

## Privacy Policy and Notice

### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our customers and all data associated with them.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our customers; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website. Where applicable, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4 Our website and business operations incorporate privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information.
- 1.5 In this policy, "we", "us" and "our" refer to Environmental Concern Ltd.

### 2. Credit

- 2.1 This document was created by Environmental Concern Ltd's administrative department.

### 3. How we use your personal data

- 3.1 We may process data regarding your use of our waste management and logistical services. The data may include the following: your name, your company name, your contact email address, your/your company's contact numbers, your IP address, and any geographical location(s) associated with you/your company. The source of this data is through any waste management or logistical service enquiries through our website or emailing system. This data may be processed for the purposes of conducting waste management operations, logistical services, communicating with you, ensuring the security of our data handling, complying with legislation and regulations specific to the waste industry, and the analysis of the use of our website and services. The legal basis for this processing is consent OR our legitimate interests, namely the carrying out of above mentioned services offered by Environmental Concern Ltd.
- 3.2 We may process information that you post for publication on our website or through our services. The publication data may be processed for the purposes of enabling such publication and administering our website and services.
- 3.3 We may process information relating to transactions, including purchases of goods and services, which you enter into with us. The transaction data may include your contact details, your card/bank account details and the transaction details. The transaction data may be processed for the purpose of

supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our business operations.

- 3.4 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.5 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.6 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 3.7 Please do not supply any other person's personal data to us, unless we prompt you to do so.

#### **4. Providing your personal data to others**

- 4.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- 4.2 We may disclose your personal data to our insurers and/or professional advisers as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.3 Financial transactions relating to our services are/may be handled by our payment services providers. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.
- 4.4 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We

may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## **5. International transfers of your personal data**

- 5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 5.2 We, and our other group companies, may have offices and facilities in abroad. The European Commission has made an "adequacy decision" with respect to the data protection laws of most countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission or the use of binding corporate rules.
- 5.3 You acknowledge that personal data that you submit for publication through our website, email system or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## **6. Retaining and deleting personal data**

- 6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 We will retain your personal data as follows:
  - (a) All data provided for the provision of Environmental Concern Ltd's day-to-day business operations will be retained for a minimum period of 5 years following the initial point of contact made to Environmental Concern Ltd, and for a maximum period of 10 years following this date.
- 6.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:
  - (a) The period of retention of your data will be determined based on the specific service(s) that you require from Environmental Concern Ltd and the associated legislative/regulatory requirements of aforementioned service(s).
- 6.5 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **7. Amendments**

7.1 We may update this policy from time to time. When this occurs, this will be communicated to you.

## **8. Your rights**

8.1 In this Section 8, we have summarised the rights that you have under the new General Data Protection Regulation (GDPR). Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

8.2 Your principal rights under data protection law are:

- (a) the right to access
- (b) the right to rectification
- (c) the right to erasure
- (d) the right to restrict processing
- (e) the right to object to processing
- (f) the right to data portability
- (g) the right to complain to a supervisory authority
- (h) the right to withdraw consent.

8.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

8.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

8.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

- 8.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 8.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 8.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 8.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 8.10 To the extent that the legal basis for our processing of your personal data is:
- (a) consent
  - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract
- and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 8.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

8.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

8.13 You may exercise any of your rights in relation to your personal data by written notice to us.

## **9. About cookies**

9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

9.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **10. Cookies that we use**

10.1 We use cookies for the following purposes:

- (a) authentication - we (may) use cookies to identify you when you visit our website and as you navigate our website
- (b) status - we (may) use cookies to help us to determine if you are logged into our website
- (c) personalisation - we (may) use cookies to store information about your preferences and to personalise the website for you
- (d) security - we (may) use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally
- (e) advertising - we (may) use cookies to help us to display advertisements that will be relevant to you
- (f) analysis – we (may) use cookies to help us to analyse the use and performance of our website and services
- (g) cookie consent - we (may) use cookies to store your preferences in relation to the use of cookies more generally

## **11. Cookies used by our service providers**

- 11.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 11.2 We (may) use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>

## **12. Managing cookies**

- 12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
  - (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
  - (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
  - (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
  - (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
  - (e) <https://support.apple.com/kb/PH21411> (Safari); and
  - (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

- 12.2 Blocking all cookies will have a negative impact upon the usability of many websites.
- 12.3 If you block cookies, you will not be able to use all the features on our website.

## **13. Our details**

- 13.1 This website is owned and operated by Environmental Concern Ltd.
- 13.2 We are registered in England and Wales under registration number 2292114, and our registered office is at James Stanley and Co., 1733 Coventry Road, South Yardley, Birmingham, B26 1DT.
- 13.3 Our principal place of business is at 52 Alma Crescent, Duddeston, Nechells, Birmingham, B7 4RH.
- 13.4 You can contact us:
  - (a) by post, to the postal address given above (52 Alma Crescent)
  - (b) by telephone number on 0121 333 3155

(c) by email, using [sales@environmentalconcern.co.uk](mailto:sales@environmentalconcern.co.uk)

#### **14. Data protection officer**

14.1 Due to our company size and status, we are not legal required to allocate/employ a data protection officers. However, more information regarding data collection, this privacy policy/notice, and GDPR can be obtained from our administrative office: 0121 333 3155 (option 2).