



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

November 14, 2025

Jennifer Leyden  
Senior Vice President and Chief Financial Officer  
Getty Images Holdings, Inc.  
605 5th Ave. South  
Suite 400  
Seattle, WA 98104

**Re: Getty Images Holdings, Inc.**  
**Form 10-K for Fiscal Year Ended December 31, 2024**  
**File No. 001-41453**

Dear Jennifer Leyden:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance  
Office of Trade & Services