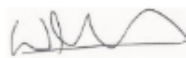


# Privacy Policy

SO Recycle Ltd  
Penton Mill, Newbury Hill  
Andover SP11 OSP

Signature:



Position: Director

Date: 08/01/2024

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## Introduction

Welcome to SO Recycle privacy policy.

SO Recycle Ltd respects your privacy and is committed to protecting your personal information. This privacy policy will inform you as to how we look after your personal information 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 also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

### **1. IMPORTANT INFORMATION AND WHO WE ARE**

### **2. THE DATA WE COLLECT ABOUT YOU**

### **3. HOW IS YOUR PERSONAL INFORMATION COLLECTED**

### **4. COOKIES**

### **5. HOW WE USE YOUR PERSONAL INFORMATION**

### **6. DISCLOSURES OF YOUR PERSONAL INFORMATION**

### **7. INTERNATIONAL TRANSFERS**

### **8. DATA SECURITY**

### **9. DATA RETENTION**

### **10. YOUR LEGAL RIGHTS**

### **11. GLOSSARY**

#### **1. Important information and who we are**

#### Purpose of this privacy notice:

This privacy policy aims to give you information on how SO Recycle Ltd collects and processes your personal information through your use of this website and your interaction with us. This will include any information you provide through this website when you sign up to our newsletter and use the contact us facility on the website.

This website is not intended for children and we do not knowingly collect information relating to children.

You can read this privacy policy in conjunction with any other privacy notices we provide to you. This privacy notice supplements the other notices and is not intended to override them.

#### Data Controller:

SO Recycle Ltd is the data controller and responsible for your personal information (collectively referred to as "the Company", "SO Recycle", "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy policy, please contact the data privacy manager using the details set out next.

Our full details are: SO Recycle Ltd

Full name of legal entity: SO Recycle Ltd

Name or title of data privacy manager: William Murray

Email address: [compliance@sorecycle.co.uk](mailto:compliance@sorecycle.co.uk)

Postal address: Penton Mill, Newbury Hill, Andover SP11 0SP

Phone Number: 023 8026 5254

If you have any concerns about the way we handle your personal information or any questions, please contact us so that we may respond to your concerns and have the opportunity to put things right. You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). Changes to the privacy notice and your duty to inform us of changes.

This version was last updated on January 2024.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information 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 information 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 policy of every website you visit.

## ***2. The information 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 information where the identity has been removed (anonymous information).

We may collect, use, store and transfer different kinds of personal information about you depending on the relationship we have with you. These different types of information have been grouped together follows:

Identity Information includes first name, last name, title.

Contact Information includes billing address, delivery address, email address and contact telephone numbers.

Financial Information includes bank account and payment card details.

Transaction Information includes details about payments to and from you and other details of products and services you have purchased from us.

Technical Information includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Profile Information includes purchases or orders made by you, feedback and survey responses.

Usage Information includes information about how you use our website, products and services.

Marketing and Communications Information 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 fail to provide personal information:

Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### ***3. How is your personal information collected?***

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

Direct interactions. You may give us your name, contact information and payment information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:

- apply for our products or 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 information by using cookies and other similar technologies.

Third parties or publicly available sources:

We may receive personal information about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- analytics providers (such as Google based outside the EU)
- advertising networks such as LinkedIn (based inside the EU)

- search information providers (such as Google based outside the EU)
  - Contact, Financial and Transaction Information from providers of technical, payment and delivery services such as Worldpay which process credit card payments on our behalf.
- Identity and Contact Information from data brokers based inside the EU.
- Identity and Contact Information from publicly available sources such as Companies House.

#### **4. Cookie Policy**

This section explains what cookies are, how SO Recycle uses them on our websites and what you can do to manage how they are used.

##### Cookies and how they benefit you:

Our website uses cookies, as almost all websites do, to help provide you with the best experience we can. Cookies are small text files that are placed on your computer or mobile phone when you browse websites.

Our cookies help us:

- Make our website work as you'd expect.
- Remember your settings during and between visits.
- Improve the speed/security of the site.
- Allow you to share pages with social networks like Facebook.
- Continuously improve our website for you.
- Make our marketing more efficient (ultimately helping us to offer the service we do at the price we do).

##### Granting us permission to use cookies:

If the settings on your browser that you are using to view this website are adjusted to accept cookies, we take this, and your continued use of our website, to mean that you are fine with this.

Should you wish to remove or not use cookies from our site you can learn how to do this below, however doing so will likely mean that our site will not work as you would expect.

##### How long do cookies last?

When a web server sends a cookie, it asks your browser to keep that particular cookie until a certain date and time.

These dates can be:

Some date in the future – which might be a few minutes or a few hours from now (to track something like your shopping cart in an online store). The cookie might expire many years in the future, to keep track of your browser for a long time.

