

Fair Processing Notice – Guernsey Waste

Guernsey Waste (The Controller) is an asset of the States' Trading Supervisory Board (STSB) and a public authority run and maintained by the States of Guernsey and is the registered controller for all activities which are summarised within this notice. Guernsey Waste processes personal data in order to provide waste services under the following legislation:

- Environmental Pollution (Guernsey) Law, 2004 and the associated ordinances and regulations
- The Parochial Collection of Waste (Guernsey) Law, 2015, and the associated ordinances and regulations

Guernsey Waste's core mandated responsibilities include:

- To exercise powers and perform duties conferred on the Guernsey Waste by above listed Laws and Ordinances.
- Managing all contracts in relation to the processing and disposal of household and some commercial waste and recycling.
- Provision of household and commercial waste and recycling sites including the management of the operational contracts for these sites (Longue Hougue Waste Transfer Station, Longue Hougue Land Reclamation, Household Waste and Recycling Centre, Mont Cuet landfill site, historic landfill sites).
- Provision of household kerbside waste and recycling receptacles and pay as you throw stickers.
- The annual billing of the Waste Disposal Authority charge.
- Managing contracts in regard to the collection and disposal of end of life vehicles and bulky household items.
- Promotion and education around waste minimisation and waste management in Guernsey including the provision of a Real Nappy scheme.
- Undertaking operational activities on behalf of the Waste Disposal Authority (the STSB).

1. The Data Protection Law

Guernsey Waste acknowledges its obligations as per the data protection law, which provides a number of requirements in terms of processing activities involving personal data. We further acknowledge the general principles of processing as well as the rights of a data subject. Further information in relation to the principles of fair processing can be found within this fair processing notice. For more information about your rights as a Data Subject, please click [here](#) and/or visit www.gov.gg/dp

2. The Principles of Processing

a. Lawfulness, fairness and transparency

Personal data must be processed lawfully, fairly and in a transparent manner.

Guernsey Waste processes personal data for multiple purposes which are linked to the core responsibilities listed above.

Guernsey Waste collects the following personal data:

- Basic personal data relating to individuals such as name, address, date of birth, contact information;
- Images including photos and CCTV;
- Vehicle registration numbers;
- Financial data.

Guernsey Waste does not collect or process any special category data (the most sensitive of personal data under the Law).

The personal data that is listed above is collected and processed in order to discharge the responsibilities of Guernsey Waste. The lawful basis for collecting and processing each individual category of personal data is dependent upon the specific processing activity in question. The table (shown below) lists the operational processing functions of Guernsey Waste, the personal data that is required to fulfill each function and the lawful basis for the respective processing activities. The relevant condition/lawful basis varies according to the specific processing activity in each case, for a full list of conditions that the controller may rely upon please click [here](#).

Processing Activity	Personal data being processed	Lawful Basis for Processing
Removal of household waste (kerbside collections): Personal data is used to identify and set up data subject on system, arrange billing and take payments.	<u>Basic Personal Data:</u> Name, address, contact details (including email), financial data.	<u>Basic Personal Data</u> Schedule 2, Part 1, 2a: The processing is necessary for the conclusion or performance of a contract.

<p>Investigation of potential contraventions of Parochial Collection of Waste (Guernsey) Law, 2015:</p> <p>Guernsey Waste may obtain personal data from waste bags which have been illegally left out for collection without stickers.</p> <p>Data is obtained in order to identify and contact the owner of the waste bag.</p>	<p><u>Basic Personal Data:</u></p> <p>Name, address, contact details (including email),</p> <p>N.B. Further information (including all forms of Special Category Data) which has been thrown out with the data subject's waste may be seen by our contractors but we do not process this information.</p>	<p><u>Basic Personal Data:</u></p> <p>Schedule 2, Part 2, 8:</p> <p>The processing is necessary in order for the controller to exercise any right or power, or perform or comply with any duty, conferred or imposed on the controller by an enactment.</p> <p>Parochial Collection of Waste (Guernsey) Law, 2015</p>
<p>CCTV is in use at all Guernsey Waste sites for the purposes of crime prevention and public safety.</p> <p>Clear signage is in place in all areas with CCTV to alert data subjects to its use.</p>	<p><u>Basic Personal Data:</u></p> <p>CCTV images – no audio.</p>	<p><u>Basic Personal Data:</u></p> <p>Schedule 2, Part 2, 13(a):</p> <p>The processing is necessary for a law enforcement purpose.</p>
<p>Real Nappy Scheme:</p> <p>Guernsey Waste gives parents the opportunity to receive a one off payment to cover the cost of £35 of re-usable nappies per child.</p>	<p><u>Basic Personal Data:</u></p> <p>Name, contact details (including address, telephone and email address).</p>	<p><u>Basic Personal Data</u></p> <p>Schedule 2, Part 1, 2a:</p> <p>The processing is necessary for the conclusion or performance of a contract</p>
<p>Bulk refuse collection and disposal (including end of life vehicles):</p> <p>Guernsey residents can apply to Guernsey Waste to have bulk items and vehicles removed from their property for a fee.</p>	<p><u>Basic Personal Data:</u></p> <p>Name, contact details (including address, telephone and email address), financial information and vehicle registrations.</p>	<p><u>Basic Personal Data</u></p> <p>Schedule 2, Part 1, 2a:</p> <p>The processing is necessary for the conclusion or performance of a contract</p>

