

Privacy Policy

Introduction

We are Harwich Haven Authority, a not for profit organisation. This privacy notice is to let you know how we promise to look after your personal data. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

Our registered head office address is at Harbour House, The Quay, Harwich, Essex, CO12 3HH.

If you have any questions or want more details about how we use your personal data, please let us know. See the how to contact us section below for all the different ways you can get in touch.

What personal data we collect about you

- Personal data that you provide to us. There are lots of ways in which you may share your
 personal data with us, for example, you may register on our website post on social media sites that
 we run or contact us in connection with services that you would like to use. The personal data that
 you provide to us for example may include your name, address, email address and phone number,
 financial and credit card information.
- Personal data that we receive from third parties. If we work with other businesses or use sub-contractors these parties may collect personal data about you which they will share with us. For example, we may have your name and contact details passed to us by a third party that refers you to us so that we can provide your with our services, receive feedback from a sub-contractor we have instructed to help us provide a service that you have requested such as a courier company.
- Personal data about your use of our website. This is technical information and includes details
 such as your IP address, your login information, browser type and version, time zone setting,
 browser plug-in types and versions, operating system and platform, as well as details of how you
 navigated to our website and where you went when you left, what pages or products you viewed or
 searched for, page response times, download errors, length of visits to certain pages, page
 interaction information (such as scrolling, clicks, and mouse-overs) and any phone number used to
 call our customer service number.

What we use your personal data for

Personal data that you provide to us is used to:

- Provide you with the information and services that you request from us.
- Provide you with marketing information in accordance with your marketing preferences.
- Manage and administer our business.
- Review and improve our service.

Personal data that we receive from third parties is combined with the personal data that you provide to us and used for the purposes described above.

Personal data about your use of our website is used:

- To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To improve our website to ensure that content is presented in the most effective manner for you and for your computer or mobile device.
- As part of our efforts to keep our site safe and secure.
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- To make suggestions and recommendations to you and other users of our site about services that may interest you or them.

Cookies

Our website uses cookies to distinguish you from other uses of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. For detailed information on the cookies we use and the purposes for which we use them see our Cookies Policy.

When we need your consent to use your personal data

Whilst we always want you to be aware of how we are using your personal data, this does not necessarily mean that we are required to ask for your consent before we can use it.

In the day to day running of our business we may use your personal data without asking for your consent because:

- We are entering into and carrying out our obligations under a contract with you.
- We need to use your personal data for our own legitimate purposes (such as the administration and management of our business and the improvement of our services) and our doing so will not interfere with your privacy rights.

In exceptional circumstances we may wish to use your personal data for a different purpose which does require your consent. In these circumstances we will contact you to explain how we wish to use your data and to ask for your consent. You are not required to give consent just because we ask for it. If you do give consent you can change your mind and withdraw it at a later date.

Personal data you are legally obliged to provide

You are not under a legal obligation to provide us with any of your personal data but please note that if you elect not to provide us with your personal data we may be unable to provide our services to you.

Your rights to know what personal data we hold and to control how we use it

You have a legal right to know what personal data we hold about you - this is called the right of subject access. You can exercise this right by sending us a written request at any time. Please mark your letter "Subject Access Request" and send it to our Data Compliance Officer (see 'how to contact us' section below for contact details). We may ask you to pay a £10 fee before we respond to your request.

You also have rights to:

- Prevent your personal data being used for marketing purposes.
- Have inaccurate personal data corrected, blocked or erased.

- Object to decisions being made about you by automated means or to your personal data being used for profiling purposes.
- Object to our using your personal data in ways that are likely to cause you damage or distress.
- Restrict our use of your personal data.
- Require that we delete your personal data.
- Require that we provide you, or anyone that you nominate, with a copy of any personal data you
 have given us in a structured electronic form such as a CSV file.

You can find full details of your personal data rights on the Information Commissioner's Office website at www.ico.org.uk.

Automated decision making and profiling

We do not currently make use of automated decision making or profiling.

We use profiling to on some recruitment campaigns.

You are entitled to ask that we do not make automated decisions about you or use your personal data for profiling purposes.

Please refer to the section on Your rights to know what personal data we hold and to control how we use it above for details on how to exercise your rights.

