

# Privacy Notice

Version dated 2026-07-02.

## PLAIN SUMMARY

This notice explains how the Photographer handles personal data for TFP collaborations, document signing, image delivery, publication approval, and ordinary photography-related communication.

For signed document packages, this version applies when it is provided together with the TFP agreement, model release, or client release.

## CONTROLLER

The Photographer acts as the controller for personal data connected with these activities.

Contact: [ignat@lumora.fi](mailto:ignat@lumora.fi)

## WHAT MAY BE PROCESSED

Personal data may include name, contact details, messages, scheduling details, shoot notes, age-verification notes, signed documents, image filenames or IDs, publication approvals, privacy limits, delivered files, archive records, and photographs created during a session.

The Photographer does not normally keep a copy of an identification document after age verification unless required by law or separately agreed in writing.

## PURPOSES AND LAWFUL BASES

Communication, planning, scheduling, image delivery, and administration of a collaboration are processed because they are necessary for the agreement or steps requested before entering it.

Age-verification notes, documentation, archive records, rights-management records, and records needed to answer questions, handle claims, or deal with legal issues are processed on the basis of the Photographer's legitimate interests in safe working practice, authorship, archive management, rights protection, and legal record keeping, or legal obligations where applicable.

Publication of approved images is processed on the basis of the Photographer's legitimate interests in artistic and professional publication, portfolio use, exhibitions, press, editorial use, rights management, and authorship protection, supported by a written model release.

Some intimate, nude, or identifying images may require an additional condition under data protection law if they are treated as special-category personal data. This notice does not replace legal advice on that question.

## WHO MAY ACCESS DATA

Access is limited to the Photographer and necessary service providers used for storage, backup, delivery, communication, website hosting, and publication support.

Service providers acting as processors are used under data processing agreements as required by applicable data protection law.

Publication partners, platforms, galleries, magazines, editors, or similar recipients may act as independent controllers for their own publication activities.

## **RETENTION**

Records may be kept as long as reasonably needed for artistic, legal, rights-management, backup, archive, or record-keeping purposes.

Delivered files, signed releases, publication approvals, and rights-management records may be kept for a long period because they help document authorship, permissions, publication history, and legal rights.

## **DATA SUBJECT RIGHTS**

You may have rights under applicable data protection law, including rights to access, correct, delete, restrict, transfer, object to, and receive information about personal data.

These rights may be limited where the Photographer has stronger legal, authorship, archive, rights-management, or freedom-of-expression interests.

To ask a privacy question or make a data request, contact [ignat@lumora.fi](mailto:ignat@lumora.fi).

## **CHANGES**

This notice may be updated from time to time. For signed document packages, the relevant version is the Privacy Notice version provided with the package, unless the Parties agree otherwise in writing.