

## Cheshire West Recycling Ltd Privacy Notice

### 1. Introduction

At Cheshire West Recycling (CWR), we take your privacy seriously. This Privacy Notice explains how we collect, use, share, and protect your personal data whenever you interact with us—whether through our website, when you use our services, or when you get in touch. This notice applies to all individuals whose data we process, including customers, website visitors and business contacts.

We process personal data in line with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and any other relevant laws.

### 2. Who we are

**Data Controller/Processor:** Cheshire West Recycling Limited

**Registered Address:** Road Three Operations Hub, Winsford, Cheshire, CW7 3PD

**Website:** <https://cwrecycling.co.uk>

**Contact:** [info@cwrecycling.co.uk](mailto:info@cwrecycling.co.uk)

In most cases, we act as a data controller, meaning we determine how and why personal data is processed. However, in some circumstances, such as when we provide services on behalf of a local authority or another organisation, we may act as a data processor, processing personal data under their instructions. In these cases, the relevant organisation remains the controller, and we follow their instructions in line with our contractual and legal obligations.

**Data Protection Officer (DPO):** [dpo@cwrecycling.co.uk](mailto:dpo@cwrecycling.co.uk)

If you have any questions about how we use your data or this Privacy Notice, please get in touch with our DPO.

### 3. What personal data we collect

We may collect and process the following categories of personal data:

- Contact Information: e.g., your name, email address, phone number, and postal address.
- Business Information: e.g., job title, company name, and business contact details.
- Service Data: e.g., details of your recycling or waste management services, communications with us, and your service preferences.
- Technical and Usage Data: e.g., your IP address, browser type, device details, and website usage data (collected through cookies and analytics tools, please see our cookie notice for further information <https://cwrecycling.co.uk/cookie-notice>)

- Marketing Preferences: e.g., your preferences about receiving marketing communications from us.
- Any other information you voluntarily provide: e.g., information shared when contacting us or using our services.

We do not intentionally collect or process special category data (such as health or ethnicity) unless it is necessary and you provide explicit consent.

#### **4. How we use your personal data**

We use your data for several reasons, including:

- Providing Services: To manage, deliver, and improve our recycling and waste management services.
- Customer Support: To communicate with you about orders, quotes, service updates, and respond to your enquiries.
- Compliance: To meet our legal obligations, including statutory waste management reporting and regulatory requirements.
- Business Operations: To improve our services, manage relationships with partners, and conduct business analysis.
- Marketing and Communication: To send you updates, newsletters, and offers where you have provided your consent or we have a legitimate interest.
- Website Management: To maintain and improve our website's performance and security.

#### **5. Lawful bases for processing**

We rely on one or more of the following legal bases to process your personal data:

- Performance of a Contract: Where we need to process your data to provide recycling and related services.
- Public Task: Where we are acting in the public interest or exercising official authority delegated by a public body (e.g. household recycling and waste collection).
- Legal Obligation: To comply with applicable laws and statutory obligations.
- Legitimate Interests: To run our business effectively, improve our services, prevent fraud, and promote our services—while respecting your rights and freedoms.
- Consent: Where required, e.g., for optional marketing communications or where you have explicitly agreed to specific processing.

#### **6. How we share your personal data**

We may share your personal data with:

- Service Providers and Processors: Such as IT support, software providers, email platforms, cloud hosting services, and logistics partners. These organisations only process your data under our instructions and are contractually bound to protect your information in line with UK data protection law.

- **Regulatory Authorities:** Such as the Environment Agency, HSE, DEFRA and Cheshire West and Chester Council, where we are required to share data to meet legal or contractual obligations, or to fulfil public duties.
- **Professional Advisors** (Independent Controllers Including accountants, auditors, legal advisors, and insurers who provide professional services to us. They determine their own legal responsibilities as data controllers.
- **Business Transfers:** If we are involved in a merger, reorganisation, asset sale, acquisition or other corporate change, your personal data may be shared with third parties as part of that process, under confidentiality obligations and in accordance with data protection law.

We require all third parties to protect your personal data appropriately and, where acting as our processors, to process it only on our instructions and for specified purposes.

## **7. International data transfers**

If we transfer your data outside the UK, we ensure appropriate safeguards are in place such as Standard Contractual Clauses together with the UK Addendum and, where required, a Transfer Risk Assessment to determine the level of protection. This is to ensure your data is protected to the same high standards as they are under UK law.

## **8. How we protect your data**

We take data security seriously. We use appropriate technical and organisational measures to protect your personal data from loss, misuse, and unauthorised access, such as:

- Secure servers and restricted access.
- Encryption and secure communication protocols.
- Regular staff training on data protection principles.
- Data breach response procedures to detect, report and manage any security incidents.

## **9. Data retention**

We keep your data only for as long as necessary to fulfil the purposes set out in this Privacy Notice or to comply with legal requirements (such as statutory waste record-keeping). Retention periods depend on the type of data and legal or operational requirements.

## **10. Your rights**

You have the following rights under data protection law:

- **Right of access:** To request a copy of the personal data we hold about you.
- **Right to rectification:** To ask us to correct or complete inaccurate or incomplete data.
- **Right to erasure:** To request deletion of your data, where appropriate.
- **Right to restriction:** To ask us to stop or limit processing your data.

- **Right to object:** To object to certain types of processing (e.g., direct marketing).
- **Right to data portability:** To receive your data in a structured, machine-readable format.
- **Right to withdraw consent:** Where processing is based on your consent.

Some of these rights apply only in certain situations. If you make a request, we'll always explain what we can do and why, based on the type of data and the reason we hold it. To exercise any of these rights, please contact our DPO at [dpo@cwrecycling.co.uk](mailto:dpo@cwrecycling.co.uk)

### 11. Cookies and tracking technologies

Our website uses cookies and similar tracking technologies to improve functionality and measure usage. You can manage your cookie preferences via your browser settings. Where we are required to do so by law, we will ask for your consent before setting non-essential cookies. For more information, please see our Cookie Policy.

### 12. Automated decision-making

We do not make decisions based solely on automated processing that could significantly affect you.

### 13. Complaints

If you have concerns about how we handle your data, we encourage you to contact our DPO first via [dpo@cwrecycling.co.uk](mailto:dpo@cwrecycling.co.uk)

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

- Website: <https://www.ico.org.uk>
- Phone: 0303 123 1113

### 14. Updates to this notice

We may update this Privacy Notice from time to time to reflect changes in our practices or legal requirements. Updates will be published on our website, and we encourage you to check back regularly.

**Last updated: 13<sup>th</sup> June 2025**