

Who are we?

H W Martin Waste Ltd are committed to protecting your privacy and personal data and we comply with the UK General Data Protection Regulation (GDPR) and the current data protection legislation. This privacy notice explains our approach in line with current legislation.

We are a privately owned company that has been contracted to provide the Household Waste Recycling Centre (HWRC) services for Barnsley Metropolitan Borough Council and City of Doncaster Council (we will call them 'the Councils').

We are the 'Joint Controller' of the personal data you provide to us as we have a contract with the Councils and provide a public service on their behalf.

Our Data Protection Officer is Gavin Peace. You can contact them at data@hwmartin.com or by writing to Mr G Peace, HW Martin Holdings, Fordbridge Lane, Blackwell, Alfreton, Derbyshire, DE55 5JY or by phoning 01773 860600.

What is personal data?

Personal data is any data that can identify a living individual. This may be name, address, contact details, an image from CCTV, your vehicle details where the vehicle is registered to you and more.

What data we need?

We need to collect the following personal data from you:

- Name
- Address and postcode
- Contact details (phone number and or email address)
- Vehicle registration number
- Vehicle ownership or permission to use details which may be the V5c, a lease agreement or letter from an employer.

We collect this when you create an account, make an application for a pass/permit or when you book a time slot to visit a HWRC.

We do collect personal data from any documents that you upload to verify your vehicle details.

We also collect information such as your image where you are captured on CCTV or image and voice when captured on the Body Worn Video (BWV) used by our staff, and we have additional security and procedures in place for this.

We will not collect any personal data from you we do not need in order to provide you with your pass/permit, or time slot to visit your chosen HWRC or that helps us manage the HWRC sites to ensure they are safe for everyone to use.

It helps us if you provide accurate personal data and any other necessary information, and tell us about any changes to your personal data.

Why we need it.

We need to know your personal data to be able to provide you with an account on our system, provide you with a pass/permit to use the HWRC, and to enable you to book a time slot to visit one of the centres.

We may need to use your contact details to speak to you about any bookings you have made to visit one of the HWRC sites.

As of our pass/permit process we need to verify the vehicle details for the vehicle you will be using. This means we use the personal data from documents you upload that help us with the verification process.

The personal data you provide to us or that we collect will be used for management reports, audits, to collate statistics about visits. Where necessary we will use data to support the Councils in any action they may need to take if there is anti-social behaviour at the HWRCs or, unauthorised or illegal use or items being taken to the HWRC. Where possible we will anonymise (remove identifiable personal data) from data used for reports or audits.

We will also need to collect your personal data for any compliments, queries, or the occasional complaint.

Where you are representing a company and we collect your personal data this will be for Trade Waste disposal processes and enforcement.

What are the legal bases or reasons that allow us to do this?

We have identified a number of legal basis or reasons that allow us to collect and use your personal data. These are defined in the UK GDPR.

- We need to comply with a number of laws around waste, environmental permits and the control of hazardous wastes such as asbestos so we need to know who is visiting the HWRC sites and in some cases, what they are bringing to the sites to dispose of. The legal basis this is **Legal Obligation**.
- We also need to keep any financial records to comply with HMRC and Financial regulations and law so the Legal basis for these records is **Legal Obligation**.
- When you make an application for a permit, or book a time slot, this forms a contract with us and the Councils so the legal basis here is a **Contract with you**.
- We are undertaking a task that is carried out in the public interest and because of this, and our contract with the council, the legal basis is **Public Task**.

How we protect and store your data.

We ensure that all access is restricted to those who need access and take all reasonable and necessary technical and company measures to prevent unauthorised access, misuse or alteration, or loss.

All the personal data we process is processed by our staff and contracted suppliers in the UK. For the purposes of the pass/permit and booking system we have a contract with the supplier and assurances that the system and storage is located in the UK. For the images we store this in the UK at our main location.

Sharing your data.

We do not allow third parties to have access to your personal data unless we are required to share your data with them to fulfil a contract (such as the Councils), where we are required to share by law or we are ordered to do so by a Court.

We may be required to share with government agencies such as the Environment Agency from time to time, but we will ensure that they have laws that permit them to request data.

How long we keep it.

When you create an account on our system, your data will be held securely for the lifetime of the account.

When a permit has been granted, any data held for that permit will be held for the period of the permit which is currently 3 years. If you renew your permit, we will continue to hold this data.

Where the data is images or voice from CCTV or BWV, this will be held for a period of 31 days unless it is required for enforcement action or as evidence of anti-social behaviour. At 31 days, the images and recordings are automatically over-written.

Details of vehicle ownership or registration from uploaded documents are kept for up to 31 days for verification purposes, then securely deleted.

Any financial records will be kept for the current financial year plus another 6 years to comply with HMRC and financial regulations.

When you no longer hold a permit, or where you ask us to remove or delete your data and we do not need to keep it for contract or legal purposes, we will securely delete your personal data from our systems.

Overseas Transfers and decision making

We do not transfer your personal data to countries outside of the UK.

We do not make automated decisions on your data, nor do we use your data for profiling purposes.

What are your rights?

You have a number of rights relating to the processing of your personal data. These are:

You have certain rights in respect of the information that we hold about you. These are:

- The right to be informed about the processing of your personal data (that is why we provide this privacy notice);
- The right to request access to the personal data that we hold about you;
- The right to ask us to rectify any incorrect personal data that we hold about you;
- The right to ask us to erase your personal data (also called the right to be forgotten);
- The right to restrict processing in some circumstances;
- The right to data portability where you have provided your personal data with consent and we process this automatically;
- The right to object to processing and in particular, the right to object to using your personal data for marketing purposes;
- The right to not be subject to automated decision-making and profiling.

Where you provide your personal data with consent, you can withdraw this consent at any time by contacting us at data@hwmartin.com or by writing to Mr G Peace, HW Martin Holdings, Fordbridge

Lane, Blackwell, Alfreton, Derbyshire, DE55 5JY or by phoning 01773 860600. You should contact us at this email or address if you wish to exercise any of your rights.

If you exercise your rights including access to your personal data, we generally have to respond within one month of receiving your 'request'. We may need to liaise with the Councils when dealing with your 'request'.

Ordinarily we do not charge a fee. We will only consider charging a fee if you ask for a second copy of data we have already provided to you, or your request is repeated and a reasonable time has not elapsed between requests, or we consider your request to be unfounded (for example, there is no real reason behind it) or it is excessive. If a fee is to be made, we are allowed to charge a reasonable fee and we will tell you about this before we continue with your request. We may also refuse your request if it is unfounded, repeated, or excessive but we will explain our reasons if this applies.

Complaints

If you wish to raise a complaint on how we have handled your personal data, it would be helpful if you would give us the opportunity to look into the issue and you can contact our Data Protection Officer who will investigate the matter.

If you do not wish to complain to us directly, you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, Telephone 0303 123 1113 (local rate) or by completing their online form at [Data protection and personal information complaints tool | ICO](#)

More information

More information on data protection and your rights can be found on the Information Commissioner's website at www.ico.org.uk.

Reviews

This Privacy Notice may change from time to time, for example, if the law around personal data or information changes or for operational purposes. We recommend that you to visit this privacy notice regularly to keep up to date with any changes.