

Cairn Media – Privacy Notice

Last updated: 23/10/2025

Contact details

Telephone: 07833775859

Email: info@cairnmedia.co.uk

Cairn Media is registered with the Information Commissioner's Office (ICO) as a data controller under registration number ZC022917.

This privacy notice tells you what to expect us to do with your personal information:

- What information we collect, use, and why
- Lawful bases and your data protection rights
- Children's privacy and safeguarding
- Where we get personal information from
- How long we keep information
- Who we share information with
- Sharing information outside the UK
- Security of your personal information
- Cookies and analytics
- Automated decision-making
- How to complain
- Updates to this notice

What information we collect, use, and why

We collect or use the following information to provide services and goods, including delivery:

- Names and contact details
- Addresses
- Payment details (including card or bank information for transfers and direct debits)
- Photographs or video recordings
- Records of meetings and decisions
- Information relating to compliments or complaints

We collect or use the following information for service updates or marketing purposes:

- Names and contact details

We collect or use the following personal information for dealing with queries, complaints or claims:

- Names and contact details
- Call recordings
- Relevant information from previous investigations
- Financial transaction information
- Correspondence

We collect or use the following information for media content:

- Photographs or video recordings

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)

- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collecting and use of your data

Our lawful bases for collecting or using personal information to provide services and goods are:

- Consent – permission after providing relevant information (you can withdraw at any time).
- Contract – necessary to enter into or perform a contract with you.
- Legitimate interests – necessary for our business and your expectations, without undue risk. Our legitimate interests are:

We process personal information as a professional film and photography business to provide commissioned creative services to clients. This includes collecting and using contact and project details in order to respond to enquiries, plan and deliver productions, and manage contracts, communication, and payments. The data we collect is limited to what is necessary, handled securely, and used only for these purposes. We also maintain relationships with clients and industry contacts, which may include occasional relevant follow-ups with an easy opt-out. We monitor and improve website performance using analytics data (aggregated or pseudonymised where possible). We retain completed project materials, including creative assets and production records, for portfolio, reference and rights management, used only in accordance with agreed permissions.

Our lawful bases for collecting or using personal information for service updates or marketing purposes are:

Legitimate interests – to maintain professional relationships with existing clients and industry contacts by providing relevant information about services or updates, kept infrequent and professional, with a simple way to opt out at any time.

Our lawful bases for collecting or using personal information for dealing with queries, complaints or claims are:

Legal obligation – where we must retain or process information to comply with the law (e.g., tax, legal or insurance requirements). Legitimate interests – to respond to enquiries, investigate and resolve complaints, and manage or defend legal claims; processing is limited to what is necessary.

Our lawful bases for collecting or using personal information for media content are:

- Consent – written permissions or appearance releases where individuals feature in content (withdrawal respected where feasible).
- Contract – to plan, produce and deliver commissioned work under a client agreement.
- Legitimate interests – to produce, deliver and showcase creative projects, document work and manage rights usage, balanced against individuals' rights and expectations.

Children's privacy and safeguarding

Cairn Media sometimes collects and processes personal information relating to children and young people under the age of 18 as part of our professional film and photography work. This may include capturing a child's image, voice, or name during commissioned projects or events.

We only process children's personal information when it is lawful to do so and with appropriate safeguards in place. In most cases, this will be based on written consent from a parent, guardian, or the relevant organisation (such as a school, event organiser, or production company). Where consent is given through an organisation, we rely on that organisation to ensure necessary permissions have been obtained.

Any filming or photography involving minors is carried out sensitively and securely, and only for the agreed purposes of the project. We do not publish, share, or reuse identifiable images of children without valid consent or other lawful basis.

All personal data collected in connection with children is stored securely, limited to authorised personnel, and retained only for as long as necessary to fulfil the project purpose or comply with legal or safeguarding requirements.

We have considered the ICO's Children's Code (Age-Appropriate Design Code) and ensure that online content, consent processes, and communications that could involve or be accessed by children are clear and age-appropriate. Parents or guardians can contact us at any time with questions or to exercise rights regarding a child's data.

Where we get personal information from

- Directly from you (website forms, email, phone, social media).
- Councils and other public sector organisations (where relevant to commissioned work).
- Publicly available sources (where appropriate for professional contact).
- Suppliers and service providers.
- Third parties (e.g., clients providing participant lists, consent forms, or project details).

