

# SURREY ENVIRONMENT PARTNERSHIP: PRIVACY NOTICE

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## **Privacy Notice**

Surrey Environment Partnership (SEP) 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 SEP collects and processes your personal data through your use of this website.

The Surrey Environment Partnership comprises Surrey County Council and the 11 district and borough councils in Surrey.

We collect the following personal information:

- When you use the 'What do I do with...?' search tool or the Recycle for Surrey app – your IP address, browser and device information, mobile device unique identifiers and postcode.
- When you submit an enquiry to us or request a cloth nappy trial kit - name, email and postcode.
- If you choose to enter the prize draw when you answer the cloth nappy trial monitoring survey – email address.
- When you order a compost bin or food waste digester from Straight (getcomposting.com) or Great Green Systems, they will pass on your name, address and products ordered to us.
- When you donate furniture to one of the Surrey Reuse Network's furniture reuse organisations, they may pass on your name, address and items donated to us.
- When you submit a food waste reduction tip or recipe – your name.

We collect and process personal information about you in accordance with the General Data Protection Regulation ((EU) 2016/679) ('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**

SEP processes data on behalf of: Surrey County Council, Elmbridge Borough Council, Epsom & Ewell Borough Council, Mole Valley District Council, Guildford Borough Council, Reigate & Banstead Borough Council, Runnymede Borough Council, Spelthorne Borough Council, Surrey Heath Borough Council, Tandridge District Council, Waverley Borough Council and Woking Borough Council ('the Authorities').

The Surrey Environment Partnership (SEP) is made up of Surrey County Council (SCC) and the 11 district and borough councils in the county. It aims to manage Surrey's waste in the most efficient, effective, economical and sustainable manner.

The 11 district and borough councils are waste collection authorities (WCAs) and are responsible for the collection of Surrey's municipal waste which includes waste from households. The county council is the waste disposal authority and is responsible for the disposal and treatment of Surrey's municipal waste collected at the kerbside and waste and recycling from Surrey's community recycling centres (CRCs).

Each of the Authorities, who are 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 County Council**

Name or title of DPO: Data Protection Officer

Email address: DPO@surreycc.gov.uk

Postal address: County Hall, Room 138, Penrhyn Road, Kingston upon Thames, KT1 2DN

Telephone number: 03456 009 009

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

Our full details are:

Full name of legal entity: **Epsom & Ewell Borough Council**

Name or title of DPO: Data Protection Officer

Email address: dpo@epsom-ewell.gov.uk

Postal address: Town Hall, The Parade, Epsom, Surrey, KT18 5BY

Telephone number: 01372 732000

Our full details are:

Full name of legal entity: **Guildford Borough Council**

Name or title of DPO: Data Protection Officer

Email address: DPO@guildford.gov.uk

Postal address: Millmead House, Millmead, Guildford, Surrey GU2 4BB,

Telephone number: 01483 505050

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)

Our full details are:

Full name of legal entity: **Reigate & Banstead Borough Council**

Name or title of DPO: Data Protection Office

Email address: data.protection@reigate-banstead.gov.uk

Postal address: Town Hall, Castlefield Road, Reigate, Surrey, RH2 0SH

Telephone number:

Our full details are:

Full name of legal entity: **Runnymede Borough Council**

Name or title of DPO: Data Protection Officer

Email address: dpo@runnymede.gov.uk

Postal address: Runnymede Civic Centre, Station Road, Addlestone, Surrey, KT15 2AH

Telephone number: 01932 838383

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

Our full details are:

Full name of legal entity: **Spelthorne Borough Council**

Name or title of DPO: Data Protection Officer

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

Postal address: Knowle Green, Staines-upon-Thames, TW18 1XB

Telephone number: 01784 451499

Our full details are:

Full name of legal entity: **Tandridge District Council**

Name or title of DPO: Data Protection Officer

Email address: dpo@tandridge.gov.uk

Postal address: 8 Station Road East, Oxted RH8 0BT

Telephone number: **01883 722000**

Our full details are:

Full name of legal entity: **Waverley Borough Council**

Name or title of DPO: Data Protection Officer

Email address: dpo@waverley.gov.uk

Postal address: The Burys, Godalming, Surrey, GU7 1HR

Telephone number: 01483 523333

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](mailto:dataprotectionofficer@woking.gov.uk)

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

Telephone number: 01483 743030

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](http://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.

## **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 delivery address, email address and telephone numbers.
- **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.

### **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 details by filling in forms. This includes personal data you provide when you apply for our products or services.

- **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 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
To register you as a new customer	(a) Identity (b) Contact	(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
To monitor usage so we can make service	(a) Technical	(a) Performance of public task

improvements, provide reporting and for research and trend analysis	(b) Usage	
To allow us to answer any enquiries that you contact us with.	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Performance of public task
When you use the 'What do I do with...?' search tool or the SEP app version, to provide you with recycling and disposal instructions for your location.	(a) Identity (b) Contact (c) Technical	(a) Performance of public task
When you request a cloth nappy trial kit, to allow a volunteer trial kit host to contact you to arrange the loan of a kit and to contact you after the loan to request completion of an online monitoring survey. If you choose to enter the prize draw that incentivises completion of the monitoring survey, to select and contact a winner.	a) Identity (b) Contact	(a) consent
When you order a compost bin or food waste digester from Straight (getcomposting.com) or Great Green Systems, to ensure that we've correctly subsidised the cost for only Surrey residents.	a) Identity (b) Contact	(a) consent (b) Performance of public task
When you donate furniture to one of the Surrey Reuse Network's furniture reuse organisations, to allow us to pay the organisation a reuse and recycling credit to reflect the savings that Surrey County Council has made from the items being reused or recycled rather than landfilled and to report this reuse and recycling to the Government as part of national waste and recycling statistics.	a) Identity (b) Contact	(a) consent (b) Performance of public task
When you submit a food waste reduction tip or recipe, to publish your name alongside your tip or recipe.	(a) Identity	(a) consent

## **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. Error! Bookmark not defined. Disclosures of your personal data**

If an enquiry is specific to the service provided in a local district or borough area we may email the enquiry with the name, email address and postcode to the waste officers in the relevant Surrey district or borough council, so they can respond with an appropriate local answer.

Requests for a cloth nappy trial kit are emailed to volunteer trial kit hosts, who host the trial kits on behalf of Surrey Environment Partnership.

The 'What do I do with...?' search tool and the SEP app are provided under contract by ReCollect Systems Inc. In order to provide the tool and app they collect IP addresses, browser and device information, mobile device unique identifiers and postcodes as well as email addresses when help enquiries are submitted.

### **6. Error! Bookmark not defined. International transfers**

ReCollect Systems Inc, the provider of the 'What do I do with...?' search tool and the Recycle for Surrey app, are based in Canada.

In order to provide efficient and value for money services, we use third parties located in other countries to help us run our functions. As this includes countries outside the European Union ("EU") and to countries that do not have laws that provide specific protection for personal data, we have taken steps to ensure all personal data is provided with adequate protection and that all transfers of personal data outside the EU are done lawfully. Where we transfer personal data outside of the EU to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the EU requirements for the transfer of personal data outside the EU, such as the European Commission approved standard contractual clauses.

## **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.