# Data Privacy Policy

Your privacy is important to us which is why we want to inform you on our updated Privacy Notice. To give you a more transparent and clear information on how we process your personal data, we have divided the Privacy Notice into different chapters. In each chapter, we describe in more detail what personal data we have about you and how we use it. We have also increased the information on your rights, for example how to get access to your data and how you can request to terminate the usage of your data.

# **PRIVACY NOTICE**

Data privacy is of high importance for Recycle Right and we want to be open and transparent with our processing of your personal data.

We therefore have a policy setting out how your personal data will be processed and protected.

# Who is the controller of your personal data?

**Recycle Right** is the controller of the personal data you submit to us and responsible for your personal data under applicable data protection law.

Companies register: 152666

Company registration number: 152666

Authorised representative: Michelle Nagle

VAT registration number: 6550066E

# Where do we store your data?

The data that we collect from you is stored within the European Economic Area ("EEA") but may also be transferred to and processed in a country outside of the EEA. Any such transfer of your personal data will be carried out in compliance with applicable laws.

For transfers outside the EEA, Recycle Right will use Standard Contractual Clauses and Shields as safeguards for countries without adequacy decisions from the European Commission.

## Who can access your data?

Your data may be shared within the EEA. We never pass on, sell or swap your data for marketing purposes to third parties outside the EEA.

Data that is forwarded to third parties, is only used to provide you with our services. You will find categories of third parties under every specific process below.

# What is the legal ground for processing?

For every specific process of personal data we collect from you, we will inform you whether the provision of personal data is statutory or required to enter a contract and

whether it is an obligation to provide the personal data and possible consequences if you choose not to.

#### What are your rights?

# Right to access:

You have the right to request information about the personal data we hold on you at any time. You can contact us and we will provide you with the necessary documents to request and receive your personal data.

#### Right to portability:

Whenever Recycle Right processes your personal data, by automated means based on your consent or based on an agreement, you have the right to get a copy of your data transferred to you or to another party. This only includes the personal data you have submitted to us.

#### Right to rectification:

You have the right to request rectification of your personal data if the information is incorrect, including the right to have incomplete personal data completed.

If you have a online account or you can edit your personal data under your account online

#### Right to erasure:

You have the right to erase any personal data processed by Recycle Right at any time except for the following situations:

\*you have an ongoing matter with Customer Service

\*you have an open order which has not yet been shipped or partially shipped

\*you have an unsettled debt with Recycle Right, regardless of the payment method

\*if you are suspected or have misused our services within the last four years

\*your debt has been sold to a third party within the last three years or one year for deceased customers

\*if you have made any purchase, we will keep your personal data in connection to your transaction for book-keeping purposes

\*if Recycle Right are required to retain the data for legislative/regulatory purposes.

# Your right to object to processing based on legitimate interest:

You have the right to object to processing of your personal data that is based on our legitimate interest. We will not continue to process the personal data unless we can demonstrate legitimate grounds for the process which overrides your interest and rights or due to legal claims.

#### Your right to object to direct marketing:

You have the right to object to direct marketing, including profiling analysis made for direct marketing purposes.

You can opt out from direct marketing by the following means:

- \* following the instruction in each marketing email
- \* by editing the settings of your account

#### Right to restriction:

You have the right to request that Recycle Right restricts the process of your personal data under the following circumstances:

- \* if you object to a processing based on legitimate interest, Recycle Right shall restrict all processing of such data pending the verification of the legitimate interest.
- \* if you have claim that your personal data is incorrect, Recycle Right must restrict all processing of such data pending the verification of the accuracy of the personal data.
- \* if the processing is unlawful you can oppose the erasure of personal data and instead request the restriction of the use of your personal data instead
- \* if Recycle Right no longer needs the personal data but it is required by you to defend legal claims.

#### How can you exercise your rights?

We take data protection very seriously and therefore we have dedicated customer service personnel to handle your requests in relation to your rights stated above. You can always reach them at info@recycleright.ie.

#### **Data Protection Officer:**

We have appointed a Data Protection Representative to ensure that we continuously process your personal data in an open, accurate and legal manner. You can contact our Data Protection Representative at info@recycleright.ie and write DPR as subject matter.

#### Right to complain with a supervisory authority:

If you consider Recycle Right to process your personal data in an incorrect way you can contact us. You also have the right to raise a complaint to a supervisory authority.

# **Updates to our Privacy Notice:**

We may need to update our Privacy Notice. The latest version of the Privacy Notice is always available on our website. We will communicate any material changes to the Privacy Notice, for example the purpose of why we use your personal data, the identity of the Controller or your rights.