

Introduction

Smart Recycling Limited (as the operator of Smart Recycling and Smart Recycling brands) respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. Please be advised that the same data protection principles apply when you provide your information via telephone or email, where this information is required.

This privacy policy is provided in a layered format so that you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

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1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy notice:

This privacy policy aims to give you information on how Smart Recycling Limited (as the operator of Smart Recycling brands) collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, fill out the booking form, or get in touch with us via telephone or email.

This website is not intended for children and we do not knowingly collect data relating to children. It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

Controller:

We are Smart Recycling Ltd (company registration number 09493516), and we operate tSmart Recycling Brands (collectively referred to as “we”, “us” or “our”). We are the controller and are responsible for your personal data.

We have appointed a data protection (“**DPO**”) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact Details

Full Legal name of entity: Smart Recycling Limited

Email address: info@smartrecycling.org.uk,

Postal address: Unit 6-7 Omega Business Village, Thurston Road, Northallerton, DL6 2NJ, United Kingdom

Telephone number: Smart Recycling 01609 780 555

You have the right to make a complaint at any time to the Information Commissioner's Office (“**ICO**”), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review, so please check back regularly to see if there have been any updates. If we make any substantial changes, we may also email you if it's appropriate.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name and last name
- **Contact Data** includes collection address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting, location, browser plug-in types versions and operating system platform.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you do not wish to provide personal data it may result in us being unable to preform the contract you are wishing to enter into with us or are trying to enter into with you (for example, to provide you with collections services). In these instances we may have to cancel the service you have with us, but we will notify you if this is the case.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity Data and Contact Data by filling in forms or by corresponding with us by phone, email or otherwise. This includes personal data you provide when you:
 - apply for our services;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.

- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and server logs.
- **Third Party Sources.** We may receive Technical Data about you from Google
 - For more information about how Google deals with your data, please see: [Google's Privacy & Terms site](#).

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Please see the Glossary at clause 11 below to find out more about the types of lawful basis that we will rely on to process your personal data.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To process and deliver our services (including managing payments)	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you

To provide you with information you have requested from us, respond to enquiries or requests from you, and communicate with you in relation to those enquiries or requests	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to ensure our customers are informed and satisfied with our services and to handle enquiries to our business)
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy and asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)
To enable you to partake in a promotion, competition, or completion of a survey	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our services, to develop them and grow our business)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Usage (d) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our sites, services, customer	(a) Usage (b) Technical	(a) Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and

relationships and experiences		relevant and to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Usage (d) Technical (e) Marketing and Communications	(a) Necessary for our legitimate interests (to develop our services and grow our business)

Marketing

We may use your Identity, Contact and Marketing and Communications Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or used our services and you have not opted out of receiving that marketing, or if we consider that marketing communications may be of use to you.

Third-Party Marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data that we process and use on a different lawful basis, or in respect of which you continue to consent to us processing.

Cookies

We use cookies on our website, which may collect personal data. We may publish a separate Cookie Policy on our website to provide more information about the cookies we use.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

In order to perform the service you have requested we may employ third-party companies and individuals (acting as processors) due to the following reasons:

- Service providers (acting as processors) such as providers of IT, delivery services and payroll and system administration/support (including DeliveryChecker, Form Carry and OptimoRoute).
- Professional advisers (acting as controllers) including bankers, lawyers, auditors, accountants and insurers who provide banking, consultancy, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities (acting as controllers) who may require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes where they act for us as processors of data,

and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Most of the personal data we hold is held by us in the UK. However there may be occasions when we need to transfer or process data outside of the UK. We may do this only pursuant to a specific legal basis. Any such data transfer is usually based on one of the legal bases described below, however you can inquire with us to learn more, and in particular which legal basis applies to which specific service, through the contact details provided in this policy.

Data transfer based on standard contractual clauses

If this is the legal basis, the transfer of personal data from the UK to other countries is carried out according to standard contractual clauses made or approved under the Data Protection Act 2018. This means that data recipients have committed to process personal data in compliance with the data protection standards set forth by UK data protection legislation.

Data transfer to countries that guarantee appropriate data protection standards

If this is the legal basis, the transfer of personal data is carried out according to adequacy regulations made under the Data Protection Act 2018. These adequacy regulations are issued in respect of specific countries that provide personal data protection standards comparable to those in UK data protection legislation.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

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

8. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer

period in the event of a complaint or if we reasonably believe that there is a prospect of litigation in respect of our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see clause 11 below for further information.

9. CHILDREN'S PRIVACY

Our services are not intended for children, so we do not knowingly collect any data relating to children. In case we discover that a child who is under the age of 13 has provided us with personal information then this is immediately deleted from our system.

If you are a parent or guardian and you have knowledge that your child has given our system their information, please contact us as soon as possible so we are able to remove their information from the system.

10. YOUR LEGAL RIGHTS:

Under certain circumstances, you have rights under data protection laws in relation to your personal data and you are entitled to:

- Access a copy of your personal data.
- Correct or update your personal data.
- Erase your personal data.
- Object to the processing of your personal data where we are relying on a legitimate interest (as set out in the above table).
- Restrict the processing of your personal data.
- Request the transfer of your personal data to a third party.
- Where you have provided your consent to certain of our processing activities, in certain circumstances, you may withdraw your consent at any time (but please note that we may continue to process such personal data if we have legitimate legal grounds for doing so).

If you want to exercise any of these rights, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made.

11. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data** to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any

processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.