

Cheshire West Recycling Ltd Privacy Notice

1. Introduction

At Cheshire West Recycling (CWR), we take your privacy seriously. This notice applies to all individuals whose personal data we process, including customers, website visitors, users and visitors of CWR-operated sites and Household Waste Recycling Centres (HWRCs), 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

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

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.
- **Surveillance and site monitoring data:** Where you visit or use CWR-operated premises or Household Waste Recycling Centres (HWRCs), we may collect images and other information through fixed CCTV, vehicle-mounted cameras and

body-worn video cameras. This may include images of you, your vehicle and vehicle registration number, together with the date, time and location of recordings. Audio recordings may also be collected in designated operational areas where audio-enabled CCTV is in use.

- 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 routinely seek to collect special category personal data from members of the public. However, such information may occasionally be provided to us or captured incidentally, for example when dealing with an incident, complaint or other interaction. Where we process special category personal data, we will only do so where necessary and where an appropriate lawful condition applies under data protection law.

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, including the operation of Household Waste Recycling Centres (HWRCs).
- 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.
- Safety, security and surveillance: We may use CCTV, vehicle-mounted cameras and body-worn video where necessary and proportionate to protect the health, safety and wellbeing of employees and members of the public; prevent, detect and investigate crime, disorder or antisocial behaviour; investigate accidents and incidents; resolve complaints, claims or disputes; protect CWR assets and property; and manage operational and safety risks. Where audio recording is used alongside fixed CCTV, it will only be used for the specific purposes for which it has been authorised and will be subject to appropriate safeguards, including clear signage.
- 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.
- **Recognised Legitimate Interests:** Where processing is necessary for a recognised legitimate interest specified in data protection law, such as the prevention, detection or investigation of crime.
- **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, surveillance and security system providers, email platforms, cloud hosting services and logistics partners. Where these organisations process personal data on our behalf, they are required to protect your information and process it in accordance with our instructions and applicable 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.
- **Police and law enforcement authorities:** We may share relevant personal data, including CCTV, body-worn video or audio recordings where applicable, with the police or other law enforcement authorities where this is necessary and lawful, for example for the prevention, detection or investigation of crime or in connection with legal proceedings.
- **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

Where we transfer your personal data outside the UK, we will ensure that appropriate safeguards are in place in accordance with UK data protection law. These may include an adequacy decision or appropriate contractual safeguards, together with any required assessment of the protections available for your personal data.

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 systems, appropriate access controls and restricted access to personal data based on business need.
- 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 personal data only for as long as necessary for the purposes for which it was collected, or to meet applicable legal, regulatory or contractual requirements. Retention periods vary depending on the type of personal data and the purpose for which it is processed.

Surveillance recordings are retained for defined periods and are securely deleted or overwritten when they are no longer required. Where a recording is required in connection with an incident, investigation, complaint, claim or legal proceedings, it may be retained for longer where necessary for that purpose.

Further information about specific retention periods is available on request.

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. If your request relates to CCTV, body-worn video or audio recordings, please provide as much information as possible to help us identify the relevant recording, such as the date, approximate time, location and a description of yourself or the circumstances.

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 personal data, we encourage you to contact our DPO first at 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: 29th September 2026