

# Heritage Quay Privacy Notice

## General Information

Heritage Quay, the University's information & records management and archive services, is part of the University of Huddersfield and all our data processing is managed in accordance with the University [Data Protection Policy](#). This Privacy Notice sets out when and how we collect, use, manage and store data. It also contains details of the University's Data Protection Officer, how you can exercise your rights as a data subject and details of our retention schedule.

## Updating our Privacy Notice

We keep this notice under regular review to ensure it is up to date and accurate. It was last updated in January 2023.

## Heritage Quay's Use of Data

### Purpose for Processing

Our purpose is to make the archival collections held by the University available to the widest possible audience whether visiting Heritage Quay in person or using remote enquiry services or our website. The collections have been selected for permanent preservation for archiving purposes in the public interest, in line with our [Collections Management Policy](#). The [scope of our archive collections](#) is summarised on our website.

This privacy notice tells you what to expect when we collect personal information. This can be anything that identifies a living individual. It applies to information we collect about people who engage with us through our website, our premises, and/or our services and activities, as well as living individuals included in the collections.

### People in our archival collections

The University holds archives that have been selected for permanent preservation for archiving purposes in the public interest, as detailed in our public catalogue, and makes them available for use. These are documents (including files, maps, pictures, posters, films and sound recordings in analogue and digital form) that have been produced by individuals and organisations dating back several centuries. Heritage Quay provides advice and guidance to donors and depositors as well as to the University (in the case of our corporate records) as to whether these documents are worthy of archival preservation – that is, whether they have lasting value for the research and understanding of history and the present, or for the protection of legitimate interests.

We guarantee access to this archival material while observing the protection of private or public interests. In principle, every person has the right to access the documents in Heritage Quay upon request. We provide information about the archive material through our online catalogue [www.heritagequay.org/archives](http://www.heritagequay.org/archives)

Many of the archive collections may include personal data which is retained and (where appropriate) made available for research, in line with the safeguards for archiving in the public interest set out within s.19 of the Data Protection Act 2018. Heritage Quay follows the detailed guidance about data protection legislation as applied to archives in the UK co-produced by The National Archives and the wider archive sector available at <http://www.nationalarchives.gov.uk/archives-sector/legislation/archives-data-protection-law-uk/>

We may use automated profiling to calculate when personal information in archives that is closed for a person's lifetime can be made open. To do this we assume a lifespan of 100 years. This may result in information on people who are aged over 100 being made public. If this is the case, please contact us and we will remove your information from public access.

People who use information about living people from the archives have a duty, under data protection legislation, not to use that information in a way which may cause distress or damage to them. Just because information is in the

public domain, it does not necessarily make it lawful for a user to make it public. Personal information is not covered by the Open Government or Creative Commons Licences and may also be subject to copyright.

### Legal Basis for processing personal information

The legal basis we rely on for processing personal data is Article 6(1)(e) of the General Data Protection Regulations (GDPR), which allows us to process personal data as necessary for the performance of a task in the public interest; our statement of public task is contained in section 6.2 of our [Collections Management Policy](#). Article 89 of the GDPR and section 19 and schedule 2 part 6 of the Data Protection Act 2018, amongst other provisions, set out the special rules for archiving purposes in the public interest.

We also process some data under article 6(1)(f) of the GDPR, which allows us to process data where necessary in our legitimate interests, under article 6(1)(a) where data processing is necessary to perform a contract and under article 6(1)(c), where we are under a legal obligation to do so.

We may also use your contact details to send you information on our products and services. We will only do so where we have received your explicit consent under Article 6(1)(a) of GDPR and you may opt-out at any time.

