

Privacy Notice - Customers

Fresh Start Waste Services Ltd (Fresh Start) are committed to complying with the General Data Protection Regulation and the Data Protection Act 2018, once enacted. Looking after the personal information you share with us is very important, and we want you to be confident that your personal data is kept safely and securely and to understand how we use it to offer you a better and more relevant waste service.

We have published this notice to help you understand

- how and why Fresh Start collect information from you;
- who we share your information with, why and on what basis; and
- what your rights are.

If we make changes to this notice we will notify you by updating it on our website. Fresh Start will be what is known as the 'Data Controller' of the personal data you provide to us, and we will sometimes refer to ourselves in this notice as "we" or "us". By Data Controller, this means Fresh Start determines the purposes and way in which any personal data are, or will be, processed.

Should you need to contact us please write to:

Data Protection Officer Fresh Start Waste Services Ltd, Scott House, 114 Higher Green Lane, Astley, Manchester, M29 7JB or via info@fswaste.co.uk quoting Security and Privacy Enquiry.

This privacy notice was last updated on 16th May 2018.

What information we collect when you register and why?

When you buy services from us, you are entering into a contract with us. You will need to set up an account before ordering from us, so we can set this up we will ask you to provide some personal information such as;

- full name
- address (and previous addresses)
- contact numbers, and
- email address.

As an existing customer if you have contracted with us using a credit or debit card, or we have taken these details for a payment authorisation. If you set up a direct debit payment, we will also collect bank details from you.

When you apply for a credit account, we get information about you from credit reference agencies. This is covered in more detail in the section, Who we share your information with and why.

How do we use your information?

Data Protection says that we are allowed to use and share your personal data only where we have a proper reason to do so. The law says we must have one or more of these reasons and these are:

- Contract - your personal information is processed in order to fulfil a contractual arrangement e.g. in order to collect your waste.
- Consent – where you agree to us using your information in this way.
- Legitimate Interests - this means the interests of Fresh Start in managing our business to allow us to provide you with the best service in the most secure and appropriate way.
- Legal Obligation – where there is statutory or other legal requirement to share the information e.g. when we have to share your information for law enforcement purposes.

Here is a list of the ways that we may use your personal information, and which of the reasons described above we rely on to do so. Where we list legitimate interests as a reason, we also describe below what we believe these legitimate interests are.

What We Use Your Personal Information For	Our Reasons (Legal Basis)	Our Explanation Of Fresh Start's Legitimate Interests
Set up your Fresh Start account	<ul style="list-style-type: none"> • Legitimate interest 	Process efficiency in dealing with such activity.
Process your collections	<ul style="list-style-type: none"> • Fulfilling a contract 	N/A
Notify you of your collection status.	<ul style="list-style-type: none"> • Legitimate interests 	Process efficiency in dealing with such activity, and to make improvements to our services.
Manage your account/ provide customer services to you.	<ul style="list-style-type: none"> • Legal obligation/ Legitimate interests (depending on nature of services) 	Keeping our records up to date, handling our customer contact efficiently and effectively, working out which of our services may interest you and telling you about them.
To detect, investigate and report financial crime (e.g. Fraud)	<ul style="list-style-type: none"> • Legal Obligation / legitimate interests 	Developing and improving how we deal with financial crime. Complying with any legal obligation placed on us by regulators such as the FCA. Complying with any regulations that apply to us. Process efficiency in dealing with such activity, and to make service and process improvements.
Undertake service personalisation and administration.	<ul style="list-style-type: none"> • Legitimate interests 	Developing products, services, applications and designs that attract and retain customers. Improving customer interaction with our sites. Defining types of customers for new products or services
Marketing communications to inform you of special offers and promotions,	<ul style="list-style-type: none"> • Legitimate interests 	Developing products and services that attract and retain customers. Improving customer interaction through our sites.

