.
- Service providers: secure cloud hosting, printing labs, payment processors, couriers.
- Legal authorities if required by law.

We do not sell personal data.

7) International transfers

Where suppliers are outside the UK, we use approved safeguards such as the UK IDTA or UK Addendum to EU Standard Contractual Clauses, in line with UK guidance and the Data Use and Access Act 2025.

8) Retention of images and data

- Individual and class photos: normally kept for 12 months unless otherwise instructed by the school.
- Orders and related data: 6 to 7 years (for accounting and tax).
- Consent records: retained as long as required to demonstrate compliance.
- Where parents purchase digital downloads, copies are available in their account for the stated period; after expiry, data is securely deleted.

9) Your rights

Under UK data protection law, parents or guardians (and in some cases pupils) have the right to:

- Access their data.
- Rectify inaccuracies.
- Request erasure (subject to school or contractual requirements).
- Restrict or object to processing.
- Withdraw consent where given.

Requests should be made via the school (where they are the controller) or directly to us at support@happydaysphoto.co.uk (where we are controller).

10) Security

We use secure systems, encryption, and restricted access to protect images and personal data. Staff are trained in safeguarding and data protection.

11) Children's data

We recognise the sensitivity of children's data. All images are handled with strict access controls, and we only process children's data with a lawful basis (usually the school's public task, or parental consent where required).

12) Contact and complaints

Questions or requests:

Email: support@happydaysphoto.co.uk

Post: Happy Days Creative, Unit 17, Grange Way Business Park, Colchester, Essex, CO2 8HF, United Kingdom

You also have the right to complain to the Information Commissioner's Office (ICO): <https://ico.org.uk>