### Example circumstances under which we might process personal information

Processing personal information is required in order to:	Examples of personal information that is necessary for this purpose:	The University's lawful basis for using personal information
<p>give you access to original archival documents in our research room or via online appointments and to safeguard the integrity of our collection</p> <p>See the <a href="#">Regulations Governing The Use Of The University Library And Archives Services</a></p>	<ul style="list-style-type: none"> <li>• your contact details</li> <li>• a record of the documents you have ordered</li> </ul>	<p>This is necessary to perform our <b>legitimate interest</b> with you to provide you with access to collections. Any <b>research</b> undertaken will be done in accordance with safeguards in data protection legislation.</p> <p>Article 6(1)(e) of GDPR Article 6(1)(f) of GDPR</p>
<p>carry out archiving purposes in the public interest, including accessioning material into the collections, undertaking collections management activities such as cataloguing, and maintaining the collections</p>	<p>Potentially covers all types of personal data.</p>	<p>The GDPR permits “the processing of personal data (including sensitive personal data) without consent, where necessary for archiving purposes in the public interest”, subject to appropriate safeguards. For more information see the <a href="#">Best Practice Guide to Archiving Personal Data</a></p>
<p>send you marketing information we think you might find useful or which you have requested from us – including our regular email updates, and information about events and products – and to occasionally inform you of new services we will be providing or we consider will be of interest to you</p>	<ul style="list-style-type: none"> <li>• your contact details</li> <li>• your marketing preferences</li> </ul>	<p><b>Consent</b> freely given by you when opting in to receive our regular email updates or other communications from us. You may withdraw your consent at any time by clicking on ‘unsubscribe’ in the emails that we send, or by contacting us directly at <a href="mailto:archives@hud.ac.uk">archives@hud.ac.uk</a>.</p> <p>Article 6(1)(a) of GDPR</p>
<p>conduct research and data analysis and develop statistics to better understand the use made of our facilities and our archival collection,</p>	<ul style="list-style-type: none"> <li>• records of your attendance at any events hosted by us, singly or jointly with another organisation</li> </ul>	<p>This is necessary to perform our <b>legitimate interest</b> with you to ensure that our audience is targeted and relevant. Any <b>research</b> undertaken will be done in</p>

including event attendance and trends		accordance with safeguards in data protection legislation. Article 6(1)(f) of GDPR
promote Heritage Quay, our courses and events, and for inclusion in educational/training material	<ul style="list-style-type: none"> <li>images in video and/or photographic form</li> </ul>	Where you have given us your explicit <b>consent</b> to do so. Article 6(1)(a) of GDPR
administer your attendance at any workshops, programmes or events run by the University which you sign up to	<ul style="list-style-type: none"> <li>contact details</li> <li>transaction and payment information (the University does not store your credit card details)</li> </ul>	This is necessary under your <b>contract</b> with us to enable us to register you and properly manage and administer your attendance. If you are attending Heritage Quay via a separate organisation, you may have a contract with them. Article 6(1)(b) of GDPR
arrange and manage any contracts for the provision of any services or products: for example, paying for reprographics or research services	<ul style="list-style-type: none"> <li>contact details</li> <li>transaction and payment information</li> <li>records of your interactions with us</li> </ul>	This is necessary to enable us to properly administer and perform any <b>contract</b> for the provision of any services and products you have purchased from us. Article 6(1)(b) of GDPR
manage the security of our building and facilities, including the use of CCTV governed by the University's <a href="#">CCTV code of practice</a>	<ul style="list-style-type: none"> <li>CCTV footage and any other records of your presence and conduct on our premises</li> </ul>	This is necessary to perform our <b>legitimate interest</b> Article 6(1)(f) of GDPR
manage your interactions with our website or our public wi-fi  See the University's <a href="#">Computing Regulations</a>	<ul style="list-style-type: none"> <li>email address</li> <li>username</li> </ul>	This is necessary to perform our <b>legitimate interest</b> Article 6(1)(f) of GDPR
comply with health and safety requirements  See the University's <a href="#">Health and Safety policy</a>	<ul style="list-style-type: none"> <li>records of attendance</li> <li>CCTV footage</li> <li>other information obtained through electronic means such as information you supply about your dietary or accessibility requirements</li> </ul>	We have a <b>legal obligation</b> to provide you and everyone who visits or works at our premises with a safe and accessible environment. Article 6(1)(c) of GDPR
use information about your physical or mental health (including any injuries) or disability status to ensure your health and safety when partaking in any of our events or activities	<ul style="list-style-type: none"> <li>health and medical information, provided by you when signing up for events and activities</li> </ul>	You have <b>consented</b> to provide us with this information, for your health and safety. Article 6(1)(a) of GDPR
answer your queries or complaints	<ul style="list-style-type: none"> <li>contact details</li> <li>records of your interactions with us</li> </ul>	We have a <b>legitimate interest</b> to provide complaint handling services to you, and <b>legal obligation/official authority</b> to process your requests under the Data Protection and Freedom of Information Acts. Article 6(1)(b) of GDPR Article 6(1)(e) of GDPR Article 6(1)(f) of GDPR

