



GDPR_004

VWS Privacy Notice_Full

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1	27.09.18	1 st Issue.	CD	AJ	TJ
Rev	Date	Revision Description	By	CHK	APP

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Privacy Notice

This privacy notice explains how VWS (UK) Ltd trading as Veolia Water Technologies (VWT) and ElgaLabWater (ELW) collects, stores, manages and protects your personal data. It outlines the types of data that we hold and how we use them.

The company takes its responsibilities around the correct collection, use and destruction of the personal data of its various audiences and stakeholders very seriously and is committed to openness and fairness in the handling of personal data.

We aim to be clear when we collect information about you and not do anything you wouldn't reasonably expect.

VWT is the Data Controller as defined by the Data Protection Act 2018 and all applicable laws which replace or amend it, including the General Data Protection Regulation. As the Data Controller, VWT will collect and process your personal data.

Who We Are

VWT & ELW specialise in a wide range of technologies, products and services for water and wastewater treatment, resource recovery and energy generation.

The company's registered address is:

VWS (UK) Ltd
Windsor Court
Kingsmead Business Park
High Wycombe
HP11 1JU
U.K. registration No. 00327847

For more information on VWT go to our website:

<https://www.veoliawatertechnologies.co.uk>

What Information Do We Collect About You?

VWT collects and processes personal data to support all of the aims of the company. We may collect and process your information to enable the company to provide our products and services, manage contracts, projects and maintain effective oversight, and to keep you up to date with our news and services. Personal data you provide when registering for our products and services, responding to questionnaires or surveys, or contacting customer service may also be held.

We may collect some or all of the following information about you:

- Name, title and gender.
- Business contact details including business address, work email, work phone number and links to social media accounts.
- Postal address.
- Where using the online shop or ordering over the phone we may capture credit card or bank details.
- Information collected automatically. Your IP address and non-identifying information about your use of our website may be collected automatically using tracking technologies, such as cookies. Your website browser software can be set to reject all cookies; however, cookies can allow you to take advantage of some of the site's essential features, which may not work if you reject cookies.
- Information collected from other sources. We may combine information about you from Veolia sites, information collected offline or from external parties.

How Do We Collect The Data?

The majority of information we process is obtained directly from you and organisations you work for.

We may also:

- Collect information from publicly available sources to keep your information up to date. We will also obtain your information when we use cookies on our websites (see below).
- Obtain your personal data through your use of social media depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this.

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Cookies & Other Tracking Technologies

When you visit our websites, we use cookies to automatically collect information about how you use our sites. These technologies help us remember your preferences and allow us to bring you the content and features that are likely to be of greatest interest to you. To learn more about cookies and other tracking technologies, including how to disable them, please visit <http://www.allaboutcookies.org/>. Please note that some cookies are essential to the functioning of our Sites and deleting or disabling them will reduce the site’s functionality.

IP Address - We may record the Internet Protocol (“IP”) address of your computer or other electronic device when you visit the VWT website. An IP address identifies the electronic device you use to access the sites, which allows us to maintain communication with your computer as you move about VWT sites and to customise content.

How Will We Use Your Information?

We use the information you give us to:

- Fulfil contracts you have entered into with the company.
- Provide the services you have engaged the firm to do.
- Send you the publications, newsletters and product updates.
- Provide you with the services and the information about our activities and events that you have requested.
- Administer any user accounts we set up for you.
- Conduct surveys and process your response to any survey you participate in for research, evaluation and statistical purposes.
- Communicate with you regarding our aims and activities.
- Take all reasonable care to ensure that we do not send unwanted information to you when you have informed us that you do not wish to be contacted.
- Keep your data up to date.
- Implement any instructions you give us with regard to withdrawing consent to send marketing information or informing us through the VWT preference service that you do not wish to receive any marketing information.
- Use IP addresses to identify the location of users, to block disruptive use and to establish the number of visits from different countries.
- Maintain internal record keeping so as to keep a record of your relationship with us.

Legal Basis for Processing

Under European data protection laws, VWT must have a legal basis to process your personal data. The legal basis that applies in an instance will depend on for which of the specific purposes described above VWT is processing your personal data:

- In certain cases, VWT may ask for your consent to collect and process your personal data. Should you choose to provide your consent, you may later withdraw your consent by contacting us as described in section ‘How to control what we send you or request we update your personal information’. Please note that the withdrawal of consent will not affect processing which has already occurred.
- In other instances, the processing of your personal data may be necessary in order to comply with an applicable law or regulation or for the performance of a contract to which you are subject. You may not be able to opt-out of this processing, or your choice to opt-out may impact our ability to perform a contractual obligation otherwise owed to you.

Legal Basis for Processing /Cont.

- In some instances, VWT may process your personal data based on our legitimate interests, for example in communicating with you about our products and services. You have the right to request to opt-out of all such processing of your personal data.
- Where the company relies on legitimate interests we have balanced our interests with your rights.

Marketing

You may also receive marketing information from VWT, such as offers regarding related products or services, invitations to participate in surveys about our products, or notifications about special promotions. In such cases, we will use your contact and other personal data to send you marketing information.