<p>Voucher or recycling receptacle requests, general correspondence, enquiries, missed kerbside collections and post logs (including complaints, compliments etc.)</p>	<p><u>Basic Personal Data:</u></p> <p>Name, contact details (including address, telephone and email address), financial information and vehicle registrations.</p>	<p><u>Basic Personal Data</u></p> <p>Schedule 2, Part 1, 2a:</p> <p>The processing is necessary for the conclusion or performance of a contract</p> <p style="text-align: center;">&</p> <p>Schedule 2, Part 1, 1:</p> <p>The data subject has requested or given consent to the processing of the personal data for the purpose for which it is processed.</p>
<p>Guernsey Waste “Womblers Scheme”</p> <p>We run a scheme for people who want to volunteer as “womblers” who choose to pick up rubbish from our beaches and public places in order to help keep the island clean. Participants in the scheme are given free bags and stickers for the waste they collect so they are not required to pay for its disposal.</p>	<p><u>Basic Personal Data:</u></p> <p>Name, contact details (telephone and email address – in some cases participants choose to give postal address)</p>	<p><u>Basic Personal Data</u></p> <p>Schedule 2, Part 1, 2a:</p> <p>The processing is necessary for the conclusion or performance of a contract</p>

No automated decision making will take place which involves the personal data of any data subject.

b. Purpose Limitation

Personal data must not be collected except for a specific, explicit and legitimate purpose and, once collected, must not be further processed in a manner incompatible with the purpose for which it was collected.

Guernsey Waste acknowledges its responsibility with regards to this data protection principle and therefore the controller maintains that it will not further process that personal data in a way which is incompatible to its original reason for processing as specified in section 2a, or unless the controller is required to do so by law.

Some of the systems we use to deliver our services involve the sharing of your data within the States of Guernsey. Contracts and strict agreements are in place to ensure that your information is kept safe and secure and that those departments are only using your data for the specific purpose of delivering the service we have requested. For more information on who we share your data with and how they use it, please contact us using the contact details provided in section (g).

c. Minimisation

Personal data processed must be adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed.

Guernsey Waste maintains that it will only process the personal data which is detailed in section 2a, and will not process any further personal data that is not necessary in relation to the original reason for processing personal data as specified in section 2a, unless the controller is required to do so by law.

d. Accuracy

Personal data processed must be accurate, kept up-to-date (where applicable) and reasonable steps must be taken to ensure that personal data that is inaccurate is erased or corrected without delay.

Guernsey Waste will endeavor to ensure that all personal data that it holds is accurate and kept up-to-date, and any personal data that is inaccurate will be erased or corrected without delay.

e. Storage limitation

Personal data must not be kept in a form that permits identification of a data subject for any longer than is necessary for the purpose for which it is processed.

When you provide personal data to Guernsey Waste for the fulfillment of a contract, that data will be retained for as long as that contract is being upheld. Any other Personal data held by Guernsey Waste will be retained in accordance with the States of Guernsey Records

Management Policy and the States of Guernsey retention and Disposal Schedule, together with any service area specific schedules and policies.

Social Media platforms: Guernsey Waste occasionally engages with customers via Facebook and Twitter. Users of these platforms sign up to these at their own risk and any information they provide on these sites is the property of the site owner, not Guernsey Waste. Whilst we regularly delete messages which contain personal data, we have no control over what the social media platforms do with your data.

f. Integrity and confidentiality

Personal data must be processed in a manner that ensures its appropriate security, including protecting it against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Guernsey Waste maintains to process all personal data with appropriate levels of security. In order to prevent unauthorised or unlawful processing of the personal data, Guernsey Waste has put in place suitable physical, electronic and managerial procedures to safeguard and secure the information that is collected.

Information Access – access to electronic or paper records is tightly controlled. Employees are vetted in a manner commensurate with the role that they are expected to undertake. Protocols are followed to ensure that employees only have access to areas and documents as required to undertake their role. Access is monitored and effectively managed.

Information Security – the Committee adopts the information security standards of the States of Guernsey.

g. Accountability

The controller is responsible for, and must be able to demonstrate, compliance with the data protection principles.

The contact details of the controller are as follows:

Guernsey Waste, La Hure Mare, Vale, Guernsey GY3 5UD

Tel: 01481 221234

Email: recycle@gov.gg

The contact details for the Data Protection Officer of the States Trading Supervisory Board are as follows:

Data Protection Officer, States Trading Supervisory Board

Tel: 01481 717000

Email: data.protection@gov.gg