



TRINITY HOUSE

# The Corporation of Trinity House

## Privacy Notice

---

Our privacy notice contains the standards you can expect when we ask for, or hold, your personal information. It also covers what we ask of you, to help us keep information up to date.

This is the Privacy Notice of the Corporation of Trinity House of Deptford Strond and its subsidiaries Trinity House Events Limited and Trinitas Services Limited (“Trinity House” or “TH”). In this document, “we”, “our”, or “us” refer to TH.

Trinity House is a charity dedicated to safeguarding shipping and seafarers, providing education, support and welfare to the seafaring community with a statutory duty as a General Lighthouse Authority to deliver a reliable, efficient and cost-effective aids to navigation service for the benefit and safety of all mariners. As the General Lighthouse Authority for England, Wales, the Channel Islands and Gibraltar Trinity House’s functions and powers are principally derived from the Merchant Shipping Act 1995 (as amended). The role of Trinity House as a General Lighthouse Authority under the Act includes the superintendence and management of all lighthouses, buoys and beacons within our area of jurisdiction.

Head office for **The Corporation of Trinity House of Deptford Strond**: Trinity House, Tower Hill, London, EC3N 4DH

Our Royal Charter Number is RC000622

Our Registered Charity Number is 211869

Head office for **Trinity House Events Limited**: Trinity House, Tower Hill, London, EC3N 4DH

Company Number No.: 07506615

Head office for **Trinitas Services Limited**: Trinity House Depot, The Quay, Harwich, Essex CO12 3JW

Company Number No.: 02801613

This privacy notice explains how TH will comply with data protection law. This includes the General Data Protection Regulation (GDPR), and other provisions contained within the Data Protection Act 2018.

### What is personal data?

Personal data is any information relating to an identified or identifiable natural living person, otherwise known as a ‘data subject’. A data subject is someone who can be recognised, directly or

indirectly, by information such as a name, an identification number, location data, an online identifier, or data relating to their physical, physiological, genetic, mental, economic, cultural, or social identity. These types of identifying information are known as 'personal data'. Data protection law applies to the processing of personal data, including its collection, use and storage.

## **Your privacy**

We know how important it is to protect your privacy and comply with data protection law. If we need to collect, store or otherwise use your personal information, we will:

- have a legal basis for doing so, and only ask for what we need
- do so in a fair and transparent way, letting you know why we need your information and how we will use it
- use it in the way we said we would and not in a way you wouldn't expect without letting you know
- ensure that we don't keep more than we need, for longer than we need
- make sure it is accurate and up-to-date
- make sure nobody has access to it who shouldn't
- ensure that it is kept safe and secure

We will also keep detailed records of how such data is handled. You can help us by making sure that the information you give us is accurate and let us know if it changes. For example, if you change telephone numbers, name or move to a new home, let us know.

## **What allows TH to process your personal data**

To process personal data, we need to meet one of the following conditions (or legal bases):

- you have freely given your consent – it will be clear to you what you are consenting to and how you can withdraw your consent
- it is necessary for a contract you have entered into with us, or a contract that you intend to enter into
- it is necessary to meet a legal obligation
- it is necessary to protect someone's 'vital interests' (a matter of life or death)
- it is necessary to perform a public task (in our case, to carry out our public function as a General Lighthouse Authority as set out in the Merchant Shipping Act 1995 (as amended) or to exercise powers set out in law
- it is necessary for our legitimate interests or that of a third party (a condition used where personal data is going to be used in ways that are reasonably expected and are not intrusive, or where there are compelling reasons for the processing)

There are further requirements for processing more sensitive, or 'special category', personal data.

The lawful basis that we rely on to process your personal data will determine which of the following rights are available to you. Much of the processing we do will be necessary to meet our legal

obligations or to perform a public task. If we hold personal data about you for different purposes, then the legal basis we rely on in each case may be different.

## **Your rights**

The GDPR sets out a number of rights which individuals have over their personal data, allowing you to request copies of your personal data or, in certain circumstances, to have it deleted or modified. These rights are explained fully on the Information Commissioner's Office website. TH will ensure that we uphold your rights to the extent that they apply to the way in which we process your personal data. Below we have explained those rights that are most likely to be relevant to the ways in which TH processes personal data.

