

JOINT WASTE SOLUTIONS: PRIVACY NOTICE

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Privacy Notice

Joint Waste Solutions Limited ('JWS' 'us') respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how JWS collects and processes your personal data through your use of this website, including any data you may provide through this website when you purchase a product or service.

The main purpose of us processing personal data is to facilitate the provision of waste collection and recycling services on behalf of the Authorities (defined below). We do this by collecting and processing personal information about you in accordance with the General Data Protection Regulation ((EU) 2016/679) (the 'GDPR') and the Data Protection Act 2018.

This website is not intended for children and we do not knowingly collect data relating to children.

Who we are

JWS processes data on behalf of the following councils: Surrey Heath Borough Council, Elmbridge Borough Council, Woking Borough Council and Mole Valley District Council ('the Authorities'). These four councils have collaborated to form JWS for the purposes of managing waste services. This includes managing a joint waste collection contract with Amey LG Limited who carries out the waste and recycling services ('Amey'). Surrey Heath Borough Council acts as the host authority for JWS.

Each of the Authorities, who are the data controllers in respect of this privacy notice (each for their respective Council areas), appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice,

including any requests to exercise your legal rights, please contact the DPO for the relevant Council area using the details set out below.

Contact details

Our full details are:

Full name of legal entity: Surrey Heath Borough Council

Name or title of DPO: Mrs Karen Limmer, Head of Legal Services

Email address: data.protection@surreyheath.gov.uk

Postal address: Surrey Heath House, Knoll Road, Camberley, Surrey, GU15 3HD

Telephone number: 01276 707100

Contact details

Our full details are:

Full name of legal entity: Elmbridge Borough Council

Name or title of DPO: Head of Legal Services

Email address: dataprotection@elmbridge.gov.uk

Postal address: Civic Centre, High Street, Esher, Surrey KT10 9SD

Telephone number: 01372 474474

Contact details

Our full details are:

Full name of legal entity: Woking Borough Council

Name or title of DPO: Head of Democratic and Legal Services

Email address: dataprotectionofficer@woking.gov.uk

Postal address: Civic Offices, Gloucester Square, Woking, Surrey, GU21 6YL

Telephone number: 01483 743030

Contact details

Our full details are:

Full name of legal entity: Mole Valley District Council

Name or title of DPO: Legal Services Manager

Email address: tom.penlington@molevalley.gov.uk

Postal address: Pippbrook, Dorking RH4 1SJ

Telephone number 01306 885001 (switchboard)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). However, the ICO may ask if you have spoken to the authority first, therefore we would appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

As our services develop we will continue to update and review this notice to comply with both the law and customer feedback.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Technical Data** includes your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes [information about how you use our website, products and services.

We do not routinely collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) unless you include such data in your messages to us. It is likely that we will collect health data when you request a clinical waste collection service. In this case processing will be necessary for reasons of substantial public interest.

We do not voluntarily and pro-actively collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by phone or otherwise. This includes personal data you provide when you:
 - apply for our products or services; or
 - create an account on our website.

Where we collect your personal data for the provision of services, your data may be held in a central database designed by Amey. All four councils shall have access to this data and manage this system collectively and collaboratively in order to provide a more stream-line, robust waste collection service. We rely on Article 6(1)(e) relating to public interest to process the personal data in such a way.

- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the service or contract we are about to enter into or have entered into with you and to allow us to validate who you are and to deal with your queries effectively.
- Where it is necessary for the performance of a task carried out in the public interest.
- Where it is necessary for compliance with a legal obligation to which we are subject.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
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To register you as a new customer	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Performance of public task
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Performance of public task
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Performance of public task (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	(a) Performance of public task

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original

purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact the appropriate council's Data Protection Officer.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

In order to carry out the services or perform the contract entered into with you, we share your personal data with Amey.

We require Amey to respect the security of your personal data and to treat it in accordance with the law. We do not allow Amey or any other third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your

personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available via each Council's respective website.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are as follows:

- Request correction of the personal information that we hold about you.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.
- Request access to the personal data we hold about you.
- Object to the processing of your personal data in certain circumstances.

If you wish to exercise any of the rights set out above, please contact us via the appropriate council's Data Protection Officer

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We will respond to all legitimate requests within one month as the law requires but occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

Performance of a public task means processing your personal data where it is necessary for the Council to carry out one of its required activities

Performance of Contract means processing your data where it is necessary to carry out a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with either a legal or regulatory obligation that we are subject to.