

Privacy Statement

The purpose of this statement is to provide information regarding how and why Uniq Recycling Ltd collect, process and store data, as well as providing the appropriate contact information should you wish to request the information we hold about you, withdraw from processing or request deletion of any data we hold about you.

Under the **EU General Data Protection Regulation (GDPR)** there are six lawful bases for processing personal data. These are detailed as follows:

- **Consent** – the individual has given clear consent for you to process their personal data for a specific purpose
- **Contract** – the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract
- **Legal Obligation** – the processing is necessary for you to comply with the law (not including contractual obligations)
- **Vital Interests** – the processing is necessary to protect someone's life
- **Public Task** – the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law
- **Legitimate Interests** – the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

Further information regarding the lawful basis for processing personal data can be found at ico.org.uk

Uniq Recycling Marketing and Sales Data

As an organisation that processes business related data, Uniq Recycling has assessed all six grounds for lawful processing of personal data and has selected 'Legitimate Interests' as the most suitable lawful ground for the processing of data for the purposes of Uniq Recycling marketing and sales.

Uniq Recycling collects, processes and stores data relating to businesses and decision makers. We believe that the individuals that we process the data of, are likely to have an interest in Uniq Recycling products and/or services. Deemed as 'Legitimate Interest' this is

based upon specific criteria including the business industry sector, size of organisation as well as the individual's job function within the organisation. Our typical segmentation includes those within marketing, sales, business development, Finance, MD and owner related job functions, although this list is not exhaustive and other variables may apply. We will only ever collect, process and store the essential information required for making contact with the data subjects within a business environment. The personal data we collect is limited to first name, last name, email address, social profiles (limited to LinkedIn) as well as business IP and physical address. Other business-related data may also be processed including business name, job function, and turnover, however we will never collect further personal data such as those classed under 'Special Categories of Personal Data'.

The data collected will be used to communicate marketing and sales messages relating to Uniq Recycling products and services, based upon the job function held by the data subject. Uniq Recycling specifically only sends messages to those we believe are likely to be interested in our products and services based upon the organisation they are employed by and based upon their job function within that organisation. Messages from Uniq Recycling could be delivered via email, social media, via telephone or any other business to business (B2B) marketing methods that may be relevant.

When you send Uniq Recycling an enquiry or booking form via our website or one of our micro sites you will be asked to provide your contact details. We will use the data you provide to process your request and may use it to inform you by email, telephone or mail about other products and services that we feel may be of interest to you. It is deemed that if you have visited our website and provided us with your contact information that you are legitimately interested in our products and services. You have the right to object from any method of correspondence at any time, via email, by informing the telephone operator or by contacting us via any of the methods below.

How we Procure Data

At Uniq Recycling we procure data in a variety of ways, collected in line with the lawful basis of 'Legitimate Interests'. If you have received correspondence from us, we will have procured your data in one of the following ways:

- You have requested information from Uniq Recycling on a previous occasion
- Someone has sent us your e-mail address requesting information about our articles and/or services be sent to you.
- You or someone else has expressly shared your contact details with us for the purpose of receiving information now and/or in the future

- We have previously met at an event and your business card or contact details were handed to us willingly
- You or a business colleague has visited our website and we believe that there is a genuine legitimate interest in our services
- You have previously connected with a member of our team via LinkedIn and discussed our services
- A member of our team has found your business and your contact details online, believing that your business would genuinely be interested in Uniq Recycling's products and/or services.
- Your data has been purchased from a registered third party data supplier, which will have been segmented by industry, organisation size and job function based upon our typical customer profiles and the legal basis for our processing of this data has been established and verified.

Legitimate Interest Assessment (LIA)

Uniq Recycling Ltd has carried out a Legitimate Interest Assessment (LIA) as advised by the ICO. Based upon that assessment it is deemed that the rights and freedoms of the data subjects would not be overridden in our correspondence regarding and that in no way would a data subject be caused harm by our correspondence. Based upon our segmentation by organisation and by specific job function, coupled with our processing of personal data within the context of a business environment, we believe that any individual that receives correspondence from Uniq Recycling in a direct marketing or sales capacity, could be legitimately interested in our products or services. It is also deemed that direct marketing and sales is necessary in the context of promoting Uniq Recycling to professionals in business in order to increase awareness of our Products and services.

