

Privacy Notice

This document describes how and why we collect, store, protect, process and share the data you give to us. We collect personal data to help us to provide a subscription garden waste collection service.

Date of Issue: 23 July 2018

Update History:

23 July 2018	First issue of a new Privacy Notice
31 May 2019	Review for second year of the scheme – specified payment address and subscription address
20 July 2020	Review for third year of the scheme – clarification of legal basis for processing, added information about third party processors for renewal emails and payment processing.

Directorate: Place
Department: Environment
Team: Waste

About the Organisation

West Berkshire Council is the Data Controller. This means it is ultimately responsible for the data it holds about you.

Contact Address:

West Berkshire Council
Market Street
Newbury
Berkshire
RG14 5LD

ICO Registration Number: **Z6825178**
<https://ico.org.uk/ESDWebPages/Entry/Z6825178>

The Data Protection Officer

The Data Protection Officer for West Berkshire Council is:

James Gore AMBCS BA

Contact details can be found here: <http://info.westberks.gov.uk/dpofficer>

What data will we collect about you?

Data we will collect and process may include:

- Your name
- Subscription household address
- Email address
- Telephone number (if provided)
- Payment details – this includes details of the associated address for card payments or direct debits

These details are collected and entered in a garden waste collection electronic database.

What will we use your data for?

We will use your data to:

- Contact you with specific information about your subscription to the garden waste collection service
- Process/renew your card payment or direct debit mandate
- Confirm you have paid for the service
- Deliver any bins, or other material related to the subscription, to your address
- Add your address to the collection crews' schedules
- Send a renewal email
- Send you information about waste and recycling or other services provided by the council (only if you have opted-in to receive this)

Near the time when your subscription ends, the council will contact you using your provided details through a system provided by a partner firm e.g. Granicus (GovDelivery) to ask if you wish to arrange a re-subscription to the service. Your data will only be used for this purpose within the partner firm's database and not retained for any longer than is required. If you end your subscription, your data will be deleted, and it will not be shared onwards with any other third party.

Who will see your data?

Your data will be seen by the West Berkshire Council Waste team and address details will be shared with a small selection of third parties that are contracted to provide parts of the garden waste collection service, including our contractors Veolia and Permiserv.

The payment data provided will only be handled for subscriptions within the Council using our payment systems or with a small selection of third party partners e.g. Bottomline or Civica, who help us to receive and process customer payments. This data will not be shared with any third party not involved in the provision of your garden waste subscription service.

If you subscribe to the service, we will record the date of the payment and the method of payment.

The legal basis for processing

When the council processes personal data it needs to identify a legal basis for doing so.

In this case, the legal basis for processing is covered by Article 6b of the General Data Protection Regulations (GDPR) – namely that it is taking place with a view to enacting a contractual agreement between householders and the council in order to arrange for the collection of garden waste as part of a subscription service.

Clearly, if you do not wish the council to process your personal data, it will be unable to establish a contract to provide the service for you.

How long will your data be kept?

Your data will not be kept for any longer than necessary. You can check how long the organisation will keep each type of data against West Berkshire Council's retention schedule (www.westberks.gov.uk/retention).

How is your data stored and processed?

Your data will be held on the council's electronic database designed for staff use only and will be protected using up-to-date technical and organisational security measures.

In addition, your data may be held by the following third parties:

- Bottomline (<https://www.bottomline.com/uk>) solely for the purposes of processing direct debit payments.
Data held by Bottomline is held securely in the UK and purely used to maintain the payment process and is not retained, transferred or repurposed.
- Permiserv (<https://permiserv.com/>), solely for the purpose of creating and dispatching subscription stickers to go on the green bin to allow operatives to identify those customers who have subscribed.
Data is held securely on encrypted databases, and does not leave the UK. Data is held by Permiserv for a period of 18 months.

Transfer overseas

Your data will not be stored or sent outside of the UK.

Your rights

You have a number of rights when it comes to the data we hold about you. These are detailed on our request form (www.westberks.gov.uk/dprequest) that also allows you to make a request for us to take action about something.

Complaints

If you've already told us we need to do something, but we haven't responded in a way you're satisfied with, you can complain to the Information Commissioner's Office (the ICO). It's easiest to do this online via the ICO website (<https://ico.org.uk/concerns/handling/>), but you can also do so in writing to:

The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

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