

## Introduction

### PRIVACY POLICY

This privacy policy sets out how North London Waste Authority (NLWA) uses and protects your personal data. This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

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#### 1. Important information and who we are

##### Privacy policy

This privacy policy gives you information about how NLWA collects and uses your personal data.

##### Controller

NLWA is the controller and responsible for your personal data (referred to as "North London Waste Authority", "NLWA", "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise

your legal rights (paragraph 10), please contact the DPO using the information set out in the contact details section (paragraph 11).

## 2. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, marital name, any previous names, username or similar identifier, marital status, title, date of birth, sex and gender.
- **Contact Data** includes postal address, delivery address, email address and telephone numbers.
- **Financial Data** includes [bank account and payment card details].
- **Transaction Data** includes details about payments to and from you and other details of products and services provided to us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access the NLWA website.
- **Usage Data** includes information about how you interact with and use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Employment History and Qualifications Data** includes information relating to your professional background and capabilities. This may comprise academic and professional qualifications, previous and current employment details, job titles, responsibilities, dates of employment, relevant skills, training records, certifications, and other experience relevant to your role or career development. This data is used to assess suitability for roles, support workforce planning, and comply with legal and regulatory obligations.
- **AI Interaction Data** refers to the information collected when you engage with our AI Enquiries Assistant/chatbot. This includes the content of your submitted enquiries, the assistant's generated responses, and associated metadata such as timestamps, session identifiers, interaction duration, and technical logs. This data may be used to monitor system performance, improve service quality, support internal analytics, and ensure compliance with applicable policies.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

### 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - subscribe to service updates, newsletters, or publications;
  - request service reminders, alerts, or marketing communications;
  - participate in a consultation, community engagement event, promotion, or survey;
  - enter a competition, promotion or survey; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy <https://www.nlwa.gov.uk/cookies> for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
  - Technical Data is collected from the following parties:
    - analytics providers such as Google based outside the UK;
    - advertising networks inside OR outside the UK; and
    - search information providers inside OR outside the UK.
  - Contact, Financial and Transaction Data is collected from providers of technical, payment and delivery services inside OR outside the UK.
  - Identity and Contact Data is collected from data brokers or aggregators inside OR outside the UK.
  - Identity and Contact Data is collected from publicly available sources such as Companies House and the Electoral Register based inside the UK.
- We are required by law to protect the public funds we administer. We may use the information you provide to us for the prevention and detection of crime. We may also share this information with other bodies that are responsible for auditing or administering public funds including the Department for Work and Pensions, other local authorities, HM Revenue and Customs, and the Police.

The Authority uses data matching as a way of processing large volumes of information. While this can be a useful way of detecting fraud, it also enables us to identify information that is inaccurate or out of date, helping us comply with Data Protection law, while improving service provision.

As part of the Authority's fraud prevention and detection activities, the Authority participates in the National Fraud Initiative (NFI). The data matching exercise is run by the Cabinet Office.

#### 4. How we collect Special Category Data

We will only collect your Special Category Data in the limited circumstances set out below and only with your explicit consent. Special Category Data includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, health, trade union membership or genetic data. It also includes biometric data where it is collected for the purpose of uniquely identifying a natural person. The Special Category Data we collect and the circumstances we collect the data are:

- We record your ethnicity when you apply for our Nappy Voucher Scheme.
- We take photographs of individuals at our events, which may be Special Category Data.
- We only collect information about criminal convictions and offences in order to carry out a check with the Disclosure and Barring Service for the purpose of employment for a position which requires staff to be checked with the Disclosure and Barring Service.

#### 5. How we use your personal data

##### Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Public task:** We need to process your information to comply with the law.
- **Performance of a contract with you:** as a provider or purchaser of goods/works/services under a contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Where processing is necessary for purposes of legitimate interests pursued by the business or a third party, except where such interests are overridden by the interests, rights, or freedoms of the data subject.

- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to and to share information with other public authorities. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.
- **Vital interest:** We need to process your information to protect someone's life in an emergency.

Where we require consent to use your information we will make it clear when we ask you for consent and also explain how you can withdraw your consent.

