



## **PRIVACY NOTICE**

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## 1. Introduction

This is a general privacy notice which tells you what to expect when we (North London Waste Authority (referred to as "NLWA", "we", "us" or "our" in this privacy notice)) collect personal data. Personal data means any information about an individual from which that person can be identified such as a name, address or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person. Personal data does not include data where the identity has been removed (anonymous data).

### **Purpose of this privacy notice**

This privacy notice gives you information on how NLWA collects and processes your personal data, what we do with your personal data and what legal rights are available to you.

We are committed to protecting and respecting your privacy. This notice together with the NLWA Data Retention Policy sets out:

- Important information about us and how you can contact us regarding the personal data that we hold about you;
- Purpose of the privacy notice;
- How we use your personal data;
- Specific data processing activities we undertake with the purpose and legal basis for processing that data.
- Our websites and cookies;
- How long we keep your personal data;
- The data security we have in place;
- International transfers;
- Your legal rights; and
- Changes or updates to the privacy notice.

Please read all sections carefully to understand the purpose for our processing and our practices regarding your personal data.

Some sections of this privacy notice are provided in a layered format so you can click through to the specific areas easily. Alternatively, you can download a pdf version of the policy [here](#).

## 2. Important information and who we are

### Controller

When we collect your personal data or when you provide us with your personal data, NLWA is the controller and responsible for your personal data. We have 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 using the details set out below.

### Contact details

Postal address:

Data Protection Officer

North London Waste Authority

Unit 1B, Berol House, 25 Ashley Road

Tottenham Hale

London, N17 9LJ

Name and title of DPO: Barbara Herridge, Data Protection Officer

Email address: [Communications@nlwa.gov.uk](mailto:Communications@nlwa.gov.uk)

Telephone number: 0208 489 5654

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)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 3. The data we collect about you

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, maiden name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes postal address, email address and telephone numbers.
- **Employment History and Qualifications Data** includes qualifications, employment history, skills and experience.

- **Technical Data** includes your login data, browser type and version, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

We will only collect your **Special Category Data** in the limited circumstances set out below and only with your explicit consent. **Special Category Data** includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, health, trade union membership or genetic data. It also includes biometric data where it is collected for the purpose of uniquely identifying a natural person. The Special Category Data we collect and the circumstances we collect the data are:

- We record your ethnicity when you apply for our Nappy Voucher Scheme.
- We take photographs of individuals at our events, which may be Special Category Data.

We only collect information about criminal convictions and offences in order to carry out a check with the Disclosure and Barring Service for the purpose of employment for a position which requires staff to be checked with the Disclosure and Barring Service.

#### 4. 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 and Contact details by filling in forms or surveys/questionnaires at our events or on our websites or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - sign up to attend our events or receive our invitations;
  - subscribe to our newsletters, progress reports or updates on our activities or projects;
  - request for information to be sent to you, including information requests under the Freedom of Information Act 2000 (FOI) or the Environmental Information Regulations 2004 (EIR);
  - enter a competition, prize draw or participate in a survey we are carrying out;
  - apply for a grant from us;
  - give us feedback;
- **Contracts and procurement.** You may provide us with your personal data as part of a tender process we are undertaking for which you want to be considered as a bidder or to fulfil a contract with us; or
- **Consultation responses.** You may provide us with your personal data as part of your response to a consultation we are carrying out to fulfil a legal obligation or to perform our functions as a public body.
- **Our contractors.** You may provide your data to one of our contractors delivering a contract on our behalf and the contractor sends us your personal data as part of the delivery of the relevant contract. For example when you participate in our Nappy Voucher Scheme.

- **Third parties or publicly available sources.** We may receive personal data about you from third parties and public sources as set out below:
  - Technical Data from analytics providers such as Google;
  - Identity and Contact Data from publicly available sources such as the Companies House.

## 5. 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 needed to perform our public task as a public body fulfilling our statutory functions. For example collecting vehicle registration numbers which can be linked back to the owner when people visit a reuse and recycling centre. We collect the vehicle registration details in order to prevent unauthorised entry to a reuse and recycling centre.
- Where needed to perform the contract we are about to enter into or have entered into with you. For example where we hold details of key personnel or account manager of a supplier.
- Where you have provided us with consent to do so. For example where we have sought your consent to send you information about our annual waste prevention conference.
- Where we needed to comply with a legal or regulatory obligation. For example if we are responding to a request for information under the Environmental Information Obligations (EIR) we will need the name and contact details of the person to whom we must send the information requested.

Paragraph 6 below sets out more about the types of lawful bases that we will rely on for the specific processing activities we undertake.

