

Introduction

PRM Green Technologies Ltd respects your privacy and is committed to protecting your personal data. This notice will inform you how we hold your personal data that we collect. We will also tell you your privacy rights and how the law protects you. This applies to the following:

People who use our service:

- People who get in touch with in any way (e.g. telephone, social media, post, email or our website).
- Employees or representatives of organisations who use our services or supply us with goods or services.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. This privacy notice supplements the other notices and is not intended to override them.

Who are we?

PRM Green Technologies Ltd is the controller and are responsible for your personal data that we have collected (referred to as “we”, “our” and “us” in this privacy notice)

We take your privacy seriously. As such both company Directors have overall joint responsibility for information security and data protection. If there are any questions or queries regarding this privacy notice then please feel free to get in touch.

PRM Green Technologies Ltd, Unit 16A Watling Street Business Park, Cannock, Staffordshire, WS11 9XG.

0800 840 9195, recycle@prmgreentech.com

Complaints

In the unfortunate circumstance that you wish to make a complaint we would respectfully request you come to us in the first instance. However, if you are not satisfied with this you have the right to make a complaint at any time to the ICO (Information Commissioner’s Office). This can be done via their website of www.ico.org.uk/concerns

We try and keep our data as up to date as possible. In order to ensure your information is accurate, please keep us updated on any changes that may be relevant. We reserve the right to update this privacy notice at any time.

Third-party links

We try and keep any third-party links and plugins on our website to a minimum, however sometimes this is unavoidable. Please be aware that clicking any of the afore mentioned may make a connection to an external website which may allow third parties to collect or share data about you (e.g. a video link to YouTube). When this is the case we strongly advise you to read their privacy statements as we have no control over what data said websites may hold/collect on you.

What data we collect

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 which we have collected as the following:

1. Identity Data
 - a. Title
 - b. First name
 - c. Last name
 - d. Username etc (e.g. eBay username)
2. Contact Data
 - a. Billing address
 - b. Invoice address
 - c. Email address
 - d. Telephone number(s)
3. Financial Data
 - a. PayPal email address
 - b. Transaction ID
 - c. Bank account details
4. Transaction Data
 - a. Payments to and from us
 - b. Details about purchases made
 - c. Dates of collections and what items
 - d. Weights of collections
5. Technical Data (Mainly Google Analytics)
 - a. IP Address
 - b. Browser type and version
 - c. Time zone
 - d. Operating system
 - e. Platform
 - f. Technology used to access website
6. Profile Data
 - a. Username (e.g. eBay username)
 - b. Details of purchases
 - c. Orders made
 - d. Feedback
7. Usage Data
 - a. How you use our website and services
8. Marketing information
 - a. Your preferences on receiving mail shots from us via 3rd parties

There is an element of unknown data which can refer to the data that we receive on devices. Please note when we receive devices which may contain data, this data is not accessed by us at any point. All data bearing devices are either securely wiped or destroyed.

We may also use data for reporting purposes such as what products are most popular, vouchers used, popular collection demographic data. Although this data is derived from your data it is not considered personal as it cannot be used to identify a person directly or indirectly. An example of this could be generating reports for the Environment Agency of collected equipment weights by county.

We do not collect any data from you that could be considered “Special category” for example:

- Race
- Ethnic origin
- Politics
- Religion
- Trade union membership
- Genetics
- Biometrics (where used for ID purposes);
- Health
- Sex life or sexual orientation.

Sometimes we will need to collect personal data by law, or if there are terms of a contract we may have with you. If you fail to provide the requested data we may not be able to perform the contract we have or are trying to enter with you. If this becomes the case then we may have to cancel the service you have with us but we will of course notify you of this fact.

How do we collect information?

We collect information in different ways including the following:

- When you buy a product from us
- When you book a collection with us
- When you contact us for information on our services
- When you give us feedback
- When you visit us on site
- When you visit our website
- When you interact with us via Social Media

When someone visits our website, we use third-party services such as Google Analytics and Pure Chat to collect standard information log, information and details of visitor behaviour. We do this to find out things such as the number of visitors to the various parts of the site.

