

# Haverhill Town Council

## Privacy Policy



HAVERHILL  
TOWN COUNCIL

## 1 Policy Statement

### Purpose of policy

- a) We are committed to protecting your personal information and being transparent about what information we hold about you.
- b) Using personal information allows us to develop a better understanding of the people to whom we provide services and in turn to provide you with relevant and timely information about the work that we do. It also helps us to engage with potential donors and supporters.
- c) The purpose of this policy is to give you a clear explanation about how we (**Haverhill Town Council, Haverhill Community Trust, ONE Haverhill Partnership, Haverhill in Bloom**) collect, and use the information we collect from you directly and from third parties.
- d) We use your information in accordance with all applicable laws concerning the protection of personal information. This policy explains:
  - What information we may collect about you
  - How we may use that information
  - In what situations we may disclose your details to third parties
  - Our use of cookies to improve your use of our website
  - Information about how we keep your personal information secure, how we maintain it for and your rights to be able to access it
- e) If you have any queries about this policy, please contact the Data Protection Officer at Haverhill Town Council or email: [DPO@haverhill-tc.gov.uk](mailto:DPO@haverhill-tc.gov.uk)

## 2 Who we are

- a) **Haverhill Town Council** is the local parish council and carries out a range of statutory, civic and public functions. It runs Haverhill Arts Centre in the old town hall, which is managed by Haverhill Community Trust.
- b) **Haverhill Community Trust** is a registered charity in England and Wales, **288092** its object is to do anything for the benefit of Haverhill and its people. As well as managing the town hall and the Leiston Community Centre, the Trust supports small organisations in their charitable work locally. Haverhill Town Council is the sole trustee of the charity.
- c) **The ONE Haverhill Partnership** which is a partnership of organisations working to make Haverhill a better place to live, visit and work. The Partnership is facilitated by Haverhill Town Council. It hold the funds and is the owner of the website. Individual projects delivered under the ONE

Haverhill Partnership brand belong to the lead partner for that project and therefore any data processing is the responsibility of that partner.

- d) **Haverhill in Bloom** is part of Haverhill Community Trust and provides floral displays around Haverhill.
- e) Our websites are

[www.haverhill-tc.gov.uk](http://www.haverhill-tc.gov.uk)

[www.haverhillartscentre.co.uk](http://www.haverhillartscentre.co.uk)

[www.onehaverhill.co.uk](http://www.onehaverhill.co.uk)

[www.haverhillinbloom.org.uk](http://www.haverhillinbloom.org.uk)

### 3 Information collection

We collect various types of information and in a number of ways:

**a) Information you give us**

For example when you register on our the Haverhill Arts Centre website, buy tickets or make a donation, we'll store personal information you give us such as your name, email address, postal address, telephone number and card details. We will also store a record of your purchases and donations. On our other websites we only collect personal information if you intentionally complete a contact form. All our websites use cookies (see below).

**b) Information about your interactions with us**

For example, when you visit our websites, we collect information about how you interact with our content and ads. When we send you a mailing we store a record of this, and in the case of emails sent through a third party provider we keep a record of which ones you have opened and which links you have clicked on.

**c) Information from third parties**

We might receive information about you from third parties. For example, we may use third party research companies to provide general information about our customer base, compiled using publicly available data.

**d) Sensitive personal data**

Data Protection law recognises that certain categories of personal information are more sensitive such as health information, race, religious beliefs and political opinions. We do not usually collect this type of information about individuals unless there is a clear reason for doing so. (As an example, we may collect information in respect of a query about council services or a request from you for help in resolving a problem)

### 4 Legal basis

There are six bases under which we may process your data:

**a) Contract purposes**

When you make a purchase from us or make a donation to us, you are entering into a contract with us. In order to perform this contract we need to process and store your data. For example we may need to contact you by email or telephone in the case of cancellation of a show, or in the case of problems with your payment.

**b) Legitimate business interests**

We collect and process your personal for purposes that are in our legitimate organisational interests. However we only do this if there is no overriding prejudice to you by using your personal information in this way.

**c) With your explicit consent**

For any situations where the two bases above are not appropriate, we will instead ask for your explicit consent before using your personal information in that specific situation.

**d) Public Interest**

When processing is necessary for us to perform a task in the public interest or for official functions, and the task or function has a clear basis in law.

**e) Legal Obligation/Statutory Duty**

When the processing is necessary for us to comply with the law (not including contractual obligations)

**f) Protect the Vital Interests of the Data Subject**

When processing is necessary to protect someone's life.

## 5 Marketing communications

- a) We aim to communicate with you about the work that we do in ways that you find relevant, timely and respectful. To do this we use data that we have stored about you, such as what events you have booked for in the past, as well as any preferences you may have told us about.
- b) We use our legitimate organisational interest as the legal basis for marketing communications by post and email. In the case of postal mailings, you may object to receiving these at any time using the contact details at the end of this policy. In the case of email from the arts centre, we will give you an opportunity to opt out of receiving them during your first purchase with us. If you do not opt out, we will provide you with an option to unsubscribe in every email that we subsequently send you, or you can alternatively use the contact details at the end of this policy.
- c) We may also contact by telephone. If it is solely for marketing purposes, we will always get explicit consent from you before doing this. Please bear in mind that this does not apply to telephone calls that we may need to make to you related to council business or your purchases.

## 6 Other processing activities

- a) In addition to marketing communications, we also process personal information in the following ways that are within our legitimate organisational interests:
  - i. In order to carry out our statutory function as a local council.
  - ii. We may analyse data we hold about you to ensure that the content and timing of communications that we send you are as relevant to you as possible.
  - iii. We may analyse data we hold about you in order to identify and prevent fraud.
  - iv. In order to improve our websites we may analyse information about how you use it and the content and ads that you interact with.