When you close your browser – this is called a session cookie, the next time you start your browser these will have vanished. Some date in the past – this is how the server asks a browser to remove a previously-stored cookie.

### Our own cookies

We use cookies to make our website work including anonymous visitor statistics cookies. We use cookies to compile visitor statistics such as how many people have visited our website, what type of technology they are using, how long they spend on the site, what page they look at, etc. This helps us to continuously improve our website. These analytics programs also tell us, on an anonymous basis, how people reached this site (e.g. from a search engine) and whether they have been here before, helping us to develop our services for you. Our site uses Google Analytics to track this information.

### Third party functions:

Our site, like most websites, includes functionality provided by third parties. A common example is an embedded YouTube video. If you choose to disable these cookies, it will likely break the link to the video or affect the functionality.

### Social website cookies:

So you can easily 'Like' or 'Share' our content on social network sites, we have sharing buttons on our site from Facebook, Twitter, LinkedIn and Instagram. The privacy implications on this will vary from social network to social network and will be dependent on the privacy settings you have chosen on these networks.

### Turning cookies off:

You can usually switch cookies off by adjusting your browser settings to stop it from accepting cookies. Doing so, however, will likely limit the functionality of ours and a large proportion of the world's websites as cookies are a standard part of most modern websites.

## **5. *How we use your personal information***

We will only use your personal information where there is an appropriate legal basis in place. Most commonly, we will use your personal information 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 or regulatory obligation.

### Purposes for which we will use your personal information:

We have set out below, in a table format, a description of all the ways we plan to use your personal information, 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 information for more than one lawful ground depending on the specific purpose for which we are using your information. Please contact us if you need details about the specific legal basis, we are relying on to process your personal information.

Purpose/Activity	Type of information	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) 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 products/services)
To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system	(a) Identity (b) Contact	(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



Purpose/Activity	Type of information	Lawful basis for processing including basis of legitimate interest
maintenance, support, reporting and hosting of data)	(c) Technical	business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

### Marketing

We strive to provide you with choices regarding certain personal information uses, particularly around marketing and advertising.

#### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Information 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 products, 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 purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

#### 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 or by contacting us at any time.

### Change of purpose

We will only use your personal information 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 information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **6. *Disclosures of your personal information***

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

Worldpay – in order to provide credit and debit card processing facilities.

PandaDoc – Our contracts are electronically signed and retained on the PandaDoc servers.

Mailchimp – to provide newsletter and email services

Lili Waste, Biffa, Veolia Environmental Services – to collect recycling waste on our behalf.

Professional Advisors such as accountants, auditors, lawyers and insurers.

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 information in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal information and to treat it in accordance with data protection legislation. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

### **7. *International transfers***

We aim to ensure that all personal information we collect is held within the EEA, although when this is not possible, we will look to ensure that your information is held securely and in line with data protection legislation, for example when transferring information to the United States, we only work with companies that are privacy shield registered.

### **8. *Information security***

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only

process your personal information on our instructions and they are subject to a duty of confidentiality.

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

## **9. Data retention**

### How long will you use my personal information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. For example, we retain all accounting records for a period of 7 years before they are destroyed.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. We have in place a data retention policy setting out the timescales for various information and the associated destruction periods. If you wish to know how long certain information is retained, please contact us and we can provide more information.

## **10. Your legal rights**

You have a number of rights about how the personal information you provide can be used. These are:

- Transparency over how we use your personal information (right to be informed).
- The ability to request a copy of the information we hold about you, which will be provided to you within one month (right of access).
- Update or amend the information we hold about you if it is wrong (right of rectification).
- Ask us to stop using your information (right to restrict processing).
- Ask us to remove your personal information from our records where the information is not being held for a legal obligation (right to be 'forgotten').
- Object to the processing of your information for marketing purposes (right to object).
- Obtain and reuse your personal information for your own purposes (right to data portability).
- Not be subject to a decision when it is based on automated processing (automated decision making and profiling).

If you would like to know more about your rights under the data protection law, you can find out more at the Information Commissioners Office website ([www.ico.org](http://www.ico.org)).

Remember, you can change the way you hear from us or withdraw your permission for us to processing your personal information at any time by using the form on our 'Contact Us'.

#### What we may need from you when you make a request

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information 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.

### **11. Glossary**

#### LAWFUL BASIS

##### Legitimate Interest

This means the interest of our business in conducting and managing our business to enable us to give you the best service/product 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 information for our legitimate interests. We do not use your personal information 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.

##### Performance of Contract

This means processing your information where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

##### Comply with a legal or regulatory obligation

This means processing your personal information where it is necessary for compliance with a legal or regulatory obligation that we are subject to.