

## **Privacy Notice for Photography and Videography**

July 2026



# Photography and Videography

Our core data protection obligations and commitments are set out in the [council's primary privacy notice](#) at [www.bolton.gov.uk](http://www.bolton.gov.uk)

This notice provides additional privacy information relating to Bolton Council's use of photography and videography.

It describes how we collect, use, store and share personal information when photographs and video recordings are taken by Bolton Council or by photographers and videographers acting on our behalf. It also explains the types of personal information we process, including information the law describes as special category data because of its sensitivity.

It is important that you read this notice together with any other privacy information we may provide on specific occasions when collecting or processing your personal information, so that you understand how and why we are using your information.

This notice does not apply to:

- CCTV operated by Bolton Council;
- Streetcare and environmental enforcement activities;
- Images collected as part of investigations, legal proceedings or regulatory functions;
- Personal photographs or videos taken by members of the public for domestic purposes; or
- Internal operational photographs which are not intended for publication or promotional use.

## Purpose(s)

Bolton Council may collect and use photographs and video recordings for the following purposes:

- Promoting Council services, events, activities and initiatives;
- Supporting tourism, regeneration, culture and economic development within the borough;
- Publishing information through Council websites, social media channels, publications and marketing materials;
- Communicating with residents, businesses, partners and visitors;
- Supporting media and publicity activities;
- Producing reports, presentations, strategies and other Council publications;
- Maintaining a record of Council activities and events;
- Celebrating achievements and recognising contributions from individuals, organisations and communities.

Where photography and filming take place at public events, we will seek to ensure attendees are made aware through signage, event communications, booking information or other appropriate means.

# Categories of personal data

The personal information processed may include:

## Photographs and Video Recordings

- Still images;
- Video footage;
- Audio recordings captured as part of video recordings;
- Images in which individuals can be identified directly or indirectly.

## Consent Records

Where consent is required, we may also process:

- Name;
- Address;
- Email address;
- Telephone number;
- Details of consent provided;
- Details of a parent, guardian or person with parental responsibility where consent is obtained on behalf of a child.

## Individuals Whose Information May Be Processed

This may include:

- Residents;
- Visitors;
- Service users;
- Customers;
- Event attendees;
- Children and young people;
- Volunteers;
- Councillors;
- Council employees;
- Representatives of partner organisations.

## Special Category Data

We do not routinely collect special category personal data through photography and videography activities. However, images may sometimes reveal information relating to:

- Physical or mental health;
- Disability or accessibility requirements;
- Racial or ethnic origin;
- Religious or philosophical beliefs;
- Other special category information visible within an image or recording.

Where such information is processed, Bolton Council will ensure an appropriate condition under UK GDPR and the Data Protection Act 2018 applies.

## Lawful basis for processing

Bolton Council processes photographs and video recordings primarily under:

### **Article 6(1)(e) UK GDPR – Public Task**

Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Council.

This includes:

- Promoting Council services and activities;
- Supporting community engagement;
- Supporting tourism, culture and economic development;
- Recording and documenting Council activities and events.

### **Article 6(1)(a) UK GDPR – Consent**

In some circumstances, Bolton Council may seek consent before taking or using a photograph or video recording. This may apply where:

- Individuals are the specific focus of photography or filming;
- Images are posed or arranged specifically for promotional purposes;
- A child is the primary subject of the image and consent is considered appropriate.

Where processing is based on consent, individuals may withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of processing undertaken before consent was withdrawn.

## Information sharing/recipients

Photographs and video recordings may be shared where necessary with:

- Relevant Council departments;
- Professional photographers and videographers acting on behalf of the Council;
- Design, marketing, publicity and event management providers;
- Printing and publishing companies;
- Website hosting and social media platforms;
- Partner organisations involved in jointly delivered services, projects or events;
- Media organisations, newspapers, broadcasters and other news outlets.

Where images are provided to media organisations or other external organisations for their own purposes, those organisations may act as independent data controllers and will be responsible for their own processing activities.

We will only share information where there is a lawful basis to do so.

## Automated Decisions

Bolton Council does not use automated decision-making or profiling in relation to photography and videography activities.

## Data retention/criteria

Photographs and video recordings will be retained in accordance with Bolton Council's Records Retention and Disposal Schedule and any applicable corporate policies.

Retention periods will vary depending on the purpose for which images or recordings were collected and whether they are required for operational, promotional, historical or archival purposes.

When information is no longer required it will be:

- Securely deleted;
- Securely destroyed; or
- Archived where there is a lawful basis to do so.

Retention periods are reviewed periodically to ensure information is not retained for longer than necessary.

## Rights of individuals

You have certain rights in relation to the council's use of your personal information.

To find out more about how these rights apply in particular circumstances, please refer to our [Guide to exercising your rights](#) which includes information about how to:

- exercise your rights
- contact our Data Protection Officer
- raise a concern with us
- make a complaint to the Information Commissioners Office (ICO)

If you wish to exercise your rights or to raise a concern about the handling of your personal information by the council, please [contact the Council's Data Protection Officer](#).

You also have the right to complain to the [Information Commissioner's Office](#) if you are unhappy about how we process your information. The ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or by telephone: 0303 123 1113

## Updates to Privacy Notice

We may update or revise this Privacy Notice from time to time and provide supplementary privacy information as is necessary to the Council's current workforce. If you are reading this as a printed copy please refer to [www.bolton.gov.uk](http://www.bolton.gov.uk) for the most up to date version