



RECYCLING & WASTE MANAGEMENT

BRAMFORD ROAD, GREAT BLAKENHAM, IPSWICH IP6 0SL. TEL: +44 (0)1473 830948 FAX: +44 (0)1473 830056
E-mail: enquiries@boltonbros.co.uk Website: www.boltonbros.co.uk

Data Protection Policy 2018

1. What is the purpose of this document?
 - 1.1 This privacy notice describes how Bolton Brothers Limited ("Bolton Bros. Ltd"/ "we") collect use and protect personal information about you, as well as providing you with certain other information relevant to your personal information.
2. What personal information may We hold about you and how is it collected?
 - 2.1 We may hold your personal information because
 - (a) You supplied it to us;
 - (b) We learned it from someone else, either in the context of providing waste management services to our clients or in the context of our business more generally;
 - (c) Of the use of cookies; or
 - (d) It is publicly available.
 - 2.2 The personal information we hold about you will generally consist of the categories of data set out below but may from time to time include other information such as information the law requires us to collect in relation to clients.
 - 2.3 We will generally ask you for the following information:
 - (a) Contact details (such as name, address, telephone number and email address)
 - (b) Date of birth
 - (c) Gender
 - (d) Identification information such as a passport or photo-driving licence
 - (e) Proof of address information such as a utility bill or bank statement
 - 2.4 If you apply for a job with us, we will hold and process personal information relevant to recruitment which may include CVs, interview notes, information relating to your right to work and any other pre-employment checks. We collect this personal information either directly from you or employment agencies. We might also collect publicly available information or qualification information as well as information from any referee you may nominate.
 - 2.5 Bolton Bros. Ltd is the data controller in respect of the information set out above. Whilst you have no obligation to provide us with your personal information, if you do not provide information we request we may not be able to deal further with you or progress your application if the data relates to recruitment.



is the trading style of Bolton Brothers Ltd
incorporated in England & Wales No. 3745354



3. How do We use your Personal Information?

3.1 We will use your personal information:

- (a) To provide our services;
- (b) To run our business, including internal record keeping;
- (c) To comply with our legal obligations
- (d) In terms of recruitment, to ensure that we recruit employees who have the appropriate skills, qualifications, experience and suitability for the role for which they are applying as well as to ensure candidates have the right to work in the UK. We may also process health information in order to comply with our duty to make reasonable adjustments.

4. Data Sharing

4.1 We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

5. Grounds for Processing

5.1 The legal basis on which we hold your personal information is primarily for the purpose of pursuing our legitimate interests as a business which provides waste management services.

5.2 We may also process your personal information in order to perform any contract we have entered into with you or to comply with our own legal obligations.

5.3 If we process your data on the basis of your consent to do so, we will let you know and provide you with the ability to withdraw such consent.

5.4 The legal basis for processing your personal information relating to recruitment is because it is necessary for our legitimate interests in running our business or to comply with our legal obligations.

6. Transferring information outside the EEA

6.1 We will not normally transfer your personal data outside the European Economic Area however there may be occasions where this might be necessary. In such an instance we will tell you about the transfer and:

- (a) Ensure the party to whom we transfer the data is situated in a country which has been confirmed by the European Commission to provide adequate protection to personal information; or
- (b) Ensure the party has agreed by way of contract to protect your personal information as required by legislation; or
- (c) Ensure the transfer is permitted by law.

7. How Long will We keep your Information?

7.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

- 7.2 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 requirements.
- 7.3 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.
8. Your rights in connection with Personal Information
- 8.1 Data protection legislation gives you the below rights in relation to the personal information we hold about you:
- (a) Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
 - (b) Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
 - (c) Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
 - (d) Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
 - (e) Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
 - (f) Request the transfer of your personal information to another party.
 - (g) you can complain to the UK regulator, the Information Commissioner's Office at www.ico.org.uk if you think that we aren't complying with our obligations regarding your personal information.
- 8.2 If you want to exercise any of the rights listed above, or if you have any queries in relation to your personal information please contact Jodi Bolton-Smith who is the person at Bolton Brothers Limited responsible for how we process personal information, at jodi@boltonbros.co.uk.