PRIVACY NOTICE

1. INTRODUCTION

- 1.1 We take privacy and the protection of personal information seriously. This Privacy Notice sets out details about how we gather, use and share personal information and about individual privacy rights. How we use personal information depends upon the context in which it is made available to us. For further information on how ECOVEND is impacted by GDPR please read our statement GDPR Privacy Statement.
- 1.2 This Privacy Notice provides up to date information about how we use personal information and will update any previous information we have published about using personal information. We may make minor updates to this Privacy Notice from time to time, however if we make any material changes to the manner in which we process and use your personal information, we will announce this clearly on our website.

2. ABOUT US

- 2.1 We are what is known as the "controller" of the personal information which we gather and use for EcoVend. When we say "we" or "us" in this Privacy Notice, we mean Ecovend.
- 3. WHAT KINDS OF PERSONAL INFORMATION WE USE
- 3.1 We use a variety of personal information depending on the circumstances under which personal information is made available to us.
- 3.2 We may use personal information in the following circumstances:
- (a) Business Contacts: We hold the names, job titles, employer details and professional contact details for various business contacts, including client contacts, supplier contacts and interested parties.

(b) Clients:

- Waste Equipment and Collection Services: Most of our clients are incorporated entities, however in the course of supplying services, we may collect and use personal information of individuals that work for our clients. This can include names, contact details and information about an individual's work or role at our client; and
 - (c) Job Applicants: Where you may apply for a role with us, we will process the personal information you provide to us as part of your application and any interview selection process. This will ordinarily include your name, personal contact details, professional history, education and qualifications and references. We may also collect and use some special categories of personal data about job applicants, such as information about an applicant's racial or ethnic origin and some health information regarding any medical conditions or disabilities.
 - 4. HOW WE GATHER YOUR PERSONAL INFORMATION
 - 4.1 We only use personal information which we have obtained directly for the purposes described in this Privacy Notice.
 - 4.2 Personal Information is gathered via forms on our website, or in the course of business-as-usual correspondence with business contacts;
 - 5. WHY WE USE PERSONAL INFORMATION
 - 5.1 We will use personal information for the following purposes:

- (a) Business Contacts: We process the personal information of our business contacts as necessary for the legitimate interests of managing the day-to-day operation of our business, including correspondence, engaging suppliers, and promoting our services to business contacts;
- (b) Clients: We process the personal information of individuals that work for our incorporated clients in the course of providing waste management services.
- (c) Job Applicants: We process the personal information of job applicants for the legitimate interests of determining whether or not to employ a particular individual for a role in our organisation. Where we decide to employ a job applicant, we process their personal information for the purposes of entering into and performing our employment contract with the applicant. We process racial and ethnic origin and health information of job applicants for the purposes of meeting our legal obligations under employment and similar laws.
- 5.2 If we are not provided with access to personal information for the purposes outlined in this paragraph 5, we may not be able to offer or provide certain services, or we may not be able to complete consultant or job applications.

6. HOW LONG WE KEEP PERSONAL INFORMATION

- 6.1 We will never retain personal information for any longer than is necessary for the purposes we need to use it for.
- 6.2 Generally, in respect of personal information gathered in the context of a contract, we will retain personal information for the duration of the contract and a period of up to six years after the contract has expired or terminated, in case such personal information is required for the exercise or defence of any legal insurance claim during this period.
- 6.3 We may also retain personal information for as long as required by law or regulation or instruction of a relevant accreditation body.
- 6.4 Unsuccessful job applicant information is retained for a period of 12 months after the position has been filled.
- 6.5 We will retain the personal information of business contacts who require access to our client portal until such time as there are no longer any active contracts or the individual no longer requires access.

7. SHARING PERSONAL INFORMATION WITH THIRD PARTIES.

- 7.1 We only share personal information with third parties:
- (a) to the extent necessary for fulfilling the purposes outlined in paragraph 5, including where necessary for the provision of services;
- (b) where we are under a legal or contractual obligation to do so; or
- (c) where is it fair and reasonable for us to do so in the circumstances.
- 7.2 We may share personal information with the following third parties:
- (a) Suppliers: We use a number of different suppliers with whom we share personal information so that these suppliers can process services on our behalf. In these circumstances, we take steps required by data protection laws to ensure that these suppliers protect the personal information we share with them;

- (b) Accreditation Bodies: We may be required to share personal information with accreditation and regulatory bodies who monitor that we are compliant with their rules and requirements
- (c) Government bodies: We may be required by law to share personal information with government bodies and regulators (such as the Environment Agency).

