



Privacy and GDPR Policy

1) Introduction

At Watershed Workshops, we are committed to protecting your privacy and complying with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable data protection laws. This privacy policy explains how we collect, use, process, store, and share your personal data. Where we rely on consent, we will make this clear and provide appropriate information so that consent can be freely given and withdrawn.

2) Personal Data We Collect

We may collect the following personal data:

- Contact information: Name, email address, phone number
- Demographic information: Age, gender, location
- Account information: Username, password, where applicable
- Payment information: Credit card details, billing address, where applicable
- Special categories of data: Racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data on health, sex life, or sexual orientation, genetic or biometric data, where relevant and lawfully processed
- Anonymous data: Data that has been anonymised cannot be traced back to an individual. Fully anonymous data is not personal data for the purposes of UK GDPR and may be used for research purposes.

3) Legal Basis for Processing

We process your personal data based on:

- Consent: When you provide explicit consent
- Contractual necessity: To fulfil a contract or request (e.g., providing a service, quote)
- Legitimate interests: When we have a legitimate interest (e.g., contacting existing customers or students), provided those interests are not overridden by your rights and interests
- Legal obligations: When required to comply with legal requirements

4) Purposes of Data Processing

We process personal data to:

- Provide our services and fulfil requests
- Communicate with you and send updates or notifications

- Personalise and improve our services
- Conduct research and analysis
- Comply with legal obligations

5) Data Sharing and Transfers

We may share your data with:

- Third-party service providers assisting us in delivering services
- Business partners for collaborative purposes where appropriate and lawful
- Law enforcement or regulatory authorities, as required by law

Where a supplier or third-party service provider processes personal data on behalf of Watershed Workshops, we will take appropriate steps to ensure that the supplier provides sufficient guarantees regarding the security and confidentiality of personal data. Where required, appropriate data processing terms or a data processing agreement will be included in the contract or service arrangement. Suppliers will be expected to use personal data only for agreed purposes, keep it secure, restrict access appropriately, and notify Watershed Workshops of any relevant data breach or security incident.

Where a supplier no longer provides a service involving Watershed Workshops data, appropriate arrangements will be made for the return, secure deletion or destruction of personal data, subject to any legal or contractual requirement to retain it.

6) Data Security Measures

We take appropriate technical and organisational measures to protect your data from unauthorised access, loss, or disclosure. This includes secure storage of physical and digital records, access controls, and regular security assessments.

We will also consider appropriate security measures when selecting suppliers and systems that process Watershed Workshops data. Access to personal data will be limited to those who need it for legitimate organisational purposes.

7) Data Retention

- Employment records: up to six years after leaving
- Recruitment applications: up to six months after the recruitment deadline, except for appointed candidates
- Personal data will otherwise only be stored as long as necessary for its purpose
- Anonymous data may be retained securely for research purposes

8) Your Rights

You have the right to:

- Access your personal data
- Rectify or erase inaccurate or outdated data
- Restrict or object to certain processing
- Withdraw consent at any time

For requests regarding your data, please contact us using the details below.

9) Lawful, Fairness and Transparency

We ensure that all data is collected and processed legally, fairly, and transparently. You have the right to know what data is collected and to request corrections or deletions.

10) Purpose Limitation and Data Minimisation

We only collect personal data for specific legitimate purposes and avoid unnecessary or excessive data collection. Data is not shared with third parties without an appropriate lawful basis, except where legally required.

11) Integrity and Confidentiality

We store personal data securely and take reasonable measures to prevent accidental loss, misuse, or destruction. All sensitive information is kept confidential.

12) Special Categories of Data

Special categories of personal data (e.g., health, ethnic origin, political opinions) require an appropriate lawful basis and additional conditions where required under UK GDPR. Such data may also be anonymised for research purposes.

13) Data Breaches

In the event of a suspected or actual personal data breach, Watershed Workshops will assess the incident promptly, take appropriate steps to contain and mitigate the risk, and keep a record of the breach and actions taken.

Where Watershed Workshops is working within an arrangement under which Kirklees Council provides data protection support or acts as the relevant Data Protection Officer, the incident will be reported to the Kirklees Data Protection Officer at dpo@kirklees.gov.uk in accordance with those arrangements. This provides a route for specialist data protection support and advice where Kirklees is involved in the organisation's data protection arrangements.

Where the law requires notification to the Information Commissioner's Office (ICO), Watershed Workshops will make the required notification within the applicable timeframe. Individuals affected by a breach will also be informed where required by law. Where a breach involves a third-party supplier processing data on behalf of Watershed Workshops, the supplier must notify Watershed Workshops promptly so that the organisation can meet its legal and contractual responsibilities.

14) Website, Cookies and Analytics

When you visit the Watershed Workshops website, we may use cookies and similar technologies to ensure that the website works effectively, improve the user experience and, where applicable, understand how visitors use the website.

Essential cookies may be used where they are necessary for the operation or security of the website. Where non-essential analytics or similar cookies are used, these will only be placed or activated in accordance with applicable privacy and cookie requirements, including obtaining consent where required.

In future, Watershed Workshops may use Google Analytics or another analytics service to understand website usage, such as visitor numbers, pages viewed and general patterns of website use. If Google Analytics or another non-essential analytics service is introduced, the website privacy/cookie information will be updated to explain what data is collected, why it is collected, how long it is retained and how users can manage or withdraw consent.

The website will provide an appropriate cookie consent mechanism and an accessible option to refuse or withdraw consent for non-essential cookies. Users will not be required to consent to non-essential analytics cookies in order to access the website.

15) Updates to This Privacy Policy

This policy may be updated periodically. The most recent version will be made available on our website. Significant changes will be communicated directly to affected individuals where appropriate.

16) Insurance and Third-Party Data Security

Watershed Workshops will review its insurance arrangements relating to the risks associated with the loss, theft, accidental disclosure or other compromise of personal data and will seek appropriate advice where necessary. This policy does not itself confirm that a specific cyber, data-loss or data-breach insurance policy is in place.

Where third-party suppliers handle personal data collected by Watershed Workshops, the organisation will use appropriate contractual terms to require the supplier to keep the data secure, use it only for agreed purposes, notify Watershed Workshops of relevant data breaches or security incidents, and securely return or delete the data when the service ends where appropriate. Evidence of deletion may be requested where this is proportionate and appropriate.

17) Contact Us

For questions, concerns, or requests regarding your personal data, contact us at:

Email: info@thewatershed.org.uk

By using our services, you acknowledge that you have read and understood this privacy policy. Where consent is required, consent will be obtained separately and may be withdrawn at any time.

Watershed Workshops Policies and Practice

Updated and agreed: October 2026 (to be reviewed annually)

Signed: Sally Scott (Chair) Date: 9th October 2026

On behalf of the Trustees at Watershed Workshops

Version 2: October 2026

Version 1: October 2025