When And What Do We Communicate

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VWT will only contact you for marketing purposes, for example to keep you up to date on our products and services and to provide you with technical or market information, where we have your consent or we are otherwise allowed to do so by law. We will make it easy for you to tell us if you would like to receive communications from us and hear more about VWT.

We will not send you marketing material or communications if you tell us that you do not wish to receive it. There are a variety of ways you can do this and these are detailed below.

You can update or withdraw your consent at any time.

Other Circumstances In Which You May Receive Communications

"Soft Opt In"

This allows organisations to send communications by email to individuals, who we have an existing relationship with, and where we have identified that we have a legitimate interest in continuing to communicate with VWT, provided those individuals are given the opportunity to Opt Out at the time of initial communication or engagement.

How To Control What We Send You or Request We Update Your Personal Information?

The accuracy of your information is really important to us. We want to ensure that we are able to communicate with you in ways that you are happy with, and to provide you with information that is of interest.

If you wish to change how we communicate with you, update the information we hold or your preferences, then please contact us:

Email us at vwsuk.gdpr@veolia.com

Write to us at:

VWS (UK) Ltd
Windsor Court
Kingsmead Business Park
High Wycombe
HP11 1JU
Telephone: 0203 567 7400

Additionally, you can opt out of marketing emails at any time by clicking the unsubscribe link in any marketing email from VWT.

How Long Will It Take For These Changes To Be Effective?

We endeavour to make updates to the marketing preference within 72 hours of receiving your communication.

Who Do We Share Your Information With And Why?

VWT will only use the information within the company for the purposes for which it was obtained. We will not under any circumstances, share or sell your data with any third party for their own purposes, and you will not receive marketing from any other companies, charities or organisations as a result of giving your details to us.

We may share your information in the following circumstance:

- You may be provided with online advertisements of VWT products and services on third-party websites and mobile services that are tailored to you, for example, on the basis of information that you provide to VWT or a third-party website you are visiting, or of your browsing activity, purchases, or interests.
- We have relationships with suppliers and affiliated companies, who help us operate our business and for whom it may be necessary to have access to your personal data in the course of providing services to VWT. We will not authorise these parties to use your personal data for any purpose that is not related to VWT. We require them to handle your personal data collected in accordance with this privacy notice.
- These "Data Processors" will only act under our instruction and are subject to contractual obligations containing strict data protection clauses. We do not allow these organisations to use your data for their own purposes or to disclose it to other third parties without our consent and we will take all reasonable care to ensure that they keep your data secure.
- We will share your information if we are required to by law (for example to law enforcement agencies for the prevention or detection of crime, subject to such bodies providing us with a relevant request in writing).

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Where Do We Keep Your Data?

VWT maintains all your data within the UK.

How Long Do We Keep Your Data?

We will hold your personal data in our systems for as long as is necessary for the relevant activity and as required by law and regulation. These purposes are laid out in the section "How we will use your information". All data is kept in accordance with our company data retention schedule.

If you request that we stop sending you marketing materials we will keep a record of your contact details to enable us to comply with your request not to be contacted.

How Do We Protect Your Data?

We will take all reasonable care to ensure that there are appropriate technical controls and operational measures in place to protect your personal data.

We have appropriate technical controls in place to protect your personal data:

- Our network is protected behind firewalls
- Antivirus and Malware software is deployed
- All systems are password protected
- Our network is monitored by security specialists
- Network protection is formally tested
- Mobile and removable devices are encrypted

We have appropriate operational measures in place to protect your personal data:

- We undertake regular reviews of who has access to information that we hold to see that your information is only accessible by appropriately trained staff and contractors.
- Where we use external companies to collect or process personal data on our behalf, we do comprehensive checks on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they collect on our behalf, or have access to.
- We have a robust audit framework in place to see that internal and external measures and obligations are in place and being maintained.

Your Rights Relating To Your Personal Data

There are specific rights enshrined in law that you have around your data. These rights are:

- Informed – you have the right to be informed about what data we hold and for what purpose
- Access – you have the right to have access to your personal data
- Rectification – you have the right to have your personal data corrected or removed if it is inaccurate
- Erasure – you have the right to have your personal data deleted from our systems
- Restriction – you have the right to restrict the processing of your personal data
- Objection – you have the right to object to the processing of your personal data for communications and marketing
- Portability – you have the right to have your personal data transferred
- Withdraw consent – where you have provided consent to process your personal data you have the right to withdraw that consent at any time
- Complain – you have the right to complain to the regulator and/or seek judicial remedy if your data has not been treated in accordance with the law

We will respond to you within one month of receiving a request related to anyone of the above rights unless the number and complexity of the requests made is deemed sufficiently high in which case we may extend this time by a further two months. We will inform you if we need to make use of this additional time and why we need to do so.

We will not charge you for responding to any of these requests unless it can be demonstrated that you are making an excessive number of repetitive requests or that your request is not based on fact or realistic considerations. In such exceptional cases we may charge you a reasonable fee or choose to refuse your request.

If you disagree with our approach you may raise your concerns with the Information Commissioner's Office (ICO)

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<https://ico.org.uk/concerns/>.