8. SENDING PERSONAL INFORMATION OVERSEAS

8.1 We do not share or retain any information outside of the UK and Ireland.

9. PRIVACY RIGHTS

- 9.1 Individuals are entitled to exercise any of the following privacy rights in respect of our processing of personal information:
- (a) Access: Individuals can request access to a copy of their personal information held by us, along with details of what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision-making.
- (b) Rectification: Individuals can ask us to change or complete any inaccurate or incomplete personal information held about them.
- (c) Erasure: Individuals can ask us to delete their personal information where it is no longer necessary for us to use it, or where we have no legal basis for keeping it.
- (d) Restriction: Individuals can ask us to restrict the personal information we use about them where we are not able to erase their personal information or where an individual has objected to our use of their personal information.
- (e) Object: Individuals can object to our processing of their personal information.
- (f) Portability: Individuals can ask us to provide them or a third party with some of the personal information we hold about them in a structured, commonly used, electronic format so it can be easily transferred.
- (g) Withdraw Consent: Generally, we do not require consent to process personal information and so we do not ordinarily ask for consent to process personal information. However, where we do ask for consent to process personal information, individuals have the right to withdraw their consent at any time.
- 9.2 Please make all requests to exercise privacy rights in writing to info@eco-vend.co.uk.
- 9.3 We are required to verify the identity of anyone requesting to exercise their privacy rights and we may ask individuals to provide valid identification documents when making a request to allow us to do this.
- 9.4 We will not make any charge for responding to any request from an individual exercising their privacy rights, and we will respond to any requests in accordance with our obligations under data protection laws.
- 9.5 Individuals can make a complaint about how we have used their personal information to us by contacting us as noted above.

10. ONLINE ACTIVITIES

10.1 INFORMATION WE COLLECT

In running and maintaining our website we may collect and process the following data about you: We process personal information for certain legitimate business purposes which include, some or all, of the following:

- i. Information about your use of our site including details of your visits such as pages viewed and the resources that you access. Such information includes traffic data, location data and other communication data.
- ii. Information provided voluntarily by you. For example, when you register for information or make a purchase.
- iii. Information that you provide when you communicate with us by any means.
- iv. Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of the customer.
- v. To identify and prevent fraud.
- vi. To enhance the security of our networks and information systems.
- vii. To better understand how people, interact with our social media and web sites.
- viii. To provide postal communications which we think will be of benefit and interest to you.
- viv. To determine the effectiveness of our promotional campaigns and our advertising.

10.2 USE OF COOKIES

Cookies provide information regarding the computer used by a visitor. We may use cookies where appropriate to gather information about your computer in order to assist us in improving our website.

We may gather information about your general internet use by using the cookie. Where used, these cookies are downloaded to your computer and stored on the computer's hard drive. Such information will not identify you personally. It is statistical data. This statistical data does not identify any personal details whatsoever You can adjust the settings on your computer to decline any cookies if you wish. This can easily be done by activating the reject cookies setting on your computer.

Our advertisers may also use cookies, over which we have no control. Such cookies (if used) would be downloaded once you click on advertisements on our website.

10.3 USE OF YOUR INFORMATION

We use the information that we collect from you to provide our services to you. In addition to this we may use the information for one or more of the following purposes:

- i. To provide information to you that you request from us relating to our products or services.
- ii. To provide information to you relating to other products that may be of interest to you. Such additional information will only be provided where you have consented to receive such information.
- iii. To inform you of any changes to our website, services or goods and products.

If you have previously purchased goods or services from us we may provide to you details of similar goods or services, or other goods and services, that you may be interested in.

Where your consent has been provided in advance we may allow selected third parties to use your data to enable them to provide you with information regarding unrelated goods and services which we believe may interest you. Where such consent has been provided it can be withdrawn by you at any time. You have the right to object to this processing at any time.

If you wish to do so, please click here.

Please bear in mind that if you object, this may affect our ability to carry out the tasks above which may be of benefit to you. Whenever we process data for these purposes we will ensure that we always keep your Personal Data rights in the highest regard and take into account all of your data protection right under any and all current UK legislation.

10.4 STORING YOUR PERSONAL DATA

In operating our website it may become necessary to transfer data that we collect from you to locations outside of the European Union for processing and storing. By providing your personal data to us, you agree to this transfer, storing or processing. We do our upmost to ensure that all reasonable steps are taken to make sure that your data is treated stored securely.

Unfortunately the sending of information via the internet is not totally secure and on occasion such information can be intercepted. We cannot guarantee the security of data that you choose to send us electronically. Sending such information is entirely at your own risk.

10.5 DISCLOSING YOUR INFORMATION

We will not disclose your personal information to any other party other than in accordance with this Privacy Policy and in the circumstances detailed below:

- i. In the event that we sell any or all of our business to the buyer.
- ii. Where we are legally required by law to disclose your personal information.
- iii. To further fraud protection and reduce the risk of fraud.

10.6 THIRD PARTY LINKS

On occasion we include links to third parties on this website. Where we provide a link it does not mean that we endorse or approve that site's policy towards visitor privacy. You should review their privacy policy before sending them any personal data.

10.7 CONTACTING US

Please do not hesitate to contact us regarding any matter relating to this Privacy Policy by emailing us at info@eco-vend.co.uk or writing to Ecovend, ECO House, Lea Road, Waltham Abbey, Hertfordshire, EN9 1AS.