## Sharing your personal data with other people

We do not use any data processors (third parties who provide part of our services for us) other than those listed below.

The [Cookie Policy](#) on our website explains how we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site.

We do not use any other data processors outside the EU. If you are accessing our services from outside the EU then any information you send or receive from us will, of necessity, be transferred via a non-EU country.

- **Sendinblue** act as a data processor for us to send our email marketing newsletter to those who have opted-in. The University remains the data controller for the email addresses (no other personal information) held by Sendinblue within the EU; further information is available at <https://www.sendinblue.com/legal/termsofuse/>
- the University uses **First Parking LLP** to manage its car parking (including spaces for Blue Badge Holders); further information is available at <https://www.paymyparking.net/>
- **Heritage Quay** uses Microsoft 365 applications including Bookings, Outlook and Teams to manage appointments; further information is available at <https://privacy.microsoft.com/en-gb/privacystatement>

Other third parties will not have access to your personal information unless the law allows them to do so.

## How long do we keep your personal data?

For information about how long we hold personal data, see our [retention policy](#).

We keep your personal information for no longer than is necessary to fulfil the purposes for which it was collected, as described above or in another privacy notice provided to you, taking into account the requirements from the following criteria:

- any laws or regulations that we are required to follow
- whether we are in a legal or other type of dispute with each other or any third party
- the type of information that we hold about you
- whether you are still signed up to our services
- retention in case of queries: we will retain it for a reasonable period in case of further queries from you
- retention in case of claims: we will retain it for the period in which you might legally bring claims against us (in the UK this means we will retain it for six years)

If you unsubscribe from our newsletter, we will keep a record of the fact that you have unsubscribed.

If you would like further information about our information retention practices, please contact us.

## Keeping personal information secure

The University takes the technical and organisational security of all the information it holds very seriously. All our staff receive training in how to handle personal data when they join us and have to take refresher courses. We protect your information using varying levels of encryption. We also make sure that any third parties with which we deal have an obligation to keep all personal information they process on our behalf secure.

## What are your rights?

For more information on your rights and how to exercise them, please see our [Your Rights](#) page.

## Where to find out more

### Contact us

We welcome comments or queries about this privacy notice and our information handling practices. If you wish to provide comments, update any of your preferences or exercise any of your rights you can contact us. We will respond to you within ten days of receiving your enquiry.

[archives@hud.ac.uk](mailto:archives@hud.ac.uk)

+44 (0) 1484 473 168

Postal address: Heritage Quay, University of Huddersfield, Queensgate, Huddersfield HD1 3DH, UK

View our [complaints procedure](#).

### The University's Data Protection arrangements

Heritage Quay, the University's information & records management and archive services, is part of the University of Huddersfield and all our data processing is managed in accordance with the [University Data Protection Policy](#) to which this document is supplemental. More information about data protection, including how to exercise your rights, is available at <https://www.hud.ac.uk/informationgovernance/dataprotection/>

### Independent advice

For independent advice about data protection, privacy and data-sharing issues you can contact the Information Commissioner: <https://ico.org.uk/>