### **The right to be informed**

The right to be informed is a key part of the transparency requirements of data protection law. It includes various categories of information which would normally be provided in a 'privacy information notice'. Where you give us your data directly, you will see a privacy notice from us which will tell you, or provide you with a link to information on:

- which part of TH as data controller is processing your personal information, and how to contact our Data Protection Officer
- the purpose and legal basis for processing (including details of the legitimate interests where that is the basis)
- where relevant, the categories of recipients with whom the data has been or will be shared, including information about transfers to a third country and the protective safeguards in place where that happens
- how long it will be kept for or the criteria used to determine the retention period
- the rights to which you are entitled and the right to withdraw consent where that is the legal basis for processing
- how to complain
- whether providing personal data is a contractual or statutory requirement, and if so the possible consequences of not providing it
- whether automated decisions which might significantly affect you will take place, and if so information about the logic involved and how it might affect you

Where your personal data was sent to us by a third party, we will aim to provide you with the above information, where relevant, within one month. We will also aim to inform you of the source that the personal data originated from and the types of your personal data that will be used by us. If we intend to share your data onward with another organisation, we will let you know before we do so. See also 'When we share information'.

### **The right of access**

You can request copies of the personal data that we hold about you at any time by making what is known as a 'subject access request'. Before we can act on your request, you will need to supply proof

of your identity. Please be as specific as you can about the information you want and, if it isn't obvious, explain why you expect us to hold your personal data.

We will usually respond to subject access requests within one month of receipt, but may take up to 2 months in the case of complex and/or numerous requests. We will let you know when you can expect to receive a response, or if we will be unable to provide you with one.

There is no fee for making a subject access request, but charges may be made where someone asks for further copies of information which they have already received, or in exceptional circumstances, such as where a request is clearly unfounded, excessive or repetitive. In such cases, we may also refuse to answer the request. We will advise you of your right to complain to the Information Commissioner or to seek a judicial remedy.

If you would like to make a subject access request, please address it to [enquiries@thls.org](mailto:enquiries@thls.org) or [data.protection@trinityhouse.co.uk](mailto:data.protection@trinityhouse.co.uk).

### **Right to object**

You have the right to object to us processing your personal data in any of the following circumstances:

- where the processing is based on either the legitimate interests or public task condition
- direct marketing (including profiling)
- for scientific and/or historical research and statistics purposes

Where you object to us processing your personal data based on the legitimate interests or public task condition or scientific and / or historical research and statistical purposes, we will stop processing that information unless we can demonstrate that there are overriding reasons to do so, including where processing is necessary for the conduct of legal claims.

### **Other rights**

Other rights you may have are: a right to rectification if your personal data is inaccurate, a right to erasure, a right to restrict processing, a right to data portability, and rights in relation to automated decision making.

Whilst these rights are unlikely to apply to the kind of processing that TH routinely carries out, if you think they may apply and want to know more, please refer to the [Information Commissioner's Office website](#). Any request you make to us to exercise these rights will receive appropriate consideration, within the timescales required by data protection law.

### **Children**

Children have the same rights as adults over their personal data which they can exercise as long as they are competent to do so. Where a child is not considered to be competent, an adult with parental responsibility may usually exercise the child's data protection rights on their behalf.

If we need to process personal data belonging to children we will provide children with the same information as we would give to adults in a clear, friendly and accessible way appropriate to the age group. If the child is pre-literate the information will be provided in a way in which it will be readily understandable by the child's parent/guardian/carer.

## **Our privacy information notice**

We use personal information for a wide range of purposes, to enable us to carry out our functions as a General Lighthouse Authority. These include:

- maintaining our accounts and records
- consideration and investigation of complaints
- answering queries
- undertaking research
- the provision of education or training
- property management
- corporate administration
- the support and management of our staff
- licensing, enforcement and regulatory duties
- superintendence and management of aids to navigation

We also use personal information for to enable us to carry out our charitable objectives and our role as a deep sea pilotage licensing authority.

## **When we share information**

We may share personal data within our organisation or with other bodies where we are permitted to do so by law. In all cases, whether data is shared internally or externally, we will be governed by data protection law.

## **Correspondence**

When you write to us in our capacity as a General Lighthouse Authority, we will look after any personal information you disclose to us and use it only as necessary to provide you with an answer. This will be in accordance with our task as a statutory undertaker to be accountable and transparent about the functions and policies that we are responsible for.

Where your correspondence relates to an area or issue for which another body has responsibility, it will in most cases be passed to them to respond to you. This includes transferring correspondence to the other General Lighthouse Authorities of the UK and Ireland (namely the Northern Lighthouse Board and the Commissioners for Irish Lights) if the matter relates specifically to their respective areas of responsibility. In some circumstances we may share information with the UK Department for Transport, Transport Scotland, or the (Irish) Department for Transport, Tourism and Sport. We will let you know when this happens. Except as explained here, your correspondence will not be shared outside of these bodies without your consent.

