

# **NORTHERN RECYCLING SOLUTIONS LTD**

## **CUSTOMER PRIVACY NOTICE**

## Who We Are

Northern Recycling Solutions LTD ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Northern Recycling Solutions' registered office is at Alexander House, River Drive, Alness and we are a company registered in Scotland under company number SC 348926. We are registered on the Information Commissioner's Office Register; registration number ZA230551, and act as the data controller when processing our customer, supplier and employee data and as a data processor when securely destroying our customer's confidential data. Our designated Data Protection Officer is Ewan Calder, who can be contacted at Alexander House, River Drive, Alness, [ewan@nrswm.co.uk](mailto:ewan@nrswm.co.uk), 0345 8945130.

## Information That We Collect

Northern Recycling Solutions processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data that we collect from you : -

- Name
- Home Address
- Business Address
- Personal Email
- Business Email
- Business Telephone Number
- Home Telephone Number
- Mobile Telephone Number
- Bank details

We collect information in the following ways: - by phone, online form, in person, by email.

## **How We Use Your Personal Data (Legal Basis for Processing)**

Northern Recycling Solutions takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. The purposes and reasons for processing your personal data are detailed below: -

- We collect your personal data in the performance of a contract or to provide a service and to ensure that orders are completed and can be sent out to your preferred address
- We collect and store your personal data as part of our legal obligation for business accounting, duty of care and tax purposes
- We have a legal obligation to share your personal data with Credit Safe who are a credit reference agency and provide us with financial background checks prior to you commencing employment with us
- We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests

## **Your Rights**

You have the right to access any personal information that Northern Recycling Solutions processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

Please note that no automated decision-making occurs at present.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

### **Sharing and Disclosing Your Personal Information**

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. Northern Recycling Solutions uses third-parties subcontractors to provide some elements of our service delivery; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures. The only information we provide them with is your name, address, contact details and order details to meet business and legal requirements.

### **Safeguarding Measures**

Northern Recycling Solutions takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including: -

Restrict physical and digital access, IT authentication to all systems and terminals, complex and secure password policy, firewalls, anti-virus, backups, app aware backups.

### **Transfers Outside the EU**

Northern Recycling Solutions do not transfer or store any personal data outside the EU.

### **Consequences of Not Providing Your Data**

You are not obligated to provide your personal information to Northern Recycling Solutions, however, as this information is required for us to provide you with our services, we will not be able to offer our services without it.

### **Legitimate Interests**

As noted in the 'How We Use Your Personal Data' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

### **How Long We Keep Your Data**

Northern Recycling Solutions only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (name, address, contact details) for a minimum of 6 years after which time it will be destroyed. We hold a Data Retention Register that records data retention periods for the types of information held. This is reviewed regularly.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.