KWD RECYCLING

DATA PROTECTION POLICY

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Document Owner	KWD Recycling		

1. About This Data Protection Policy

This Data Protection Policy explains how KWD Recycling collects, uses, stores, protects and shares personal data in connection with its business activities, including its interactions with customers, website visitors and other members of the public. KWD Recycling is committed to handling personal data responsibly and in accordance with applicable data protection legislation, including the General Data Protection Regulation (GDPR) and relevant Irish data protection law. This policy also explains the rights individuals have in relation to their personal data and how they can contact KWD Recycling with questions or concerns about its use of personal data.

2. Personal Data We May Collect

Depending on how you interact with KWD Recycling, we may collect and use personal data such as:

- contact details, such as your name, address, email address and telephone number;
- information you provide when requesting a service, making an enquiry, submitting feedback or making a complaint;
- customer, service, collection, account, billing and payment-related records, where applicable;
- information relevant to investigating a missed collection, service dispute, incident or complaint;
- communications you send to us and our responses;
- images captured by vehicle camera systems, which may include people, vehicles, registration numbers and properties near our vehicles; and
- technical information generated when you visit our website, such as information collected through server logs, cookies or similar technologies, where these are used.

We ask that you do not provide personal data that is unnecessary for your enquiry or service request.

3. How We Use Personal Data

We may use personal data where necessary to:

- provide and manage waste management, waste collection and recycling services;
- respond to enquiries, requests, feedback and complaints;
- manage customer accounts, service arrangements, invoicing and records;
- investigate alleged missed collections, service disputes and other incidents;
- investigate road traffic accidents or incidents involving our vehicles;
- protect our vehicles, equipment, property and the safety of people where appropriate;
- manage insurance claims, legal claims and proceedings where necessary; and
- meet legal, regulatory and other applicable obligations.

We will not use personal data for a purpose incompatible with the purpose for which it was collected unless permitted by applicable law.

4. Our Lawful Bases for Processing

Data protection law requires KWD Recycling to have a lawful basis for processing personal data. Depending on the circumstances, this may be necessary to perform a contract or take steps at your request before entering into a contract, comply with a legal obligation, pursue legitimate interests where those interests are not overridden by your rights, or rely on another lawful basis permitted by law.

Where we rely on consent, we will request it where required and explain how it may be withdrawn. The lawful basis used will depend on the particular processing activity.

5. Vehicle Camera Systems

KWD Recycling operates video camera systems on its waste collection vehicles and vans. These vehicle cameras do not record audio.

The cameras are used for legitimate operational, safety and security purposes, which may include:

- investigating road traffic accidents and incidents involving our vehicles;
- investigating complaints about our waste collection services, including allegations that a bin or collection has been missed;
- protecting vehicles, equipment and property;
- investigating incidents involving members of the public;
- supporting insurance claims and legal proceedings where necessary; and
- providing relevant footage to An Garda Síochána, insurers, legal advisers or other authorised bodies where necessary and lawful.

Footage may capture images of members of the public, vehicles and registration numbers, properties and other objects near our vehicles. We will use footage only for specified and legitimate purposes, restrict access to authorised persons and apply appropriate security measures.

Footage will be kept only for as long as necessary for its purpose. Where it is required for an accident, complaint, claim, investigation or legal matter, it may be retained for as long as reasonably necessary for that matter, subject to applicable law. Requests for footage will be assessed individually, including the need to protect the rights and privacy of other people appearing in it.

Where appropriate, information about vehicle camera use will also be made available through notices or signage and other privacy information.

6. Who We May Share Personal Data With

We do not disclose personal data to third parties unless there is a lawful basis for doing so. Where necessary and appropriate, we may share relevant information with:

- An Garda Síochána or other competent authorities;
- insurers and insurance representatives;
- legal advisers;
- regulatory or statutory bodies;
- service providers who support our business or website; and
- other parties where disclosure is required or permitted by law.

We limit disclosures to what is necessary for the relevant purpose and use appropriate safeguards where required.

7. How Long We Keep Personal Data

We retain personal data only for as long as necessary for the purposes for which it was collected, taking account of the type of information, the reason for processing and any applicable legal, regulatory, accounting, insurance or claims-related requirements.

Retention periods may differ by record type. KWD Recycling should maintain and follow an appropriate retention schedule. Information relevant to an ongoing complaint, accident, insurance claim, investigation or legal matter may be retained for as long as reasonably necessary to deal with that matter.

8. How We Protect Personal Data

KWD Recycling uses appropriate technical and organisational measures designed to protect personal data against unauthorised access, disclosure, alteration, loss or destruction. Access is limited to people and service providers who need the information for legitimate purposes and are subject to appropriate confidentiality and security requirements.

If a personal data breach occurs, we will assess it and take action in accordance with applicable law. We will notify the Data Protection Commission within the legally required timeframe where notification is required, and inform affected individuals where the law requires us to do so.

9. Your Data Protection Rights

Subject to the circumstances and conditions set out in applicable law, you may have the right to:

- request access to personal data we hold about you;
- request correction of inaccurate or incomplete personal data;
- request erasure of personal data where the legal conditions are met;
- request restriction of processing where the legal conditions are met;
- object to certain processing;
- request data portability where that right applies; and
- withdraw consent where processing is based on consent.

To exercise a right, contact us using the details in Section 12. We may need to verify your identity and obtain enough information to locate the relevant records. Some rights are subject to exceptions or limitations under data protection law.

If your request relates to vehicle camera footage, please provide details that may help us identify it, such as the date, approximate time, location and relevant vehicle or incident information. We may need to protect the privacy and rights of other people captured in the footage.

10. Complaints

If you have a question or concern about how KWD Recycling handles your personal data, please contact us first using the details below. You also have the right to lodge a complaint with the Irish Data Protection Commission if you believe your personal data has been processed in breach of applicable data protection law.

11. Contact KWD Recycling

Email: info@kwd.ie
Telephone: 064 663 5666

KWD Recycling will review this Data Protection Policy periodically and update it when necessary to reflect changes in our services, data processing practices, technology or legal requirements.