

# Bristol Water Fisheries

## Privacy Policy

### Bristol Water Recreations and Fisheries Privacy Notice

This Privacy Notice is designed to explain how we collect and use our recreations and fisheries customers' personal data. Bristol Water plc (Bristol Water) is committed to protecting our customers' data, uphold their data rights, and meet their expectations for handling personal data.

We are a registered data controller, registration number: Z5277208. This means it is our responsibility to maintain and protect all personal data that we collect and ensure that anyone we share personal data with will also adequately protect that data.

The Notice is designed to be easy to use and understand, if you have any concerns or would like more detail please follow the instructions under 'Contact Us'.

### **Personal data we collect**

We will always endeavour to make clear why we are collecting your personal data at the time.

### **Information you give us**

We will collect your personal data whenever you fill in a form, contact us (including by social media), pay us, request a service, provide feedback, or enter a competition or survey.

Information you provide us may include:

- **Account and card details** – account number and sort code, account holders name, direct debit details
- **Contact details** – postal address, email address, mobile or landline numbers
- **Personal details** – name, date of birth

### **Information we collect**

We may record phone calls, incoming and out-going made by our customer-facing teams.

We may collect car registration details of visitors to our public sites when they use the car parks.

We have CCTV and security cameras across our sites, including body cameras. In addition, our staff may photograph individuals where there are concerns of illegal or dangerous activities. These images may be shared with enforcement bodies (including the police) and local community groups for the purposes of enforcement and engagement.

Whenever you visit our website we use cookies that will contain personal information, for more detail please see the 'Web cookies' section.

### Information provided by other sources

We occasionally use analytics providers in order to get a better understanding of our customers' lifestyle. This assists us in understanding our customers, tailoring our services, and providing relevant information. Where possible, this will be aggregated, pseudonymised, or anonymised data.

### Purpose for collecting your personal data

We will only collect data where we have a clear and legal basis to do so. The table below explains each legal basis we use, with a more detailed description of the purpose alongside it:

Legal Basis	Purpose
Legal Obligation	<ul style="list-style-type: none"><li>• Enforcement of our byelaws</li><li>• Assist other enforcement bodies (such as the Environment Agency or the Police)</li></ul>
Legitimate Interests	<ul style="list-style-type: none"><li>• Administer a customer's account, including bookings, billing, requests, enquiries, and complaints</li><li>• Provide recreational services and products, such as fishing and bird watching permits and supplies</li><li>• Issue car parking passes</li><li>• Contact you about leisure and recreational activities available at our lakes</li><li>• Make goodwill, bond, and compensation payments</li></ul>

	<ul style="list-style-type: none"> <li>· Carry out and analyse customer surveys</li> <li>· Use aggregated data to understand customer trends, and to assist in business planning</li> <li>· Comply with any regulatory obligations we may have</li> <li>· Maintain our land holdings and sites</li> <li>· Keep our records accurate and up-to-date</li> <li>· Carry out credit checks (for more information see the ‘Credit checks’ section)</li> <li>· Prevent and detect crime, including fraud</li> </ul>
<b>Consent</b>	<ul style="list-style-type: none"> <li>· Subscribers can receive a free catch report</li> <li>· Promotional photography</li> </ul>

These purposes may be executed by us or one of our third party service providers.

### Who we share personal data with

We are required to share personal data with multiple parties for legal, regulatory, and operational purposes.

We will not sell your data to be used for marketing purposes.

### Service providers

<b>Name / Category of Service Provider</b>	<b>Purpose</b>
<b>Wipro Limited</b>	<b>Our IT services provider. They have access to all our systems and data</b>

<b>Angling Trust Limited</b>	<b>Our partner in certain events, such as our family fun day.</b>
<b>Lakeside businesses (including Lakeside Optics, Woodford Lodge, and Salt &amp; Malt)</b>	<b>Maintain records of any car park enforcement</b>
<b>Social Media Platforms</b>	<b>Responding to enquiries and complaints</b>
<b>Customer Survey and Feedback Services</b>	<b>Carry out and analyse surveys and feedback results</b>
<b>Security Contractors</b>	<b>Safety and security at our sites</b>
<b>Debt recovery companies</b>	
<b>Insurance providers</b>	<b>Managing litigation and compensation claims</b>
<b>Auditors</b>	<b>Provide assurance for business processes and decisions</b>
<b>External Legal and Professional Advisors</b>	<b>Obtaining legal advice, managing disputes, and compensation claims</b>
<b>Clubmate</b>	<b>Provides an online booking platform for permits.</b>

### **Legal and regulatory authorities**

To comply with our legal or regulatory obligations we may provide personal data to the following authorities:

- Defra
- Environment Agency
- Environmental Health Authorities

- Local Authorities
- Police, Fire, Ambulance, and other emergency services

We may also be required to share personal information if required to do so under court order.