You will be advised of any additional purposes or uses at the time the information is collected or used.

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

<b>Purpose/Use</b>	<b>Type of data</b>	<b>Legal basis [and retention period]</b>
To carry out NLWA's obligations under any contract between us and you	(a) Identity (b) Contact	Performance of a contract with you  We will retain this data for no more than 12 (twelve) years after the contract has been terminated, expired or otherwise ended.
To send to NLWA's constituent borough councils on a need to know basis or as a result of a request e.g. if you ask us at an event to pass on your contact details to one of the North London boroughs in order to access services	(a) Identity (b) Contact	(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose
To use photograph(s) of you to promote waste reduction, reuse and recycling and to enable our partners such as NLWA's constituent boroughs) to do so as well	(a) Identity (b) Contact (c) Special Category Data	(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose
To order or process any orders including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)  We will retain this data for no longer than necessary and no more than 6 (six) years. [state retention period]
To process your compost delivery requests	(a) Identity (b) Contact	(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose
To issue recycling third party credits to you	(a) Identity (b) Contact	(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose

To carry out consultations required by law	(a) Identity (b) Contact	(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose  (b) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Profile (d) Marketing Communications and	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)  (d) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law  (e) Consent: the individual has given clear consent for you to process their personal data for a specific purpose  We will retain this data for no longer than necessary and no more than 6 (six) years.
To process grant applications you make to us or our appointed contractor	(a) Identity (b) Contact	(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose  (b) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law  (c) Performance of a contract with you  (d) Necessary to comply with a legal obligation  (e) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)
To receive and process real nappy voucher applications you	(a) Identity (b) Contact	(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose

make to us or our appointed contractor	(c) Special Category Data	(b) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law  (c) Performance of a contract with you
To identify users of our Reuse and Recycling Centres (RRCs) to prevent unauthorised entry to the RRCs	(a) Identity	(a) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing Communications and	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)  We will retain this data for no longer than necessary and no more than 3 (three) years.
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation  We will retain this data for no longer than necessary and no more than three (3) years.
To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)  We will retain this data for no longer than necessary and no more than three (3) years.
To carry out market research through your voluntary participation in surveys	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to study how customers use our

	(d) Usage (e) Marketing and Communications	products/services and to help us improve and develop our products and services). We will retain this data for no longer than necessary and no more than three (3) years.
To respond to your enquiries about our services and provide information using our AI Enquiries Assistant, and to monitor and improve the performance, accuracy, and safety of the assistant.	(a) Identity (b) Contact (c) Technical (d) Usage	(a) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law

## **Direct marketing**

You may receive marketing communications from us if you have requested information from us or in respect of a contract/provision of services from us and you have not opted out of receiving the marketing.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

## **Third-party marketing**

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

## **Opting out of marketing**

You can ask to stop sending you marketing communications at any time or by contacting us.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example relating to order confirmations for or checking that your contact details are correct.

## **Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. We do not store any personal information in cookies. For detailed information on the cookies we use and the purposes for which we use them see our Cookies Policy at <https://www.nlwa.gov.uk/cookies>.

We do not make any attempt to find out the identities of those visiting any of our websites, namely nlwa.gov.uk or northlondonheatandpower.london. This privacy notice applies to all our websites. Our sites may, from time to time, contain links to and from the websites of our constituent boroughs or related organisations. We do not control these third-party websites and are not responsible for their privacy statements or policies. If you follow a link to any of these websites, please note that these websites have

their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **General**

The Authority both collects and uses personal data for the delivery and fulfilment of a range of services and operations. In order to maintain these systems or to ensure contractual obligations, the Authority sometimes needs to share personal data.

The Authority may need to share resident information to other people and organisations that provide a service on the Authority's behalf. These providers are obliged to keep personal data and resident's details securely and use them only to fulfil their agreed duties and responsibilities.

The Authority may disclose information to other partners of the Authority where it is necessary, either to comply with a contractual or legal obligation, or where permitted in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulations, for example where the disclosure is necessary for the purposes of the prevention and/or detection of crime, or when the Authority needs to disclose information to prevent risk or harm to an individual.

