Marketing Image Library Privacy Notice

November 2026

v0.1	March 2024	First Draft	Marketing and Communications Manager	The Board	POL 047
v1.0	June 2024	Policy finalised following revision and review of draft, with amendments	Marketing and Communications Manager	The Board	POL 047
v1.1	November 2025	Policy updated to reflect upcoming transfers to new Irish office, and two amendments resulting from DUA Act 2025	Marketing and Communications Manager	The Board	POL 047
v1.2	November 2026	Policy reviewed as part of annual review.	Marketing and Communications Manager	The Board	POL 047

Marketing Image Library Privacy Notice

Clancy Group Holdings Limited and its associated companies The Clancy Group Limited, Clancy Plant Limited and Clancy Docwra Limited ("Clancy" or "we") are committed to protecting your personal information, as well as being transparent about the personal information collected, obtained and disclosed about you.

Notice

This Privacy Notice ("Notice") will inform you as to how we look after your personal data involved in the collection and maintenance of our corporate library of marketing and promotional images ("Marketing Image Library") and to ensure that all of our data protection obligations are met.

This Notice describes the categories of personal data that we collect, how we use your personal data, how we secure your personal data, when we may disclose your personal data to third parties, and when we may transfer your personal data outside of the United Kingdom.

This Notice also describes your rights regarding your personal data. We will only process your personal data in accordance with this Notice unless otherwise required by applicable law.

This Notice is reviewed annually by our Data Protection and Compliance Officer ("DPCO") or nominated person and will be monitored for compliance by the DPCO, and line managers/supervisors within their own area of responsibility. Routine audits will be carried out annually and may also include random and scheduled inspections by the DPCO. If you have any questions about this Notice, including any requests to exercise your legal rights, please contact our DPCO using the details set out below.

Controller: This Notice is issued on behalf of the Clancy Group so when we mention "Clancy", "we", "us" or "our" in this Notice, we are referring to the relevant company in the Clancy Group responsible for processing your data.

Who does this Notice apply to?

This Notice applies to all Clancy staff, third parties, and attendees at events who consent to be photographed or videoed (referred to as "you" in this Notice) for the purpose of the Marketing Image Library.

The data we collect about you

We take steps to ensure that the personal data that we collect about you is adequate, relevant, not excessive, and processed for limited purposes. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this Notice.

You agree to share your personal data (your image) with us when you sign the Clancy photography and videography consent form.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer the following different kinds of personal data about you in connection with the Marketing Image Library:

- Name; email address; record of your consent; image; date and description of photography; any personal data contained in your email if you submit your consent by email (together your "Image Data").

Use of personal data including our lawful bases for processing personal information

We only process your personal data where applicable law permits or requires it. We will use your Image Data (including your Image Special Category Data) for maintaining a library of images of Clancy staff; third parties on site; and attendees at events for promotional purposes.

We may process your personal data without your knowledge or consent where required by applicable law or regulation.

Our lawful basis for processing your Image Special Category Data is where you have manifestly made this data public yourself.

Our lawful basis for processing your Image Data is where you have provided your consent.
You will not be subject to decisions by Clancy based on automated data processing without your prior consent.

Collection and use of special categories of personal data

Special categories of personal data include details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data.

Data relating to criminal convictions and offences also receive special protection.

When you voluntarily provide your image, we may be able to determine your racial or ethnic characteristics visible in your image (your "Image Special Category Data").

When you voluntarily provide your image, we may be able to determine your race, ethnicity and other characteristics or visible medical condition. We may collect and process these special categories of personal data. We will only retain special categories of personal data for as long as necessary to fulfil the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes.

Who we share your personal data with externally

We will only disclose your personal data to third parties where required by law or to our contractors, designated agents, or third-party service providers which require such information to assist us with administering the relationship with you.

The recipient third parties are marketing and PR agencies and suppliers of other related services.

We require all of our third-party service providers to implement appropriate security measures to protect your personal data consistent with our policies and any data security obligations applicable to us as your employer. We do not permit our third-party service providers who process your personal data on our behalf to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes in accordance with our instructions.

When we disclose your personal data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal data necessary for the specific purpose and circumstances.

Data security

We take data protection seriously, and as such, we have internal policies/procedures (such as Data Protection Policy, Data Breach and Incident Management Policy, and Records Management Policy). We maintain operational, technical and physical safeguards designed to protect personal information against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use. We will store your personal data securely in a number of locations, including on Clancy sites and IT systems (including email and servers). The data of the server log files are stored separately from any personal data provided by users. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

Personal data from the Marketing Image Library is retained in a range of locations, including the Private Marketing folder on MS Office; and the One Clancy system.

We take your privacy very seriously and will never sell your data.

International transfers of personal information

We do not send any of your personal data from the Marketing Image Library outside of the European Union, which has an adequacy decision from the UK Government. We transfer such data to our office in the Republic of Ireland, which is part of the EU.

Data retention

Because they form part of Clancy's historical archive, the images in the Marketing Image Library are retained indefinitely.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you, subject to a reasonable and proportionate search of our records by us, and to check that we are lawfully processing it.

Request rectification of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy;

- Where our use of the data is unlawful, but you do not want us to erase it;
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; and or
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request the transfer of your personal data to you or to a third party (data portability). We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

If you wish to exercise any of the rights set out above, please contact the DPCO at Roland.Thomas@theclancygroup.co.uk

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

If you wish to exercise your rights and it relates to personal information you provided to another organisation that contracted with Clancy for Clancy to provide services to you, then you must exercise your rights directly with that organisation.

What we may need from you

We may request specific information from you to help us confirm your identity and your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally, it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Changes to this Notice and your duty to inform us of changes

We reserve the right to update this Notice at any time, and we will provide you with a new Notice when we make any updates. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with

notice and, where required by law, seek your consent before using your personal data for a new or unrelated purpose. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

We keep this Notice under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Contact details

If you have any questions about this Notice or how we handle your personal data, or would like to request access to your personal data, please contact our DPCO:

Roland Thomas at: roland.thomas@theclancygroup.co.uk

If you are unsatisfied with our response to any issues that you raise with us, you may have the right to make a complaint with to the Information Commission:
Information Commission
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Helpline Number: 0303 123 1113