The information we use by google does not identify anyone. If you have previously used Pure Chat with us before and given your name it may identify you as a visitor depending on certain criteria's such as using the same I.P address etc.

Third parties or publicly available sources. We may receive personal data 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;
- Search information providers Linked In based inside the EU.

Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

How we use your personal data

We will only use your personal data as the law permits. We would normally use your personal data in the following instances:

- Where we need to perform the contract, we are about to enter into or have previously entered into with you.
- We do not use your personal data for anything other than our business interests. We take your personal data very seriously, we take all factors into consideration such as any possible impact on you before we use any data.
- The main reason for us using your personal data is to provide you with the best possible service we can. We also need to use your data for security purposes to provide the most secure service that we possibly can.
- Where we need to fulfil our legal obligation to comply with regulations.

In general, we do not rely on your consent for processing your personal data apart from, sending marketing information via third parties, predominantly via email. At any point if you wish to change your marketing preferences you can do so via:

- Logging into your online portal and changing the opt in box in the account settings
- The use of the unsubscribe link on emails received
- Contacting your account manager if applicable
- Contacting us via post to PRM Green Technologies, 16A Watling Street Business Park, Cannock, Staffordshire, WS11 9XG
- Contacting us via telephone on 0800 840 9195
- Contacting us via email via recycle@prmgreentech.com

The purposes that we may use your data

We may use your personal data for more than one legal purpose. Please see below for our legitimate interest for doing so:

Purpose/Activity	Type of Data	Lawful basis for processing and legitimate business interest.
To add you to our Customer Relationship Management System (CRM) as a new client	1. Identity Data 2. Contact Data	<ul style="list-style-type: none">• To add details to our CRM for collections and traceability.
To manage our relationship with you and your organisation	1. Identity Data 2. Contact Data 4. Transaction Data 6. Profile Data 8. Marketing Data	<ul style="list-style-type: none">• Required for legitimate interests and keeping our records up to date.• To comply with legal obligations• To facilitate a contract, we have with you or are about to enter in with you.
To provide details of assets and data destruction	1. Identity Data 2. Contact Data	<ul style="list-style-type: none">• Required for legitimate interests

		and keeping our records up to date.
To manage any payments, charges and fees	<ol style="list-style-type: none"> 2. Contact Data 3. Financial Data 4. Transaction Data 	<ul style="list-style-type: none"> • Required for legitimate interests and keeping our records up to date. • To comply with legal obligations • To facilitate a contract, we have with you or are about to enter in with you.
Sale through various sales channels	<ol style="list-style-type: none"> 1. Identity Data 2. Contact Data 3. Financial Data 4. Transaction Data 5. Technical Data 6. Profile Data 	<ul style="list-style-type: none"> • Required for legitimate interests and keeping our records up to date. • To comply with legal obligations • To facilitate a contract, we have with you or are about to enter in with you.
Ask for feedback, details on prize draw or ask to fill in a survey.	<ol style="list-style-type: none"> 2. Contact Data 6. Profile Data 8. Marketing Data 	<ul style="list-style-type: none"> • To facilitate a contract, we have with you or are about to enter in with you. • To be able to see what our customers think of our services and how we can perform better.
The use of data analytics on our website	<ol style="list-style-type: none"> 5. Technical Data 7. Usage Data 	<ul style="list-style-type: none"> • Required for legitimate interests and to see how our website is used.
To protect our business and administer our website (Including troubleshooting, testing, system support etc)	<ol style="list-style-type: none"> 1. Identity Data 2. Contact Data 3. Transaction Data 4. Technical Data 	<ul style="list-style-type: none"> • Required for legitimate interests and keeping our records up to date. Required for any administration of our IT services, preventing fraud etc. • To comply with legal obligations

Marketing

We may use your identity, contact, technical, usage and profile data for our own marketing reasons. We will use this to see what we think may or may not be of interest to you.

Unless you have opted out you may receive marketing information from us. You can opt out at any time by contacting us. Our details are in the “Who are we?” at the start of this policy. If you receive a marketing email from us you can simply reply asking to be opted out or use the link at the bottom of the email to opt out.

Please note that if you have used us for a service you cannot opt out of receiving communication relating to this for example receiving a data destruction certificate.