## **6. Disclosures of your personal data**

We may share your personal data where necessary with the parties set out below for the purposes set out in the table **Purposes for which we will use your personal data** above.

In addition, NLWA may information as part of its statutory obligations process the following information including but not limited to:

- Prevention of fraud including participating in the National Fraud Initiative;
- Safeguarding of vulnerable adults and children;
- Protect you or other individuals from serious harm;
- Prevention and detection of crime;
- Protect public funds;
- Assessment of any tax or duty;
- Public safety and law enforcement;
- If required to do so by any court or law;
- National security;
- Internal and external Third Parties;
- Specific third parties such as Department for Work and Pensions, other local authorities, HM Revenue and Customs, and the Police;
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire or set up other organisations. If a change happens to our business, then the new body may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and

only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **Recipients of personal data**

NLWA may share personal data following limited circumstances:

- To our service providers and professional advisers to deliver our contracts for the performance of our public functions or to meet a legal obligation. Any information provided to our service providers or professional advisers is subject to strict contractual confidentiality obligations;
- AI Service Provider: To provide the AI Enquiries Assistant service, we share AI Interaction Data with our technology partner, who acts as a data processor on our behalf. They are contractually bound by a Data Processing Agreement to process this data only on our instructions and to implement robust security measures to protect it. Their processing is for the sole purpose of operating and maintaining the assistant.
- To our constituent borough councils and only on a need to know basis or as a result of a request from you, in order to perform our statutory functions or to meet a legal obligation or so that you can access a borough provided service. For example, we may pass on your contact details with your consent if you attend our event for which you will be eligible to receive local green points or credits from the borough for attendance. We also have contractual arrangements with some of our constituent boroughs which are explained below.
- NLWA is part of the London Borough of Haringey's IT network. London Borough of Haringey provides all our IT and system administration services. Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used.
- NLWA staff are employed by the London Borough of Camden. Where appeals in relation to complaints are made to the London Borough of Camden, personal information held by NLWA in relation to the complaint may be shared with Camden's Central Complaints Unit.

Details on NLWA and our relationship with our constituent boroughs can be found [in this link](#).

- To regulators and other authorities acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances.
- To other public bodies to comply with any applicable law, regulation, code of practice or enforceable government guidance. Please see our National Fraud Initiative Statement below showing when we share personal data with other public bodies to prevent or detect fraud.
- We require all recipients of personal data from us to respect the security of your personal data and to treat it in accordance with the law. When our service providers are processing your personal data on our behalf, we do not allow service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **NLWA National Fraud Initiative Statement**

NLWA is required by law to protect the public funds it administers. We may share information provided to us with other bodies responsible for auditing or administering public funds, or where undertaking a

public function, or order to prevent and detect fraud. The Cabinet Office is responsible for carrying out data matching exercises.

Data matching involves comparing computer records held by one body against other computer records held by the same or another body to see how far they match. This is usually personal information. Computerised data matching allows potentially fraudulent claims and payments to be identified. Where a match is found it may indicate that there is an inconsistency requiring further investigation. No assumption can be made as to whether there is fraud, error or other explanation until an investigation is carried out.

Working with our constituent borough councils we participate in the National Fraud Initiative: a data matching exercise to assist in the prevention and detection of fraud. We are required to provide particular sets of data to the Minister for the Cabinet Office for each matching exercise as detailed [in this link](#).

The use of data by the Cabinet Office in a data matching exercise is carried out under Part 6 of the Local Audit and Accountability Act 2014. Data matching by the Cabinet Office is subject to a [Code of Practice](#).

Further information on the Cabinet Office's legal powers and reasons why it matches particular information can be found [in this link](#).

## **7. International transfers**

We share your personal data within any of the Authority owned companies such as LondonEnergy Ltd.

Whenever we transfer your personal data out of the UK to countries which have laws that do not provide the same level of data protection as the UK law, we always ensure that a similar degree of protection is afforded to it by ensuring that the following safeguards are implemented:

We use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement, or The International Data Transfer Addendum to the European Commission's standard contractual clauses for international data transfers.