When we will share your personal data with others

We share your data with the following people in the day to day running of our business.

Any business partners, suppliers and sub-contractors we work with to provide you with services that you request from us.

We may also share your personal information with third parties on a one-off basis, for example, if we sell or buy any business or assets (including our own), in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.

We are under a duty to disclose or share your personal data in order to comply with any legal obligation or other agreements; or to protect the rights, property, or safety of our customers, ourselves or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

How we keep your personal data safe

We take every care to ensure that your personal data is kept secure.

The security measures we take include:

- Only storing your personal data on our secure servers.
- Ensuring that our staff receive regular data security awareness training.
- Keeping paper records to a minimum and ensuring that those we do have are stored in locked filing cabinets on our office premises.
- Maintaining up to date firewalls and anti-virus software to minimise the risk of unauthorised access to our systems.
- Enforcing a policy on the use of mobile devices and out of office working is secured by two factor authentication.
- Other security measures.

Please remember that **you are responsible for keeping your passwords secure**. If we have given you (or you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. **Please do not to share your passwords with anyone.**

Unfortunately, sending information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of personal data sent to our website; you send us personal data at your own risk. Once we have received your personal data, we will use strict procedures and security features (some of which are described above) to try to prevent unauthorised access.

How we use your personal data for marketing

We will add your details to our marketing database if:

- You make an enquiry about our services.
- You have told a third party that you would like them to pass us your contact details so that we can send you updates about our services.
- You have registered an account on our website and have indicated during the sign up process that you are happy to receive marketing communications.

We may send you marketing communications by email, telephone, post or other.

You can ask us to only send you marketing communications by particular methods (for example, you may be happy to receive emails from us but not telephone calls), about specific subjects for example new tide tables or you may ask us not to send you any marketing communications at all.

We may ask you to indicate your marketing preferences when you first register an account on our website. You can check and update your current marketing preferences at any time by calling or emailing us (see the how to contact us section below for contact details).

We never share your personal data with third parties for marketing purposes. We will only share your personal data with third parties for marketing purposes if you provide us with your consent to do so by ticking a box on a form we use to collect your personal data.

When we will send your personal data to other countries

Your personal data may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") by us or by our sub-contractors. We use a mailing system called Mailchimp, who are based in the United States. Where we, or our sub-contractors, use IT systems or software that is provided by non-UK companies, your personal data may be stored on the servers of these non-UK companies outside the EEA. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Mailchimp store your personal data on a CRM system provided by a US supplier who has servers located in the US. We only ever collect names and email addresses. We have verified that the US supplier is registered under the Privacy Shield.

How long we keep your personal data

We only keep your personal data for as long as we actually need it. In practice this means that we will keep:

- Your name and contact details for 7 years.
- A record of the services including a copy of your full customer file we provide to you for 6 years.

Please note that we may anonymise your personal data or use it for statistical purposes. We keep anonymised and statistical data indefinitely but we take care to ensure that such data can no longer identify or be connected to any individual.

How you can make a complaint

If you are unhappy with the way we have used your personal data please contact our DCO (see the how to contact us section below for contact details.

You are also entitled to make a complaint to the Information Commissioner's Office which you can do by visiting www.ico.org.uk. Whilst you are not required to do so, we encourage you to contact us directly to discuss any concerns that you may have and to allow us an opportunity to address these before you contact the Information Commissioner's Office.

How we keep this policy up to date

We will review and update this policy from time to time. This may be to reflect a change in the goods or services we offer or to our internal procedures or it may be to reflect a change in the law.

The easiest way to check for updates is by looking for the latest version of this policy on our website; www.hha.co.uk or you can contact us (see the how to contact us below) to ask us to send you the latest version of our policy.

Each time we update our policy we will update the policy version number shown in the footer of the policy and the date on which that version of the policy came into force.

How to contact us

We have appointed a Data Compliance Officer (DCO) who oversees our handling of personal data.

If you have any questions or want more details about how we use your personal data, please contact our DCO.

Email: dco@hha.co.uk

Telephone: 01255 253030

Address: Harbour House, The Quay, Harwich, Essex, CO12 3HH

Please mark your correspondence for the attention of the Data Compliance Officer.

Version one: updated on Friday 25 May 2018