

Privacy Notice for Nottingham Recycles App



**Nottingham City Council
Information Compliance**

Service Area: Domestic Waste & Recycling
Directorate: Communities, Environment and Resident Services
PN-0351

01/2024

The **Domestic Waste & Recycling Team** are in the Waste and Cleansing service at Nottingham City Council ("the council"). The council will use the information provided by residents ("users") living in the city of Nottingham only for the purpose of the administration relating to the Nottingham Recycles App provided by ReCollect Systems Inc. ("ReCollect"). The basis under which the council uses personal data for this purpose is on consent, provided on a voluntary basis. When we process personal information relating to you, we will only do so when it is necessary and where we have a lawful reason to do so.

Nottingham Recycles App is an online and app-based recycling education tool and calendar for users to sign-up to for educational purposes. The council has procured this software to provide residents access to a number of tools relating to their household waste collections. Upon registering with the software, the tool will give users access to:

- information regarding the correct recycling of materials for their property
- an interactive game to test their recycling knowledge
- a calendar of bin collection days for their property
- email reminders and/or push notifications relating to household waste collections, including informing users of changes to collection days due to emergencies or unplanned events

The aim of using Nottingham Recycles App is to increase recycling and reduce contamination from residents living in the city of Nottingham. ReCollect will act as a processor of information on behalf of the council and will use an Application Programming Interface (API) to access bin collection days from the services' Bartec

system, which will be matched to addresses to provide accurate and current bin day information. The Bartec system, which is provided by Bartec Municipal Technologies, uses information such as street name and property number; no personal information is collected from Bartec and no personal information is shared between ReCollect and Bartec.

What personal information will the council process?

When we process your personal information, we will comply with data protection legislation and enable you to exercise your rights contained within the legislation.

The information that the council collects about you to fulfil the services outlined above will relate to your property and when/how you access the tool. The data collected from you will be the minimal amount to provide this service, which includes:

- Street address, including postcode
- Phone number, email address or twitter username depending on notification method selected by the user
- IP Address
- Content viewed (URL)
- Time that content is accessed
- Type of browser
- Device type (computer/smartphone/tablet) and operating system (Windows, iOS, Android) with version information, a unique identifier and crash data only when a defect occurs
- Cookies are collected, and can be disabled

Lawful basis for processing

The basis under which we use your personal information for these purposes is consent, provided on a voluntary basis. We collect your personal information under the following data protection laws:

- The UK General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- Human Rights Act 1998

What purpose will my personal information be for?

ReCollect will provide the council with a dashboard which will allow them to view personal information and review the success of the online tool / smartphone application. This includes (but is not limited to):

- Sending reminders to users and viewing/editing reminders

- Viewing metrics such as the number of reminders set up, how they've been set up (email or application notification) and the total number of properties which have reminders to improve engagement with the service
- The location of users and content viewed to shape future engagement opportunities and improve communication to residents in certain areas

Will my personal information be shared with other organisations?

Only the council's Domestic Waste and Recycling Team will access the personal information you provide. It will be restricted from use by other departments within the council.

Information will only be shared with other organisations who have a lawful purpose for processing. In this instance, information will be shared with ReCollect who provide the web-based tool and smartphone application. Personal information will not be shared with any other organisation.

ReCollect conduct annual security audits with a third-party auditor who is certified by Information Systems Audit and Control Association (ISACA) as a Certified Information Systems Auditor, certified in Risk and Information Systems Controls (CRISC), and Certified in the Governance of Enterprise IT (CGEIT).

Personal information will be stored on the ReCollect secure servers in line with their privacy policy, which can be found online at <https://policy.recollect.net/privacy>, which outlines how the information is collected, used, retained, shared, transferred, accessed and updated/deleted in line with the General Data Protection Regulation (GDPR).

Do I have to provide the information?

You are not obliged by statute or contract to provide the information that is specified within this notice. Not providing this information means that you as a user will not be able to use the online/app-based tool as it requires the above information to function.

How long will the council retain the data for?

The information that a user provides will only be retained for as long as they continue to access waste services from NCC or until they unsubscribe from service/app, in line with ReCollect's privacy notice.

ReCollect only keeps personal information for as long as it is needed to provide Services. Information about how users use their services is recorded in ReCollect's logs, which are automatically deleted after 30 days. Securely encrypted backups, which are only accessible by a limited number of ReCollect's staff, remain in existence

for 30 days. Except where they are required to retain users' information for legal reasons, personal information will be permanently deleted no more than 90 days after:

- a reported problem or feedback issue has been resolved
- users' cancel a notification or other on-going service for which personal information was collected; and
- a one-time service such as a scheduled collection or drop-off of items such as bulky waste or yard waste has been completed.

Users can request to unsubscribe from the tool / application or turn off reminders; all personal information will be removed within 30 days.

The Council publish an Information Asset Register (IAR), this will outline the retention periods for the personal data we process. You can find this IAR on our website <https://geoserver.nottinghamcity.gov.uk/information-asset-register/>

Information Rights

The UK General Data Protection Regulation provides for the following rights as prescribed by the legislation:

- A right to request a copy of your information
- A right to request rectification of inaccurate personal data
- A right to request erasure of your data known as 'the right to be forgotten'
- A right to in certain circumstances to request restriction of processing
- A right in certain circumstances to request portability of your data to another provider
- A right to object to processing of data in certain circumstances
- A right regarding automated decision-making including profiling

However, Nottingham City Council can restrict the above rights in certain circumstances for example to avoid obstructing an investigation, avoid prejudicing the prevention, detection, investigation or prosecution of criminal penalties or to protect the rights and freedoms of others.

Data Protection Officer

The Data Protection Officer is Naomi Matthews. You can contact the data protection officer at:

Loxley House,
Station Street,
Nottingham,
NG2 3NG

or at data.protectionofficer@nottinghamcity.gov.uk .

Information Commissioner's Office

The Information Commissioner's Office (ICO) website provides guidance on data protection and privacy matters, you can visit the website at www.ico.org.uk. You also have the right to complain to the ICO if you consider that the Council have processed your personal data incorrectly or that we have breached our obligations to you. You can contact the ICO at:

Wycliffe House,
Water Lane
Wilmslow,
Cheshire
SK95AF

www.ico.org.uk

Further Information

For more information about these rights please refer to our detailed privacy statement at <https://www.nottinghamcity.gov.uk/privacy-statement> .