Per the ICO guidance, Uniq Recycling can confirm:

- We have checked that legitimate interests is the most appropriate basis
- We understand our responsibility to protect the individual's interests
- We have conducted a legitimate interests assessment (LIA) and kept a record of it, to ensure that we can justify our decision
- We have identified the relevant legitimate interests
- We have checked that the processing is necessary and there is no less intrusive way to achieve the same result

- We have done a balancing test, and are confident that the individual's interests do not override those legitimate interests
- We only use individuals' data in ways they would reasonably expect
- We are not using people's data in ways they would find intrusive or which could cause them harm
- We do not process the data of children
- We have considered safeguards to reduce the impact where possible
- We will always ensure there is an opt-out / ability to object
- Our LIA did not identify a significant privacy impact, and therefore we do not require a DPIA
- We keep our LIA under review every six months, and will repeat it if circumstances change
- We include information about our legitimate interests in this privacy notice

Uniq Recycling has an in-house data verification manager, who is responsible for ensuring the validity and quality of the data contained within the Uniq Recycling CRM system.

Data Storage and Retention

The data held within the Uniq Recycling CRM system is processed and stored in the UK within a secure environment.

We will use your data to update you with details of our product and service offerings, However, we will delete your data should you no longer show interest in these details at a time 5 years after the last verifiable contact we have with you.

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Security of personal data

Appropriate measures

We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse, or alteration of your personal data.

Secure storage

We will store all your personal data on secure servers, personal computers, and mobile devices, and in secure manual record-keeping systems.

Password storage

Any passwords you provide us will be stored by us in encrypted form.

Financial transactions

Data relating to financial transactions that is sent from your web browser to our web server, or from our web server to your web browser, will be protected using encryption technology.

Acknowledgement of you transmitting unencrypted data

You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of that data sent over the internet

Providing your personal data to others

In this Section, we provide you with information about which third parties we may pass your data to.

Our technical providers

Your personal data may be stored in our data centre, on our telephony system and servers where it may be accessed by third party administrators insofar as is reasonably necessary for the safe and efficient storage of your data. We may use trusted third parties such as email service providers and campaign analytics services who may process your personal data at our request in order to maximise the efficiency of our communications with you.

Our payment providers

Financial transactions relating to our website and services may be handled by our payment services provider, PayPal. We will share transaction data with our payment services provider only to the extent necessary for the purposes of processing your payments, refunding such payments, and dealing with complaints and queries relating to such payments and refunds.

Our productivity and communication application providers

We may use your personal data in our internal productivity and communication applications insofar as is reasonably necessary for the purposes of proper administration of our website and business.

For compliance with a legal obligation

In addition to the specific disclosures of personal data set out in this Privacy Policy, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Right to Object

In all correspondence with you we will give you the right to object from receiving further correspondence from Uniq Recycling. On any emails you receive there will be the option to 'unsubscribe' from receiving any further email correspondence. If you receive a telephone call from us, you have the right to request not to receive any further calls. Uniq Recycling has a companywide CRM system. Your request to object will be logged within our CRM system to ensure that you do not receive any further calls.

Should you wish to object to receiving communication from Uniq Recycling, you can do so in a variety of ways:

- Email info@unigrecycling.co.uk with "Unsubscribe" in the subject line
- If you have received a call, please tell the representative that you do not wish to receive any further communication
- Please call 0800 6893157 and ask to speak with the Data Compliance Team

You can also make your request by writing to:

Data Compliance, Uniq Recycling Ltd, Charter House, Stanier Way, Wyvern Business Park, Derby, DE21 6BF

All requests will be processed within 30 days. Please note this applies only to the processing of your personally identifiable data, not that of the business data which does not fall under the remit of GDPR.

Right to Request Erasure

It is important to understand the difference between a right to object and a request for deletion. If you make a request for deletion, we will remove any data we hold about you from Uniq Recycling CRM system. If you do not wish for us to contact you again about our products and services, we would recommend you request to object rather than make a request for deletion, as this will ensure that your details are always suppressed from processing. The option however is yours, and in either case we will process your request within 30 days.

Please make your request in writing by emailing:

info@uniqrecycling.co.uk

Or by writing to:

Data Compliance, Uniq Recycling Ltd, Charter House, Stanier Way, Wyvern Business Park,
Derby, DE21 6BF

Right to Access

You may request that we send you all of the data we hold that relates to you. Please make your request in writing;

By emailing:

info@uniqrecycling.co.uk

Or by writing to:

Data Compliance, Uniq Recycling Ltd, Charter House, Stanier Way, Wyvern Business Park,
Derby, DE21 6BF

We will process and respond to your request within 30 days, this service will be free of charge.

Under the GDPR you have a number of data privacy Rights including those listed above. For more information on these rights please see the website of the Information Commissioner's Office at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

This policy was last reviewed and updated on the 23 May 2018. Policies are periodically reviewed to ensure compliance with the current compliance environment.

For questions relating to this policy, please email info@uniqrecycling.co.uk

For further information on the GDPR as well as other Data Protection and Data Privacy issues and regulations please visit www.ico.org.uk