In the case of requests for information that are handled under the Freedom of Information Act 2000 or Environmental Information Regulations 2004, TH will use your personal data as necessary to comply with those laws to the extent to which they apply to TH. We are not subject to the Freedom of Information Act 2000 but have elected to act within the spirit of the Act. We may need to consult with the bodies mentioned in the paragraph above where a coordinated response is

required. Where an information request would be more appropriately directed to another organisation, our response will advise you where it should be sent, but the request will not be forwarded. When, in some circumstances, it is necessary to share information requests with third parties other than as mentioned in the paragraph above for consultation, any information that identifies you will not be shared.

A record of your correspondence will be held by us for at least 3 years and then, under normal circumstances, deleted. It will only be kept for longer where it is necessary to keep it for longer.

### **Distribution lists**

TH maintains a number of distribution lists to communicate with its stakeholders and interested parties. In many cases this is to enable us to function efficiently as a General Lighthouse Authority. In some cases, where the use of a distribution list does not relate to the performance of our public task, we may use it as necessary for our legitimate interests. In such cases, we have had regard to the rights and freedoms of those whose names are included on the list. Each list will be used only for the purpose that the individuals on the list were informed about at the time their information was collected by us.

### **Our Data Protection Officer**

TH is a data controller under data protection law. Our Data Protection Officer and his team inform and advise TH in how to comply with data protection law. They monitor and promote compliance, for example by providing advice on Data Protection Impact Assessments, and arranging audits and staff training. They act as your first point of contact, and lead on any communications with the Information Commissioner's Office.

You can contact the Data Protection Officer by writing to the following address:

Data Protection Officer

Trinity House

Tower Hill

London

EC3N 4DH

Email: [data.protection@trinityhouse.co.uk](mailto:data.protection@trinityhouse.co.uk)

### **Privacy by design**

Where we introduce new technologies, policies or processes, we will ensure that your privacy is considered from the outset, and where beneficial will carry out a Data Protection Impact Assessment (DPIA).

We will always carry out a DPIA where we use new technologies or consider there is a high risk to your rights and freedoms. Where an assessment identifies risks that cannot be satisfactorily reduced or avoided, our Data Protection Officer or their team will seek advice from the Information Commissioner to help us find the best solution.

### **The steps we take to keep your data secure**

We take information security seriously and will protect your personal data from unauthorised access, accidental loss, destruction and damage. We carry out regular reviews and audits to ensure that our methods of collecting, holding and processing personal data meet the appropriate standards and industry good practice. We will only transfer your personal data overseas where appropriate safeguards are in place to protect it.

### **The training and guidance we give to our staff**

All of our staff are trained in the importance of protecting personal and other sensitive information. Those who routinely access personal data as part of their jobs are expected to undertake more in depth training.

Managers who have formal responsibilities for large datasets, for example as information asset owners, will also receive additional training so that they have a clear understanding of what they need to do to keep the data under their control safe and secure.

### **Data breach notification**

TH does everything it can to keep your personal data secure. But if, despite this, a breach occurs which creates a risk to your rights and freedoms (for example, financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), we will ensure that the Information Commissioner's Office is informed without delay, and in any event within 72 hours after we have become aware of it.

Where we assess that there is a high risk to you, we will ensure that you are notified without undue delay. Where it is not possible to contact you directly, we will attempt to make you aware through other means, such as a public announcement. The information we will provide to you will include:

- the contact details of our Data Protection Officer
- the likely consequences of the breach
- details of the measures already taken or planned to address the breach including any steps taken to mitigate potential damaging effects

### **Job application and employment**

If you send us information in connection with a job application, we may keep it for up to one year in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years following the year in which your employment terminates before destroying or deleting it. With the exception of any information we are bound to keep for monitoring, legislative, legal or regulatory purposes?

### **Sending a message to our support team**

When you contact us either by telephone, through our website by e-mail or via social media, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to meet the legal obligations of TH

We keep personally identifiable information associated with your message, such as your name and email address so we can track our communications with you to provide a high quality service.

### **Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

### **Verification of your information**

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

### **Encryption of data sent between us**

We may use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us for certain parts of our website.

Whenever information is transferred between us, you can check whether it is done by using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

### **How to make a complaint**

If you're unhappy with the way we have handled your personal data and want to make a complaint, please write to our Data Protection Officer using the details below.

We aim to respond to written and email complaints within one month wherever possible. If it is not possible to give you a full reply within this time (for example, if your complaint requires more detailed investigation), we will tell you what is being done and when you can expect a full response.

### **Data protection contacts**

Data Protection Officer

Trinity House

Tower Hill

London

EC3N 4DH

Email: [data.protection@trinityhouse.co.uk](mailto:data.protection@trinityhouse.co.uk)



If you remain dissatisfied, or if you require independent advice about data protection, privacy and data sharing issues, contact:

Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

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