How long we keep information

We retain personal data only for as long as necessary. Full details are set out in our Data Retention Schedule below.

Cairn Media – Data Retention Schedule

Type of Data	Purpose of Processing	Retention Period	Action at End of Period
Enquiry & contact form data (name, email, message)	Respond to enquiries and quotes	12 months from last contact	Delete from Wix, mailbox and notes
Client project files & correspondence (briefs, contracts, call sheets, emails)	Plan, produce and deliver projects; evidence of instructions	6 years after project completion	Secure deletion or restricted offline archive if legally required
Contributor release forms & consent documents	Proof of consent and usage rights; model/appearance releases	Duration of usage rights or minimum 6 years	Retain in restricted archive; delete when rights expire
Media assets (photos, video, audio, metadata)	Project fulfilment, portfolio and rights management	As long as content remains in use/licence; review every 2 years	Delete or archive securely; honour withdrawal of consent where applicable
Financial & invoicing records (names, addresses, invoice details)	Accounting and tax compliance	6 years from end of financial year (statutory)	Delete securely after statutory period
Supplier/contractor details (names, contact, invoices, agreements)	Payments and professional relationship management	6 years after last engagement	Delete securely
Analytics & website usage data (Google Analytics)	Website performance and improvement	14 months (property setting)	Automatically deleted or anonymised by provider
Cookie consent records	Demonstrating consent under PECR/UK GDPR	12 months	Deleted automatically or by scheduled purge
Email marketing / client updates (opt-in lists)	Service updates to existing clients and contacts	Until opt-out or 2 years after last interaction (whichever is sooner)	Remove from mailing list and backups in next cycle
Legal/insurance, complaints & claims records	Establish, exercise or defend legal claims; handle complaints	Up to 6 years from closure (or longer if litigation is ongoing)	Delete securely once limitation period ends

Who we share information with

Data processors: Wix.com – website hosting and contact forms; Google LLC – email, analytics and cloud storage; accounting software – invoicing; freelance collaborators – production support.

What our data processors do: Wix.com hosts and manages our website and contact forms, Google LLC provides our email, analytics and cloud storage, and our accounting software processes invoices and financial data. We also use trusted freelance collaborators for editing and production support when required. All processors handle data securely and only for the purposes instructed by us.

Others we share personal information with: Professional or legal advisors; organisations we are legally obliged to share information with; suppliers and service providers; and other relevant third parties where necessary to plan, deliver or review commissioned work. Third parties receive only the data needed for the task and must handle it securely and in accordance with data protection law.

Sharing information outside the UK

Where necessary, we transfer personal information outside of the UK. When doing so, we comply with the UK GDPR and ensure appropriate safeguards are in place.

Organisation name: Wix.com Ltd – Category: Website hosting and contact form provider (technology services) – Countries: European Union and United States – Transfer mechanism: UK Addendum to the EU Standard Contractual Clauses (SCCs).

Organisation name: Google LLC – Category: Email, analytics and cloud storage provider (technology services) – Country: United States – Transfer mechanism: UK Addendum to the EU Standard Contractual Clauses (SCCs).

Security of your personal information

We use appropriate technical and organisational measures to protect personal information against unauthorised access, alteration, disclosure, or destruction. Access is restricted to authorised personnel only. Electronic systems are password-protected and stored on secure platforms (e.g., Wix and Google Workspace) and data is transmitted over encrypted connections (HTTPS).

Cookies and analytics

Our website uses cookies and similar technologies to improve functionality and analyse traffic through Google Analytics. Cookies collect anonymous or pseudonymous data such as visitor numbers, time on site, and pages viewed. You can manage or disable cookies through your browser settings at any time. Non-essential cookies (e.g., analytics) are used only with your consent via our cookie banner.

Automated decision-making

Cairn Media does not use personal information for automated decision-making or profiling that produces legal or similarly significant effects.

Responsible for data protection

The owner of Cairn Media is responsible for overseeing data protection compliance and can be contacted using the details above for any questions or concerns about this Privacy Notice.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice. If you remain unhappy after raising a complaint with us, you can also complain to the Information Commissioner's Office (ICO):

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

Helpline: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Updates to this notice

We may update this Privacy Notice from time to time to reflect changes in our practices or for legal reasons. The latest version will always be published on our website.