



TOTAL RECYCLING SERVICES

waste management innovation



WEBSITE PRIVACY POLICY

This privacy notice was last updated on: 22/5/2018

Introduction

Welcome to the Total Recycling Services privacy notice.

Total Recycling Services respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data 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.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1) IMPORTANT INFORMATION AND WHO WE ARE	1
2) THE DATA WE COLLECT ABOUT YOU	2
3) HOW IS YOUR PERSONAL DATA COLLECTED?	3
4) HOW WE USE YOUR PERSONAL DATA	3
5) DISCLOSURES OF YOUR PERSONAL DATA	6
6) INTERNATIONAL DATA TRANSFERS	6
7) DATA SECURITY	6
8) DATA RETENTION	6
9) YOUR LEGAL RIGHTS	7
10) GLOSSARY	7

1) Important information and who we are

Total Recycling Services are one of the UK's leading waste management providers who employ over 90 skilled employees in Darlington. Our mission is to promote and encourage a zero to landfill approach to waste management.

Purpose of this privacy notice

This privacy notice aims to give you information on how Total Recycling Services collects and processes your personal data through your use of this website, including any data you may provide through this website when you [sign up to our newsletter, purchase a product or service or take part in a competition].

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

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you

so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Total Recycling Services are the controller and responsible for your personal data (collectively referred to as TRS "we" or "us" 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 notice, including any requests to exercise your legal rights, please contact Liam Watson using the details set out below.

Contact details

Our full details are

Full name of legal entity: Total Recycling Services Limited

Email address: liam.watson@totalrecyclingservices.co.uk

Postal address: Total Recycling Services, Innovation House, Lingfield Way, Yarm Road Business Park, Darlington, DL1 4PZ.

You 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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Your duty to inform us of changes

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

2) The data 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 data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

Identity Data includes [e.g. first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender].

Contact Data includes [e.g. billing address, delivery address, email address and telephone numbers].

Financial Data includes [e.g. bank account and payment card details].

Transaction Data includes [e.g. details about payments to and from you and other details of products and services you have purchased from us].

Technical Data includes [e.g. internet protocol (IP) address, your login data, 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 Data includes [e.g. your username and password, purchases or orders made by you, your interests, preferences, and feedback and survey responses].

Usage Data includes [e.g. information about how you use our website, products and services].

Marketing and Communications Data includes [e.g. your preferences in receiving marketing from us and our third parties and your communication preferences].

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. How is your personal data collected?

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

Direct interactions. You may give us your [Identity Data] by filling in forms or by corresponding with us by post, phone, and email or otherwise. We may use your information to:

Automated technologies or interactions.

When someone visits our website (www.totalrecyclingservices.co.uk) we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

3) How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To seek your views or comments on the services we provide;
- To notify you of changes to our services;
- To send you communications which you have requested that may be of interest to you which can include information about
- Recent activities & promotions of our services.
- Changes in environmental and waste management legislation.
- Trending news pieces from the waste management and environmental sectors
- To improve our email newsletter
- To improve our services
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to direct marketing communications sent to you via a third party email provider. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity – first name, surname (b) Contact – email address	Lawful basis - performance of a contract with you
To send us an enquiry using the websites contact form	(a) Identity – first name, surname (b) Contact – email address (c) Details of enquiry	To allow users of the website to contact us with an enquiry and allow us to respond to the enquiry – i.e. lawful basis to perform a contract. <i>Removal of the data will be conducted 1 month following start date of the contract should our quote be unsuccessful.</i>
To opt in to our email newsletter	(a) Identity – first name, surname (b) Contact – email address	To deliver our email newsletters – i.e. legitimate interest lawful basis for the processing of personal data for direct marketing purposes to prospective customers and relevant and appropriate relationship for current customers.
To		

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We use a third party email provider, Campaign Monitor, to deliver our newsletter campaigns and store your email address and contact name. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve the newsletter. The information we collect is very securely stored within ours and Campaign Monitors servers on-site. It is highly protected

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data 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 ONLY if you have provided us with your details when you opted in to the received our newsletter and you have not opted out of receiving that marketing.

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.

Third-party marketing

Other than for our utilisation of Campaign Monitor we do NOT share your information with third parties, we do NOT share your email address with sponsors or any third parties, and we do NOT run exclusive 'sponsored' emails on behalf of third parties.

Cookies

Total Recycling Services ("us", "we", or "our") uses cookies on www.totalrecyclingservices.co.uk

(The "Service"). By using the Service, you consent to the use of cookies.

Our Cookies Policy explains what cookies are, how we use cookies, how third-parties we may partner with may use cookies on the Service, your choices regarding cookies and further information about cookies.

What are cookies?

Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the Service or a third-party to recognize you and make your next visit easier and the Service more useful to you.

Cookies can be "persistent" or "session" cookies.

How we use cookies

When you use and access our website, we may place a number of cookies files in your web browser.

We use cookies for the following purposes: to enable certain functions of the website, to provide analytics, to store your preferences.

We use both session and persistent cookies on the website and we use different types of cookies to run the Service:

- Essential cookies. We may use essential cookies to authenticate users and prevent fraudulent use of user accounts.

Third-party cookies

In addition to our own cookies, we may also use various third-parties cookies to report usage statistics of the Service, deliver advertisements on and through the Service, and so on.

What are your choices regarding cookies

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.

Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

Where can you find more information about cookies?

You can learn more about cookies and the following third-party websites:

- All About Cookies: <http://www.allaboutcookies.org/>
- Network Advertising Initiative: <http://www.networkadvertising.org/>

Change of purpose

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

4) Disclosures of your personal data

We use a third party email provider, Campaign Monitor, to deliver our newsletter campaigns and store your email address and contact name. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve the newsletter.

Other than for our utilisation of Campaign Monitor we do NOT share your information with third parties, we do NOT share your email address with sponsors or any third parties, and we do NOT run exclusive 'sponsored' emails on behalf of third parties. We may, however, have sponsors or advertisers for emails you would otherwise be choosing to receive but will not send mails specifically for the purpose of advertising third parties or their products.

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

5) International data transfers

We share your contact data with Campaign Monitor strictly for the purposes of delivering our newsletter correspondence. This does involve transferring your data outside the European Economic Area (EEA).]

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring that

- When we use a third party provider, we use a specific contract approved by the European Commission which gives personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

6) Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

7) Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, requirements.

You can choose to opt out of our email newsletter at any time by visiting the contact us page on our website and completing the update profile contact form. There is also a link to update the contact information or request that your data is removed from our list on each edition of the newsletter we send out.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by [contacting us](#).

8) Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. At any time you may request the following

- Access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

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

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9) Glossary

LAWFUL BASIS

Legitimate Interest 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 data for our legitimate interests. We do not use your personal data 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 means processing your data 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 means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

Campaign Monitor – service provider for delivering email newsletter campaigns.

HM Revenue & Customs, regulators and other authorities [acting as processors or joint controllers] based [in the United Kingdom] [who require reporting of processing activities in certain circumstances].

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and 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.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. 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.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.