Privacy Policy

Harwich Festival and Harwich Arts & Heritage Centre
Policy 07 | Version 2.0 | Revised 25 October 2026
Owner: General Manager | Scheduled review: 25 October 2027

Who we are and how to contact us

The Harwich Festival, registered charity 1171712, operates Harwich Arts & Heritage Centre and organises cultural, artistic and community activities. We are the controller of personal information we use for our own activities. Independent hirers and partners may be separate controllers of information they collect for their own groups.

Contact the General Manager at contact@harwichfestival.com, telephone 01255 319191, or write to Harwich Festival, Harwich Arts & Heritage Centre, Main Road, Dovercourt, Essex, CO12 4AJ. Use these details for privacy questions, data-rights requests or complaints. This notice covers enquiries, bookings, activities, volunteering, donations and communications. Staff and applicants must also receive information specific to their employment or recruitment.

Information we use and where it comes from

Depending on your contact with us, we may use your name, contact details, booking or payment information, correspondence, volunteering details, participation information, feedback, photographs or recordings. Where necessary, we may receive access, health, emergency-contact or safeguarding information. Only disclose sensitive information that is relevant; we may ask to discuss it through a more secure route.

We usually receive information directly from you, a parent, carer or authorised representative, or through booking, payment and communications services. We may also receive relevant information from activity organisers, delivery partners or statutory agencies. When receiving information indirectly, we will provide the privacy information required by law, unless a lawful exemption applies.

Purposes and lawful bases

- Enquiries, ordinary administration and service improvement: our legitimate interests in running the charity and responding to people, after considering their rights and reasonable expectations.
- Bookings, room hire, purchases and agreed services: steps to enter or perform a contract with you, where you are a party; otherwise the appropriate legitimate interest in administering the arrangement.
- Volunteering and routine activity administration: legitimate interests, with consent for genuinely optional uses where appropriate.
- Accounting, employment, regulatory reporting and other duties: legal obligations where an applicable law requires the processing.
- Newsletters and optional promotional communications: consent, with an unsubscribe route. We will not rely on a marketing exception unless we have checked and documented that its conditions are met.
- Identifiable promotional images where permission is requested: consent, including appropriate arrangements for children. Other recording or evidence uses require a separately assessed lawful basis and appropriate information.
- Protecting people and managing safeguarding concerns: the appropriate legal obligation, legitimate interest or vital-interest basis for the circumstances, together with an additional lawful condition where special-category or criminal-offence information is involved.

We do not use consent where people cannot freely choose, or claim a legal obligation without identifying the relevant duty. Necessary health or safeguarding processing requires an additional condition under data-protection law; we assess and record this and any required safeguards. We explain material new uses before starting them.

Sharing information

We do not sell personal information or give it to others for their own unrelated marketing. Necessary recipients may include our IT and email suppliers, booking and payment services, professional advisers, insurers, relevant funders or delivery partners, and statutory or safeguarding authorities. Use anonymised or aggregated reporting where possible. Share identifiable information only when necessary, fair and lawful.

We remain responsible for our own processing when using suppliers. Where a supplier processes information for us, we require appropriate contractual and security arrangements. Some services act as separate controllers for their own purposes and provide their own notices. We do not assume that all suppliers' responsibilities are the same.

If personal information is transferred outside the UK, the transfer must be covered by an applicable UK adequacy arrangement or other lawful transfer safeguards, together with any assessment required. Contact us for information about transfers and the safeguards relevant to your information. We will not claim that all data remains in the UK without verifying it.

How long we keep information

We keep information only for its purpose and relevant legal or safeguarding needs. Routine enquiries are normally removed within 12 months after closure unless they become part of a booking, complaint or other retained record. Booking, donation and financial records are normally retained for six years after the relevant financial year, subject to any longer legal or funding requirement.

Volunteer records are normally retained during involvement and for six years afterwards where needed for administration, insurance or legal claims; unnecessary sensitive information is removed sooner. Mailing-list data is kept while you remain subscribed; a minimal suppression record may be kept to respect an opt-out. Approved promotional images are reviewed for continuing relevance and permission, normally at least every three years.

Safeguarding, accident and legal-dispute records may require longer retention. Decisions take account of the person's age, the nature of the concern, statutory advice, insurance and the possibility of future proceedings. These records are access restricted and reviewed rather than deleted automatically. We can explain the criteria relevant to a particular record. Legal holds can suspend normal destruction.

Your choices and rights

Depending on the processing and lawful basis, you may ask for access, correction, erasure, restriction or portability of your information, or object to its use. Some rights are subject to legal conditions or exemptions. You can withdraw consent at any time without affecting the lawfulness of earlier processing.

You have an absolute right to object to direct marketing. Use an unsubscribe link or contact us and we will stop that marketing. Objecting to other legitimate-interest processing will be considered under the applicable rules.

You can make a request orally or in writing. We may need reasonable information to verify identity or clarify the request. We normally respond without undue delay and within one month, subject to lawful timing rules and extensions which we will explain. We do not normally charge a fee. If information is necessary for a booking or service, not providing it may prevent that arrangement;

we will explain any requirement and consequence.

Children security and digital services

We provide age-appropriate information and consider children's privacy and best interests. A parent's permission is not the only possible lawful basis for processing a child's information, particularly where protection from harm is involved. We apply appropriate permission and safeguarding arrangements to children's promotional images.

We use proportionate access controls, training and security measures and respond to incidents under our internal procedures. No system is risk free. Our website and linked external services may use cookies or similar technologies. Strictly necessary technologies do not require the same choice as optional tracking; consent or any applicable lawful exception must be assessed for the actual use. Where required, optional technologies must be controlled before they operate. Information and choices must reflect the technologies actually used. Contact us for cookie information or help with a preference. External sites provide their own notices.

Complaints and changes

Please contact us first if you have a privacy concern so we can investigate. We aim to acknowledge within five working days and will do so within the legal maximum of 30 days, keep you informed and communicate an outcome without undue delay. You may complain to the Information Commissioner's Office at ico.org.uk or telephone 0303 123 1113. This does not remove other legal rights.

We will keep this notice current and explain significant changes where appropriate. Our internal Data Protection and Retention Policy sets out responsibilities and the detailed handling arrangements.

Prepared for adoption. Record authorised approval in the master register. Review sooner after a significant change or incident.

Reference guidance
ico.org.uk - what privacy information should we provide
ico.org.uk - how to deal with data protection complaints
ico.org.uk - cookies