Where we are relying on consent to process your personal data, you have the right to withdraw consent at any time by emailing us at [Communications@nlwa.gov.uk](mailto:Communications@nlwa.gov.uk)

## 6. Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we may 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 basis depending on the specific purpose for which we are using your data. Please [contact us](#) if you would like an explanation about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Table 1: Purpose and Lawful Bases

Purpose/Activity	Type of data	Lawful basis for processing your data
To register you on our database to receive updates and newsletters about our future public waste prevention events	Identity and Contact	Consent
To provide you with information about waste prevention services we offer	Identity and Contact	Consent
To invite you to our waste prevention events, to pre-register your attendance e.g. for a repair service, or to obtain feedback on the events	Identity and Contact	Consent
To notify you about changes to our waste prevention services or events	Identity and Contact	Consent
To organise NLWA's waste prevention annual conference – the Waste Prevention Exchange	Identity and Contact	Consent
To respond to your request for progress reports or updates on our activities or projects	Identity and Contact	Consent Performance of a contract with you
To manage our relationship with you which will include notifying you about changes to our privacy policy.	Identity and Contact	Consent Necessary to comply with a legal obligation Public tasks to perform our official functions
To enable you to partake in a prize draw or competition	Identity and Contact	Consent Performance of a contract with you
To enable you to complete a survey or feedback questionnaire	Identity and Contact	Consent Necessary to comply with a legal obligation

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing your data</b>
To respond to your request for information, including Freedom of Information (FOI) or Environmental Information (EIR) requests.	Identity and Contact	Necessary to comply with a legal obligation
To process grant applications you make to us or our appointed contractor	Identity, Contact	Performance of a contract with you
To receive and process real nappy voucher applications you make to us or our appointed contractor	Identity, Contact and Special Category Data	Explicit Consent Performance of a contract with you
To identify users of our Reuse and Recycling Centres (RRCs) to prevent unauthorised entry to the RRCs	Identity	Public tasks to perform our official functions
To process your compost delivery requests	Identity and Contact	Consent
To issue recycling third party credits.	Identity and Contact	Consent
To carry out consultations required by law	Identity and Contact	Necessary to comply with a legal obligation
To carry out a procurement process, or to respond to your request before entering into a contract	Identity, Contact and Employment History and Qualifications	Performance of a contract with you
To carry out our obligations under the contract between us	Identity and Contact	Performance of a contract with you
To grant access to data on waste movements or any information we are required to provide as part of our statutory functions	Identity and Contact	Public tasks to perform our official functions



<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing your data</b>
To investigate and respond to a complaint you submitted to us	Identity and Contact	Public tasks to perform our official functions
To carry out a survey to find out if residents are happy with our services e.g. surveys of Reuse and Recycling Centres in our area	Identity and Contact	Consent
To carry out research that will facilitate the delivery of our public functions	Identity and Contact	Public tasks to perform our official functions
To send to our constituent borough councils on a need to know basis or as a result of a request e.g. if you ask us at an event to pass on your contact details to one of the north London boroughs in order to access services.	Identity and Contact	Consent
To share information with other public bodies responsible for auditing or administering public funds for fraud, bribery and crime prevention	Identity and Contact	Necessary to comply with a legal obligation
To use (a) photograph(s) of you to promote waste reduction, reuse and recycling and to enable our partners (usually the constituent boroughs) to do so too in a cost efficient way	Identity, Contact and Special Category Data	Explicit Consent

## 7. Recipients of Personal Data

We do not share personal data with third parties outside NLWA except in the following limited circumstances and for the purposes set out in the table in paragraph 6:

- To our service providers and professional advisers to deliver our contracts for the performance of our public functions or to meet a legal obligation. Any information provided to our service providers or professional advisers is subject to strict contractual confidentiality obligations;
- To our constituent borough councils and only on a need to know basis or as a result of a request from you, in order to perform our statutory functions or to meet a legal obligation or so that you can access a borough provided service. For example, we may pass on your contact details with your consent if you attend our event for which you will be eligible to receive local green points or credits from the borough for attendance. We also have contractual arrangements with some of our constituent boroughs which are explained below.
  - NLWA is part of the London Borough of Haringey's IT network. London Borough of Haringey provides all our IT and system administration services. Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used.
  - NLWA staff are employed by the London Borough of Camden. London Borough of Camden handles all appeals relating to complaints made to NLWA regarding any of our services or our actions. Where appeals in relation to complaints are made to the London Borough of Camden in accordance with NLWA's complaints procedure, personal information held by NLWA in relation to the complaint may be shared with Camden's Central Complaints Unit. A copy of our complaints procedure is available [here](#).

Details on NLWA and our relationship with our constituent boroughs can be found [here](#)

- To regulators and other authorities acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances.

