

Waste Efficiency Limited Privacy Policy

Waste Efficiency Limited is committed to protecting your personal information. It's your information, it's personal, and we respect that. We also want to maintain the trust and confidence of every one of our employees, those who purchase our products and services, as well as each visitor who uses the Waste Efficiency website.

This policy gives you detailed information on when and why we collect your personal information, how we use it and how we keep it secure.

We may change this policy from time to time in accordance with changes at Waste Efficiency Limited or to reflect changes to regulation or legislation. Please check this page regularly to ensure that you're happy with any changes. By using our website and sharing personal information with us you are agreeing to be bound by this policy.

Please contact us if you have any questions about this privacy policy, to execute your rights (please see Section 13 below) or to see the information we hold about you. Please contact our Compliance Team at enquiries@wasteefficiency.co.uk or write to:

Data Controller
Waste Efficiency Limited
1 Shire Business Park
Wainwright Road
Worcester
WR4 9FA

1. Who are we?

We are Waste Efficiency Limited, a private limited company incorporated and registered in England & Wales (Company number 04961733). The registered office address is 1 Shire Business Park, Wainwright Road, Worcester WR4 9FA.

2. How do we collect information from you?

We only collect personal data that you want to provide to us or that is needed to provide (and improve) our service to you. For example, we collect your information:

- A. when you provide it to us directly by filling in the Email us form on Waste Efficiency's website, or when you correspond with us by phone, email or otherwise;
- B. when you register for a new account with us to become a supplier or customer, purchase our products and services;

Some website functionality or service may be unavailable to users who do not provide their data, or who do not consent to the use of cookies and similar technologies on this site.

3. What information do we collect about you?

We only collect the information that's necessary to carry out our business, provide the service you've requested and to keep you informed.

- **Customer Data** that includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address, email address, phone number, contact details and purchase details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions.

Our lawful ground 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.

- **User Data** that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back-ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.
- **Supplier Data** that includes data relating to any purchases of goods and/or services such as your name, title, billing address, email address, phone number, contact details and purchase details. We process this data to record the goods and/or services you have supplied and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us, and/or taking steps to enter into such a contract for the delivery of services.

You are not required to provide us with all of the Personal Data listed above, but if you do not provide the data we have marked as essential, we may not be able to effectively provide you with our products, services and information.

We may also collect other information with regard to each of your visits to our website, which includes products and services, IP address, and information regarding what pages are accessed and when.

Our website, which has a URL starting <https://>, is a secure website. We do not store any financial information relating to bank, debit or credit card details, on our website.

4. **How we use the information we collect?**

We use this information:

- A. to manage your account with us and personalise your use of the website;
- B. to respond to your requests and inquiries;
- C. to process your order or request for our products or services;
- D. to process payments, accounting and administration;
- E. to carry out our obligations arising from any contracts entered by you and us (for example, if you have purchased any product or service with us) or where we are required to do this by law or other regulations.;
- F. to notify you of changes to our services and policies;
- G. to manage reporting and business planning - we produce internal documents to monitor our own activities.

The legal basis for the processing of your personal data is your consent and/or any other applicable legal basis, such as our legitimate interest in engaging in commerce and offering products and services of value to you; where such processing is necessary to perform our contract with you or to take steps before entering into our contract with you; and/or where such processing is necessary to comply with our legal obligations, resolve disputes and enforce our contractual agreements;

Please note that, any consent you provide may be withdrawn at any time by following the contact methods listed in Section 13 and 14 below.

5. Where do we store your data?

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

6. How long do we retain your data?

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations.

We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us or to comply with any relevant legal reasons. We may choose to delete your data and any related Waste Efficiency account at any time without notice to you should we determine that we do not need to retain your data any longer.

7. Disclosure of your information?

We will not sell or rent your information to any third parties.

We will not share your information with any third parties for marketing purposes.

We only disclose information to third parties or individuals who process your information on our behalf or when obliged to do so by law. We require that our third-party service providers only use your Personal Data as necessary to provide the requested services to us and each service provider is subject to a set of terms consistent with this Privacy Policy. We also ensure that the third party provides appropriate security measures to protect your Personal Data and strictly monitor compliance with such security measures for the lifetime of our contractual relationship with the third party. The purpose of sharing your information with third parties includes, but is not limited to, the following:

- A. Hosting providers for the secure storage and transmission of your data;
- B. Regulatory bodies such as the Environment Agency;
- C. Payment solution providers for the secure processing of payments you provide to us;
- D. Technology providers who assist in the development and management of our website and its functionality;
- E. Legal and compliance consultants, such as external counsel, external auditors, or tax consultants;
- F. Legal and/or statutory authorities and agencies, to enforce or apply our Terms & Conditions or if we believe that we need to do so to protect and defend the rights or property or safety of Waste Efficiency, our websites or the personal safety of our employees or visitors and for other lawful purposes;

8. How we protect your personal information?

We use reasonable measures to strive to safeguard and secure the personal data we collect. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including: -

- restricted access to information;
- IT authentication;
- Firewalls and anti-virus/malware.

Our internal policies and controls ensure that your data is not misused or disclosed and all personal data, in whatever format, is stored/disposed of securely and confidentially.

Our security practices, processes or technology do not guarantee absolute security of your information and you should take all normal personal precautions such as, but not limited to, not sharing passwords, closing browsers, and not using public networks (e.g., internet cafes, etc.).

9. Profiling

We may use the information you provide to us and which we obtain from other sources to analyse your personal information and create a profile of your interests and preferences so that we can contact you with products, services and information which you might be most interested in. We may make use of additional information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and reduce fraud and credit risks. This practice is called “profiling”, which involves making automated decisions about you based on this information in order to better enable us to tailor our interactions with you to make them more relevant and interesting. You may object to such profiling at any time by contacting us (see Your Rights below Section 13).

10. Use of 'cookies'

Like many other websites, Waste Efficiency’s website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual.

It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website.

12. Children’s privacy

We do not knowingly process any information of children aged 16 or under.

13. Your rights

You have the right to ask Waste Efficiency to provide you with all the information it stores on you. You have the right to ask Waste Efficiency to rectify, block, complete and delete your personal data and to restrict its use. You have the right to request additional information about the handling of your personal data. You also have the right to object to the processing of your data by Waste Efficiency in some circumstances and, where we have asked for consent to process your data, to withdraw this consent. Additionally, you may contact our Compliance team at enquiries@wasteefficiency.co.uk if you would like assistance with any of the aforementioned rights.

There are exceptions to these rights, however. For example, access to personal data may be denied in some circumstances if making the information available would reveal personal information about another person or if Waste Efficiency is legally prevented from disclosing such information. In addition, where Waste Efficiency can demonstrate that it has a legal

requirement to process or keep your data, Waste Efficiency may be able to retain the data even if you withdraw your consent.

Any excessive access request may be subject to a fee to meet our costs in providing you with details of the information we hold about you.

14. Complaint to our supervisory authority

If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Controller on the above address or e-mail enquiries@wasteefficiency.co.uk , who will investigate the matter. If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the Information Commissioner's Office (ICO) <https://ico.org.uk>

This policy was last reviewed: June 2019