### Transfers outside of the European Economic Area

Currently, we only uses one data processor based outside of the EEA. Wipro Limited has personnel based in India and may process our held data in India. A strict data processing agreement is in place to ensure both we and Wipro follow all data protection law as applicable in the UK.

Cubmate use a data processor called Stripe, which is based in the US. They operate under a data processing regime that offers the same level of protection as a UK based company.

### How long will we retain data for?

We have a data retention policy. Data will be retained as long as it serves a useful and legitimate purpose and taking into account all legal and regulatory obligations.

The following general principles have been applied, although there may be exceptions to these principles:

- Customer data – 6 years
- Regulatory information – relevant business planning period (maximum 5 years), or 10 years for formal regulatory submissions
- Financial information – 7 years
- Any information that may be relevant to existing or future legal proceedings – 6 years

### Direct marketing

We want to keep our customers informed of events and activities taking place at our lakes. We use a number of methods, including direct marketing on occasion. We may engage a third party to provide this service on our behalf.

We will never sell your data to third party marketing companies.

### Automated decision making and profiling

We do not currently conduct any automated decision making, including profiling, as defined by data protection legislation.

### Web cookies

Our website uses cookies to store small amounts of data on visitors' computers and devices. Cookies are typically used to improve functionality and relevancy of information.

The following cookies are used on our website:

Name	Purpose
<b>PHPSESSID</b>	<b>Session cookie used to establish a user session. It is used on a temporary basis and disappears when the session is closed.</b>
<b>catAccCookies</b>	<b>Used to record whether use of cookies has been accepted.</b>
<b>wp-settings-[number]</b>	<b>WordPress Cookie. The number on the end is your individual user ID from the users database table. This is used to customise your view of admin interface, and possibly also the main site interface.</b>
<b>wp-settings-time-[number]</b>	<b>WordPress Cookie. The number on the end is your individual user ID from the users database table. This is used to customise your view of admin interface, and possibly also the main site interface.</b>

Browser settings can be used to block and remove cookies. For more information please contact your internet browser provider.

## Data subject rights

We recognise customer rights under data protection legislation:

- **Right to be Informed** – customers are entitled to know how their data is processed. This notice is designed to provide an overview of all processing activity. If more specific detail is required please contact us by the details provided below.
- **Right to Access** – customers can access their data via a Subject Access Request, to make a request fill in the form at <https://www.bristolwater.co.uk/subject-access-request/>

- **Right to Rectification** – if customer data is found to be inaccurate we are under an obligation to correct it. This may be done by contacting Customer Services by the details provided below.
- **Right to Erasure** – customers have the right to be forgotten. Personal data shall be deleted where there is no longer a legitimate purpose to the data processing.
- **Right to Restriction on Processing** – We have processes in place to restrict processing where there is a legitimate objection.
- **Right to Data Portability** – Where applicable, we have processes in place to allow data portability to another data controller.
- **Right to Object** – if a customer objects to the processing of their data under legitimate interests they have the right to raise an objection, which will be appropriately considered by us.
- **Right to not be subject to automated decision making** – customers have the right to have automated decision making to be reviewed by our personnel. We do not use automated decision making at the moment and will inform customers if our policy changes here.

### Contact Us

If you have any questions in relation to this notice please get in contact.

<b>Bristol Water Fisheries</b>		<b>Data Protection Officer</b>
<b>Woodford Lodge</b> Chew Stoke Bristol BS40 8XH		<b>Bristol Water plc</b> Bridgwater Road Bristol BS13 7AT
<b>woodford.lodge@bristolwater.co.uk</b>		<b>dataprotection@bristolwater.co.uk</b>
<b>01275 332 339</b>	<b>Or</b>	<b>0117 934 1108</b>

### Complaints

If you have any complaints in relation to this notice or our use of customer data you may contact us at the above address.

Customers are reminded they have the right to object to the processing of their data that relies on the legal basis of legitimate interests, including (but not limited to) legitimate business interests, marketing, profiling, or research. All requests will be evaluated on a case-by-case basis.

Alternatively you can complain to the Information Commissioner's Office at [ico.org.uk](https://ico.org.uk) or call their helpline on 0303 123 1113.

### **Updating this Policy**

We may change this notice from time to time. We encourage all customers to periodically check this policy on our website to ensure they are aware of the most recent version.

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