Most browsers are automatically set to accept cookies. But, if you wish, you can configure your browser to restrict cookies or block all cookies by changing your browser settings. You can visit youonlinechoices.com which contains comprehensive information on how to do this on a wide variety of browsers. You will also find details on how to delete cookies from your computer as well as more general information about cookies. For information on how to do this on the browser of your mobile phone you will need to refer to your handset manual.

We will only use your personal data for the purposes we originally collected it, that is unless we need to use it for another business purposes that we consider reasonable. Again, this will be within the reason of the original collection of the information.

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.

Disclosure of your personal data

From time to time we may need to share your personal data with third parties as mentioned in the purposes above. These third parties are:

- SmartHosting- Website & CRM hosting
- 123reg – Domain registrar
- Microsoft 365 – Email hosting
- Design 380 – Platform design & support
- Total IT Services – Technical Support
- Mail Chimp – Email Communication
- Vivi VOIP – VoIP Services
- Royal Mail – Postal Services
- UPS – Postal Services

Please note we may pass some details over to professional advisers who may act as processors or joint controllers. This would be advisors such as bankers, lawyers, accountants, auditors, insurers etc. These may be the following:

- HCB – Accounting
- IHN – Insurance Brokers
- Hiscox – Insurance

- QMS – Compliance Auditors
- Environment Agency – Waste Accreditations and quarterly returns

Details may also be passed to HMRC and Law Enforcement agencies acting as processors or joint controllers based in the UK as required.

International Transfers

We do not transfer your personal data outside of the EU.

Data Security

We have various security measures in place to protect your personal data from being lost, used/accessed in unauthorised ways, altered or disclosed. Our services comply with ISO 27001 (Information Security Management Standard). Part of this is limiting data that is available to employees, contractors, and other third parties who have a legitimate business reason for needing the data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Data Retention

We will only hold your data as long as we see necessary in order to fulfil the purpose the data was originally collected e.g. Reporting and accounting.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

We reserve the right to anonymise your personal data in such a way that it cannot be associated to you. We may do this for reasons such as statistical research.

In certain circumstances you may ask us to delete your data.

Your Legal Rights

You have rights under data protection laws in relation to your personal data. These are outlined below:

You have the right to request access to your personal data. This will enable you to see what personal data we are holding and to check we are processing it lawfully.

You can request a correction of any of the personal data we hold about you. We may however need to verify the updated information you give to us.

You have the right to have your personal data erased where you have successfully exercised your right to remove consent of your data being processed, or if there is a problem with the underlying legality of the processing. E.g. when data is no longer necessary or no longer for the purpose which it was originally collected/processed.

You have the right to object to us processing your personal data where 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.

You have the right to restrict the processing of your personal data. We can suspend the processing of your data for two different reasons:

- If you have disputed the data accuracy (the time whilst this is verified)
- If you have objected to processing (whilst we verify the grounds for processing)
- When the processing is unlawful but you do not want us to erase your data instead and
- When we no longer need the data but you require the personal data to establish, exercise or defend legal claims.

You have the right to be provided with your personal data in a structured, commonly used, machine readable format. You can also request the data to be transmitted to another controller. Please 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.

You have the right for your personal data not to be used in any profiling and automated decision making. For example, automated decision making based on personal data to analyse behaviour, interests etc.

If you wish to exercise your right to any of the above, please get in touch with us.

Fees

You will have no fee to pay in order to access your personal data or to exercise your right as outlined in the "Your Legal Rights" section. However please note we do reserve the right to charge a fee if your request is manifestly unfounded or excessive, particularly as it is repetitive. If this is the case, we may even choose to refuse your request.

Time to Respond

Information must be provided to you without delay and at the latest within one month of receipt. We may be able to extend the period of complaint by a further two months where requests are complex and numerous. If this is the case, we will inform you within one month of the receipt of the request and explain why the extension is necessary.

What We May Need from You

When contacting us to request specific information/data we may need some information from you in order to identify you and ensure you have the right to access your personal data. This includes the items featured in the “Your Legal Rights” section.

This is for security purposes, we may also get in touch with you for further details which may help us to speed up your request.