- To other public bodies to comply with any applicable law, regulation, code of practice or enforceable government guidance. Please see our National Fraud Initiative Statement below showing when we share personal data with other public bodies to prevent or detect fraud.

We require all recipients of personal data from us to respect the security of your personal data and to treat it in accordance with the law. When our service providers are processing your personal data on our behalf, we do not allow 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.

### **NLWA National Fraud Initiative Statement**

NLWA is required by law to protect the public funds it administers. We may share information provided to us with other bodies responsible for auditing or administering public funds, or where undertaking a public function, or order to prevent and detect fraud. The Cabinet Office is responsible for carrying out data matching exercises.

Data matching involves comparing computer records held by one body against other computer records held by the same or another body to see how far they match. This is usually personal information. Computerised data matching allows potentially fraudulent claims and payments to be identified. Where a match is found it may indicate that there is an inconsistency requiring further investigation. No assumption can be made as to whether there is fraud, error or other explanation until an investigation is carried out.

Working with our constituent borough councils we participate in the National Fraud Initiative: a data matching exercise to assist in the prevention and detection of fraud. We are required to provide particular sets of data to the Minister for the Cabinet Office for each matching exercise as detailed [here](#).

The use of data by the Cabinet Office in a data matching exercise is carried out under Part 6 of the Local Audit and Accountability Act 2014. Data matching by the Cabinet Office is subject to a [Code of Practice](#).

Further information on the Cabinet Office's legal powers and reasons why it matches particular information can be found [here](#). For further information on data matching at NLWA and the reasons why particular information is matched please see [here](#).

## **8. Our Websites and Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. We do not store any personal information in cookies. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

We do not make any attempt to find out the identities of those visiting any of our websites, namely [nlwa.gov.uk](http://nlwa.gov.uk), [wiseuptowaste.org.uk](http://wiseuptowaste.org.uk) or [northlondonheatandpower.london](http://northlondonheatandpower.london). This privacy notice applies to all our websites. Our sites may, from time to time, contain links to and from the websites

of our constituent boroughs or related organisations. We do not control these third-party websites and are not responsible for their privacy statements or policies. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## 9. International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**). However, when we share your personal data with our service providers, it may involve transferring your data outside the European Economic Area (**EEA**).

Whenever our service providers transfer your personal data out of the EEA, we will require all service providers that are processing your personal data to ensure a similar degree of protection is afforded to our information by ensuring at least one of the following safeguards is implemented:

- your personal data is transferred to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- specific contracts approved by the European Commission are used which give personal data the same protection it has in Europe..
- your personal data is protected as the service provider requires all its group companies to follow the same rules when processing your personal data. These rules are called "binding corporate rules".
- Where your personal data is transferred to the US, the transfer data to them is made if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by a service provider when transferring your personal data out of the EEA.

## 10. 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 are all 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.

Where we carry out research for statistical purposes, we always ensure that we anonymise the personal data we hold.

## 11. 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.

Our Data Retention Policy is based on the following principles:

- compliance with data protection legislation;
- regular reviews of data we hold;
- sensible retention periods that allow us to use the data for the purposes for which it was collected; and
- active deletion of personal data that is no longer used.

Details of retention periods for different aspects of your personal data are available in our [Data Retention Policy](#).

## 12. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. The lawful basis of processing identified in this Privacy Policy can affect which rights are available to you. Please contact us if you want further information regarding which rights apply to your personal data. Please click on the links below to find out more about these rights:

- *Request access to your personal data.*

Request access to your personal data (known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- *Request correction of your personal data.*

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- *Request erasure of your personal data.*

Request erasure of your personal data. This enables you to ask us to delete or remove your personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete where we may have processed your personal data unlawfully or where we are required to erase your personal data to comply with a legal obligation or where we are relying on consent as the lawful basis for processing and you withdraw your consent. Note, however, that this right is not absolute and we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. For example, you will not have this right where the legal basis for processing is the performance of a public task or compliance with a legal obligation.

- *Request restriction of processing your personal data.*

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. Note, however, that this right is not absolute and we may not always be able to comply with your request to restrict processing for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- *Request transfer of your personal data.*

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- *Right to withdraw consent.*

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

- *Object to processing of your personal data.*

Object to processing of your personal data where there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. Note, however, that this right is not absolute and we may not always be able to comply with your request to stop processing if (i) we have compelling legitimate grounds for the processing, which override your rights and freedoms or (ii) the processing is for the establishment, exercise or defence of legal claims. We will communicate our reasons to you, if applicable, at the time of your request.

If you wish to exercise any of the rights set out above, please **contact** our Data Protection Officer.

No fee is 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 try to respond to all legitimate requests within one month. 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.

### **Changes to the privacy notice**

This version of the privacy notice was last updated on 22 June 2018 and historic versions are archived [here](#). Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

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