



# Privacy Policy

**Thor Visuals** • Effective Date: January 1, 2026

## 01. Introduction

Thor Visuals ("we," "us," "our") is dedicated to capturing your moments while respecting your privacy and protecting your personal data. This policy explains how we collect, use, and safeguard your information when you visit our website or work with us, in compliance with the General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), and the California Online Privacy Protection Act (CalOPPA).

## 02. Who is Responsible?

For the purposes of data protection laws, the Data Controller is Thor Visuals. We operate in both California, USA and Sweden (EU), and we are responsible for your personal data. If you have any questions, concerns, or wish to exercise your privacy rights, you can contact us directly at [privacy@thorvisuals.com](mailto:privacy@thorvisuals.com).

## 03. Data Collection

We believe in data minimization. We only collect information that is strictly necessary for our photography services, artistic portfolio, and website operation as listed below:

- **Contact Details** such as your name, email, and phone number.
- **Visual Data** such as photographs, videos, and visual likeness.
- **Transaction Data** such as invoices, contracts, and payment history.
- **Technical Data** such as your IP address, browser type, and device information.

We process your personal information based on the following legal grounds:

- **Contract Fulfillment:** To take, edit, and deliver photos as contractually agreed.
- **Legitimate Business Interests:** To archive your photos, manage our creative brand, and maintain our artistic portfolio.

- **Consent:** We will only use your images for advertising, social media, or public portfolios if you have signed a Model Release or given us explicit permission.
- **Legal Compliance:** To maintain records as required by California and Swedish law.

## 04. Data Sharing

We do not sell, trade, or rent your personal identification information to others. We do not share your data with third parties for their direct marketing purposes. However, we may share necessary data with trusted third-party service providers ("Data Processors") who help us run our business and are contractually bound to protect your data.

- **Image Galleries:** We use online galleries and/or storage providers to deliver your photos.
- **Invoicing & Payments:** For paid assignments, we use financial platforms (e.g., invoicing tools or umbrella companies) to handle payments and comply with tax laws.
- **Communication:** We use email and other communication tool providers to manage our correspondence.

## 05. Biometric Data

While we may hold high-resolution images of your face, we do not use facial recognition software or process your images to uniquely identify you.

## 06. Data Retention

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected.

- **Contact Details:** Retained until our business is concluded, plus a reasonable period for customer service, unless you request deletion sooner.
- **Visual Data:** Retained indefinitely as part of our artistic body of work and historical archive (Artistic Purpose).
- **Transaction Data:** Retained for the period required to comply with applicable tax laws and legal statutes of limitation.

- **Technical Data:** Retained only for the limited time necessary to ensure website security and proper functionality, after which it is deleted or anonymized.

## 07. Data Security

We take the security of your personal information seriously. To prevent unauthorized access or disclosure, we use trusted, industry-standard security measures, including Two-Factor Authentication (2FA) on our accounts and HTTPS encryption on our website. We also restrict access to your data to ensure it is only used for the purposes outlined above.

## 08. Cookies & Tracking

We do not use tracking, analytics, or advertising cookies. Our website uses only Strictly Necessary Cookies which are essential for the site to function (e.g., security tokens, session identifiers). Because these cookies are strictly necessary for the service you requested (loading the website), they are exempt from consent requirements under GDPR and CCPA. We do not use third-party trackers like Google Analytics or Facebook Pixels.

## 09. International Data Transfers

Because we operate in both the United States and Sweden, your information may be transferred between and processed in both jurisdictions. By using this site or engaging our services, you acknowledge this transfer. For transfers from the EU to the US, we rely on Article 49 GDPR Derogations regarding the necessity of the transfer for the performance of a contract.

## 10. Your Privacy Rights

Whether you are in California or Sweden, we extend the following rights to you. To exercise these rights, simply email [privacy@thorvisuals.com](mailto:privacy@thorvisuals.com).

- **Access:** You can request a copy of the personal data we hold about you.
- **Correction:** You can ask us to fix incorrect data.

- **Deletion:** You can ask us to delete your data. Note: Deletion of images may be limited by our rights to freedom of expression (Artistic Purpose) or contractual obligations (Model Releases).
- **Non-Discrimination:** You will not be discriminated against for exercising any of your privacy rights.
- **Objection:** You can object to the processing of your data.
- **Right to Complain:** If you feel we have not respected your privacy rights, you have the right to lodge a complaint with the California Privacy Protection Agency (CPPA) or the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten).

## 11. Children's Privacy

Our website and services are not directed at children under the age of 13. We do not knowingly collect personal data from children under 13. If you are a parent or guardian and believe your child has provided us with personal data without your consent, please contact us directly at [privacy@thorvisuals.com](mailto:privacy@thorvisuals.com) to have it removed. If you are under 18 years of age, a parent or legal guardian must sign your Model Release and/or contract. We only process personal data of minors with this explicit parental consent.

## 12. External Links

Our website may contain links to other websites and social media platforms. Clicking these links may allow third parties to collect data about you. We do not control these third-party sites and are not responsible for their privacy statements.

## 13. Changes to This Policy

We reserve the right to modify this privacy policy at any time. Changes will be posted on our website with an updated effective date. For significant changes that affect your rights, we may also notify you via email if we have your contact information on file. Your continued use of the website or our services after such changes constitutes acceptance of the new policy.