- v. We may use profiling techniques or third party wealth screening and insight companies to provide us with information about you that will help us to communicate in a relevant way with you, in particular when we are approaching you about potential philanthropic support. Such information is compiled using publicly available data about you.
- b) In all of the above cases we will always keep your rights and interests at the forefront to ensure they are not overridden by our own interests. You have the right to object to any of this processing at any time. If you wish to do this, please use the contact details at the end of this policy. Please bear in mind that if you object this may affect our ability to carry out tasks above that are for your benefit. This does not apply to circumstances in which we are legally obliged or have a statutory duty to process data about you.
- c) We will not process any data relating to a child (under 13 years) without express parental/guardian consent of the child concerned.

## 7 Third parties

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows:

- a) When it is necessary for them to be able to provide you with assistance, information, services or products that you've requested.
- b) To our own service providers who process data on our behalf and on our instructions. This includes Hartseats, our subsidiary catering company that operates the café, bar and services functions and Spektrix, our ticketing system software provider.
- c) In all cases we require that third parties comply strictly with our instructions and with data protection laws, for example around security of personal data.
- d) Where we are under a duty to disclose your personal information in order to comply with any legal obligation, for example to government bodies and law enforcement agencies.
- e) For arts centre customers, visiting performances companies whose performances you have attended and who subsequently request your data. In these cases we will always ask for your explicit consent before doing so.

## 8 Cookies

- a) Cookies are small text files that are automatically placed onto your device by some websites that you visit. They are widely used to allow a website to function (for example to keep track of your basket) as well to provide website operators with information on how the site is being used.
- b) On the Haverhill Arts Centre website we use cookies to keep track of your basket as well as to identify how the website is being used and what improvements we can make. The cookies used for these functions are temporary cookies that are removed once the transaction has been completed or you log out. It is not possible to purchase anything on our website without accepting these cookies.
- c) Our websites use the following non-essential cookies:

**i. Google Analytics cookies**

These cookies are used to collect information about how visitors use our sites. The cookies collect information in an anonymous form, so we don't know who is using our sites. We use the information on how people use our website to compile reports and to help us improve our sites.

You can go to <http://www.google.com/analytics/learn/privacy.html> to find out more about Google Analytics cookies and how to opt-out of them.

**ii. Email and web tracking cookies used by Haverhill Town Council**

These cookies are used to collect information about how visitors who have subscribed to our email lists are using our websites. This data is not anonymised and we use the information to help improve our email communications and target specifically-tailored messages for our email subscribers.

**iii. Cookies used by Twitter and Facebook**

These cookies provide information on visitors to Twitter and Facebook, check whether users are logged in to either platform and sets application cookies for Twitter and Facebook.

This website also uses advertising cookies and we offer the option to opt out of these to prevent them being set on your computer.

For more information on cookies, please visit:

[aboutcookies.org](http://aboutcookies.org)

[Wikipedia](https://en.wikipedia.org/wiki/Cookie_(computing))

Please note that we are not responsible for information available on these websites

## 9 Your debit and credit card information

- a) If you use your credit or debit card to purchase from us or to make a donation, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS). You can find more information about this standard here. [http://www.theukcardsassociation.org.uk/security/what\\_is\\_PCI%20DSS.asp](http://www.theukcardsassociation.org.uk/security/what_is_PCI%20DSS.asp)
- b) We may optionally allow you to store your card details for use in a future transaction. This is carried out in compliance with PCI-DSS and in a way where none of our staff members are able to see your full card number. We never store your 3 or 4 digit security code.

## 10 Maintaining your personal information

- a) In respect of council work, we will only keep your data for the purpose it was collected for and only for as long as is necessary, after which time it will be deleted. In terms of statutory records such as minutes of meetings, these are permanent records that must be retained by law.
- b) In respect of the arts centre, we store your personal information indefinitely such that for any subsequent purchases you make we are able to link them back to a single unique arts centre record that we hold for you on our system. This is entirely separate to any other record we hold about you.
- c) If there are aspects of any of our records that are inaccurate or that you would like us to remove, you can contact us to request this using the contact details at the end of this policy.
- d) Arts Centre customers can edit their own records by logging on to their account.

## 11 Security of your personal information

We have put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible. We will ensure that any third parties we use for processing your personal information do the same.

We will not transfer, process or store your data anywhere that is outside of the European Economic Area.

## 12 Your rights to your personal information

- a) You have a right to request a copy of the personal information that we hold about you.
- b) If you believe that the information we hold about you is incorrect you can contact us to update it and keep your data accurate.
- c) If you believe your data is not being processed for the purpose it has been collected for, you may object.
- d) If you have a complaint regarding the way your personal data has been processed you may make a complaint directly to us or to the Information Commission.

You can do the above actions by contacting our Data Protection Officer. Please use the contact details at the end of this policy if you would like to exercise this right.

## 13 Contact details and further information

Please get in touch with us if you have any questions about any aspect of this privacy policy, and in particular if you would like to object to any processing of your personal information that we carry out for our legitimate organisational interests.

The Data Protection Officer, Haverhill Town Council, Haverhill Arts Centre, High Street, Haverhill, CB9 8AR  
[DPO@haverhill-tc.gov.uk](mailto:DPO@haverhill-tc.gov.uk)

The Information Commissioner's Office [casework@ico.org.uk](mailto:casework@ico.org.uk) Tel 0303 123 1113