To assist us in responding to these requests, we may ask you to verify your identity to make sure we:

- Do not give your personal data to the wrong person
- Do not update your data with details you did not provide
- Do not take action you did not request

Right To Be Informed

VWT has published this privacy notice along with additional notices when we collect personal data from you to explain what personal data we collect and process. We aim to be as open and transparent as possible about how we use your personal data.

Right Of Access

You have the right to request a copy of the personal information that we hold about you. See section 'How To Contact Us Or Raise A Concern Or Complaint'.

The ICO provides additional information on how to request your data. See section 'Contacting The Information Commissioner's Office'.

Right Of Rectification

It is important to us that the information we hold about you is accurate and up to date. See section 'How To Contact Us Or Raise A Concern Or Complaint'.

Right Of Erasure

This is sometimes referred to as the "Right to be forgotten". You can request that we delete your personal data from our systems if you

- Believe the data is no longer necessary for the purpose for which it was collected
- Withdraw your consent (subject to the requirement for us to retain data to process your request)
- Believe we have processed your data unlawfully
- Believe we should delete your data to comply with other laws or regulation
- We may choose to refuse your request if we believe:
 - We have a legal obligation to keep your data
 - It is required for the legitimate interests and purposes of VWT
 - It is required for the establishment, exercise or defence of legal claims

To request the erasure of your data see section 'How To Contact Us Or Raise A Concern Or Complaint'.

Right Of Restriction

You have the right to ask the firm to restrict how we process your data. This provides for a temporary halt to processing your data. You may make the request if you believe that:

- We should not process your data whilst we are in discussions with you regarding a disagreement over the accuracy of your personal data
- We have processed your data in a manner you believe to be unlawful but rather than asking for the erasure of the data you would prefer another course of action to rectify your issue
- We no longer require the data but you do not wish us to dispose of it as you require it to establish or defend a legal claim

If such as restriction is put in place we shall limit the processing of your data to storage with the following exceptions:

- Where the processing is for the establishment, exercise or defence of legal claims
- We must process it to protect the rights of another person

To request the restriction of processing of your data please see section 'How To Contact Us Or Raise A Concern Or Complaint'.

Right of Objection

You have the right to object to the processing of your personal data.

If your data is being used for direct marketing purposes you have the right at any time to stop us from contacting you as outlined in this notice.

If we are processing your data for research or statistical purposes or processing your data based on our legitimate interests you may seek to object to the processing of your personal data.

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We may reject your request:

- Where we are processing data for research and statistical purposes where there is a public interest in the continued processing of the data.
- Where we believe we have compelling legitimate grounds for continuing to process your data which outweighs any harm or damage to you through the continued processing of the data.
- Where the processing is for the establishment, exercise or defence of legal claims.

To object to the processing of your data please see section 'How To Contact Us Or Raise A Concern Or Complaint'.

Right Of Portability

VWT must allow you to obtain and reuse your personal data for your own purposes. This applies to personal data you have provided to us and is processed in our computer systems. You can request that we provide you with a copy of this data in a format that can be read by another person's or organisation's computer system.

You have the right to transfer that copy of your data to another organisation or request that we do it for you where it is technically feasible for us to do so.

This right of transfer can be refused where we feel it may adversely affect the rights of another person.

To request the transfer of your data please see section How To Contact Us Or Raise A Concern Or Complaint.

Right To Withdraw Consent

Where we rely on your consent for the processing of your data you have the right to change your mind and withdraw your consent at any time. If you withdraw your consent we must stop processing your data.

To withdraw your consent for processing please see section 'How To Contact Us Or Raise A Concern Or Complaint'.

Right to Complain

You have a right to complain to the Information Commissioner's Office (ICO) if:

- We do not take action on your request within one month of receipt and do not provide you with reasons why.
- You believe that the way we are processing your data is not in keeping with the requirements of the law.
- You believe your rights have been infringed because of the way we have processed your data.

Please see the section 'How To Contact Us Or Raise A Concern Or Complaint'.

Contacting The Information Commissioner's Office

If you have wider concerns about how VWT manages information or wish to make a complaint please contact the Information Commissioner's Office (ICO). The ICO can be contacted at:

<https://ico.org.uk/global/contact-us/>.

Changes to Our Privacy Policy

We will only use personal data in the manner described in this privacy policy in effect when the information was collected from you or as authorised by you. However, and subject to any applicable consent requirements, we reserve the right to change the terms of this privacy policy at any time. Any changes to this privacy policy will be reflected on this page with a new effective date. VWT encourages you to review this privacy policy regularly for any changes. Any personal data collected will be handled in accordance with the currently-posted privacy policy.

How To Contact Us Or Raise A Concern Or Complaint

If you have any concerns about how your personal data is being collected and processed, or wish to exercise any of your rights detailed in this privacy notice please contact:

The Data Privacy Officer
VWS (UK) Ltd
Windsor Court
Kingsmead Business Park
High Wycombe
HP11 1JU

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Email: vwsuk.gdpr@veolia.com

Telephone: 0203 567 7400

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