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data, namely, General Data Protection Regulation (GDPR).

We may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement or The International Data Transfer Addendum to the European Commission's standard contractual clauses for

international data transfers. To obtain a copy of these contractual safeguards, please contact us at the link to Contact details (paragraph 11).

## 8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 9. Data retention

### How long will you use my personal data for?

Personal Data Category	Description / Comments	Retention Policy
Website "Contact Us" Forms	—	Delete every 12–18 months
AI Enquiries Assistant Interaction Data	Includes user queries, AI responses, and associated metadata	Delete every 12–18 months
Newsletter Subscription / Request Forms	—	Delete after 3 years or immediately upon unsubscribe request
Photos and Photo Permissions	Photos depicting sensitive personal data (e.g. racial/ethnic origin, religious beliefs, health) must be treated as sensitive	Review quarterly; retain no longer than 3 years as per permission terms
Personal Data Collection Forms, Competition Entries, Prize Winners, Pledge Forms, Attendance & Feedback Forms	Used to collect personal data at events or for campaigns/projects	Review post-campaign/project; retain max 3 years unless externally required longer
Complaints and Petitions	Includes correspondence and registers; may be needed for legal proceedings	Review annually; destroy after 7 years unless legal claim arises
Meeting Minutes	Includes attendee lists, tasks, and personal info	Retention varies by meeting type: <ul style="list-style-type: none"><li>• Authority meetings: Indefinitely</li><li>• Litigation: 6–12 years post-claim</li><li>• Projects: Refer to general policy</li><li>• Internal: Review annually</li></ul>
Emails	—	Auto-deleted after 7 years per London Borough of Haringey policy
General Correspondence	—	Review annually; destroy after 7 years unless needed longer
Service User Details (e.g. Credit Schemes, Grants)	Includes compost delivery, charity shop registration, Community Fund applications, etc.	Review at end of service/use; anonymize for statistical retention
General Registers & Logs	—	Review annually and at scheme end

Information from Third Parties	Shared with NLWA for specific purposes	Review annually and at project end; return or securely dispose per owner's choice
Procurement Documents	Includes CVs and contact details of bidders	Retain for 3 years post-contract award; then destroy
Consultation Documents & Consultee Details	E.g. planning application responses	Review post-consultation; retain until legal challenge limitation period ends
Communications with NLHPP Stakeholders, Planning Inspectorate, BEIS	Includes minutes and saved emails	Review annually; retain for 7 years unless legally required otherwise
Operational Records	E.g. van booking system, waste movement data	Review every 2 years

Furthermore, we will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for at least six years.

In some circumstances you can ask us to delete your data: see paragraph 10 below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 10. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local

law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object. Note, however, that this right is not absolute and we may not always be able to comply with your request to stop processing if (i) we have compelling legitimate grounds for the processing, which override your rights and freedoms or (ii) the processing is for the establishment, exercise or defence of legal claims. We will communicate our reasons to you, if applicable, at the time of your request.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see **OPTING OUT OF MARKETING** in paragraph 5 for details of how to object to receiving direct marketing communications).
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in section 4 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
  - If you want us to establish the data's accuracy;
  - Where our use of the data is unlawful but you do not want us to erase it;
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Note, however, that this right is not absolute and we may not always be able to comply with your request to restrict processing for specific legal reasons which will be notified to you, if applicable, at the time of your request.

If you wish to exercise any of the rights set out above, please contact us (see **Contact details** (paragraph 11)).

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure

that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **11. Contact details**

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact our DPO in the following ways:

- Email address: [Abdul.Elghedafi@NLWA.gov.uk](mailto:Abdul.Elghedafi@NLWA.gov.uk)
- Postal address: North London Waste Authority, 1B Berol House, 25 Ashley Road, Tottenham Hale, London, N17 9LJ

## **12. Complaints**

You have the right to make a complaint to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). However, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand. You can find our complaints form here: <https://www.nlwa.gov.uk/article/complaints-procedure>

## **13. Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. This version was last updated on 19<sup>th</sup> November 2025.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

## **14. Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.