Notifying you about enhancements to our services, such as new services that may be of interest to you.	<ul style="list-style-type: none"> • Legitimate interests 	Developing products, services, applications and designs that attract and retain customers.
Contact you to undertake customer satisfaction surveys, invite you to provide service reviews or for market research.	<ul style="list-style-type: none"> • Legitimate interests 	Developing products and services that attract and retain customers.
Maintaining network and data security	<ul style="list-style-type: none"> • Legitimate interests 	To maintain the security of our network this in turns helps us to maintain the safety and confidentiality of your information.
Logistics planning, demand forecasting, management information and research	<ul style="list-style-type: none"> • Legitimate interests 	We use information about collection habits, peak events and volumes, to help us to respond to demand, ensure the right services get to the right areas and to help us plan our operation.

Who we share your information with and why

Fresh Start works with a number of trusted suppliers, agencies and businesses in order to provide you the high quality services you expect from us. Some examples of the categories of third parties with whom we share your data are:

IT Companies

Fresh Start works with business who support our website and other business systems.

Payment processing

Fresh Start works with trusted third party payment processing providers in order to securely take and manage payments.

Credit Reference Agencies

When you apply for credit with us we will make searches about you with credit reference agencies. We do this to make sure customers who apply for credit accounts are able to manage the level of credit offered and not committing fraud by providing false or inaccurate information.

In order to process your application we will supply your personal information to credit reference agencies (CRA's) and they will give us information about you, such as your financial history. We do this to assess your creditworthiness and product suitability, check your identity, manage your account, trace, recover debts, and prevent criminal activity.

We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at

<http://www.experian.co.uk/crain/index.html>

We will use automated credit-scoring methods to assess your application and to confirm your identity. We will automatically check your credit history against our lending criteria and if you don't meet our requirements you will be declined for credit.

There is also an automated decision section below with further detail. Should you wish to object to the use of automated credit scoring, please contact the Data Protection Officer.

Debt recovery and fraud prevention services

Before we provide services, goods or financing to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity.

Details of the personal information that will be processed include, for example: name, address, contact details, financial information, employment status details..

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services you have requested.

We process your personal data on the basis that it is necessary in the public interest or in exercising official authority for us to prevent fraud and money laundering, and to verify identity, in order to protect ourselves and to comply with laws that apply to us.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

Automated Decisions

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if our processing reveals your behaviour to be consistent with money laundering or known fraudulent conduct, or is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision-making: if you want to know more please contact us using the details above.

Consequences of Processing

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services you have requested, or to employ you, or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies.

Data Transfers

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

Your Rights

Your personal data is protected by legal rights, which include your rights to object to our processing of your personal data; request that your personal data is erased or corrected; request access to your personal data.

For more information or to exercise your data protection rights, please contact us using the contact details above. You also have a right to complain to the Information Commissioner's Office, which regulates the processing of personal data.

Keeping in touch with you

We want to keep you up to date with information about new services, special offers and improvements to our operations. When you set your account up, we will ask you if you want to receive this type of marketing information.

If you decide you do not want to receive this marketing information you can request that we stop by writing to the Data Protection Officer at info@fswaste.co.uk, or by calling 0808 1781966

How long we keep your information

If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws.

We may need your personal information to establish, bring or defend legal claims. For this purpose, we will always retain your personal information for 7 years after the date it is no longer needed by us for any of the purposes listed under How we use your information above. The only exceptions to this are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law;
- we bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible; or
- in limited cases, existing or future law or a court or regulator requires us to keep your personal information for a longer or shorter period.

What are your rights

You are entitled to request the following from Fresh Start, these are called your Data Subject Rights and there is more information on these on the Information Commissioners website www.ico.org.uk

- Right of access –to request access to your personal information and information about how we process it
- Right to rectification –to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- Right to erasure (also known as the Right to be Forgotten) – to have your personal information erased. Contact 0808 178 1966
- Right to restriction of processing – to restrict processing of your personal information
- Right to data portability - to electronically move, copy or transfer your personal information in a standard form
- Right to object - to object to processing of your personal information
- Rights with regards to automated individual decision making, including profiling –rights relating to automated decision making, including profiling

If you have any general questions about your rights or want to exercise your rights please contact info@fswaste.co.uk

You have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner’s Office (ICO), the data protection regulator in the UK, are available on the ICO website www.ico.org.uk where your personal information has or is being used in a way that you believe does not comply with data, however, we encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have.

Contact

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or via info@fswaste.co.uk quoting Security and Privacy Enquiry.