

# **Privacy Notice**





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#### 1.0 Introduction

Ecofficiency ("We", "Us", "Our") respects your privacy and is committed to protecting your personal data.

This privacy notice applies to the processing of your personal data when you visit our website <a href="www.ecofficiency.co.uk">www.ecofficiency.co.uk</a>, when you contact us by e-mail, post or telephone, when we subsequently provide services to you or when you are providing services to us..

#### 2.0 Definitions

In this policy, the following definitions will be used for the below terms:

"Data Protection Laws"	Means applicable law and regulatory requirements relating to the processing, privacy and use of personal data and protection of individuals, including, but not limited to.  i.Regulation (EU) 2016/679 ("GDPR")  ii.Regulation (EU) 2016/679 ("GDPR") as incorporated into domestic UK law by the European Union (Withdrawal Agreement) Act 2020 and amended by The Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit)
	Regulations 2020 (together the " <b>UK GDPR</b> ").  iii.any legislation enacted in the country of establishment of the data controller in respect of the protection of personal data or any corresponding or equivalent national laws or regulations.
	all as amended, updated, or replaced from time to time;

## 3.0 Our Contact Details

Name:	Ecofficiency Limited	Tel. No.	0800 030 5051
Address:	Armstrong House, 4-6 First Avenue Finningley Doncaster, DN9 3GA Registered Office: Kelsall House, Telford, TF3 3BD		enquiries@ecofficiency.co.uk gdpr@ecofficiency.co.uk

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**Ecofficiency Ltd.** Armstrong House, 4-6 First Ave, Finningley, Doncaster DN9 3GA **0800 030 5051 enquiries@ecofficiency.co.uk ecofficiency.co.uk** 



## 4.0 Type of Personal Data we collect

The personal data we currently collect may include the following:

- Contact details, including your name, job title, address, e-mail address and phone number
- Demographic information, such as postcode, preferences and interests
- Financial and credit card information
- IP address
- Website usage data, such as duration of visit, browser and operating system used, referrer URL, time of server request and content retrieved
- Information relevant to your enquiry
- Information pertaining to special offers and surveys
- Social media interactions

## 5.0 How we get your Personal Data and why we have it

Most of the personal data we process is provided to us directly by you for one of the following reasons, in accordance with a lawful basis described in Section 6:

- To fulfil any contracts entered into between you and us, including processing any payments.
- To provide you with information about our products and services that you request from us.
- To respond to an enquiry or request from us.
- You wish to attend, or have attended, an event.
- To send you promotional emails or mailings, or to call you, about products, services and offers that we think might be relevant to you.
- To contact you for market research purposes.
- To ask you to complete customer satisfaction surveys to assist us in improving our products and services.
- To subscribe to our newsletter.
- You have applied for a job or secondment with us.
- We also receive personal data indirectly when you visit our website, for the following reasons:
- To customise the website for you.
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- To administer the website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To make the site easier to visit again and more useful to you through the use of cookies.

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## 6.0 Why we share your information

We may share your information with third parties in the following scenarios:

- To provide goods or services to fulfil contractual obligations, for example, with transport, shipping or payment service providers.
- If we are obliged to do so by law, by court order or due to an enforceable official order.
- To enable other companies within the Reconomy Group to fulfil contractual obligations or provide information to you about similar products or services which you have requested, or which we think may be relevant for you, we will share your information with other companies within the Reconomy Group.
- To provide you, or permit carefully selected third parties to provide you, by telephone, post or email, with information about other goods and services that are similar to those that you have already purchased or enquired about.
- To provide you with targeted information about services or products, so you get relevant messages from us.

In the event that we transfer your personal data to a data processor, we will ensure that a data processing agreement (DPA) is in place

## 7.0 Lawful Basis for Processing

Under Data Protection Laws, the lawful bases we rely on for processing this information are:

- We have a contractual obligation: We process your personal data to fulfil contractual obligations.
- We have a legal obligation: We are obligated to retain certain information due to legal requirements, such as for tax and business regulations.
- We have a legitimate interest.

The legitimate interests can be our own interests or the interests of third parties. When necessary, we will conduct a Legitimate Interests Assessment, in order to consider the impact that any processing activities could have on individuals, including in the following scenarios:

- Promotion of our offers and services;
- Analysis of the use of our website;
- Social media engagement analysis;
- Ensuring the confidentiality and integrity of our IT systems; and
- Cooperation with authorities.
- You have given consent.

If you have given us explicit consent to process your personal data, we will process it within that scope and based on your consent. Your consent might refer to, for example, sending a newsletter. You can remove your consent at any time. You can do this by contacting Insert email.

## 8.0 How we store your Personal Data

We have implemented appropriate technical and organisational measures to protect your personal data against accidental or unlawful destruction, loss, unauthorised change or damage. All personal data we collect will be stored on

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our secure servers. All electronic transactions entered into via our website will be protected by SSL encryption technology.

We will store your personal information for as long as necessary to fulfil the purposes for which we collect the personal data, in accordance with our legal obligations and legitimate business interests.

We may retain any personal data to investigate or defend claims against us, or to prosecute or bring claims against you, us or any third party.

## 9.0 Your Data Protection Rights

Under Data Protection Laws, you have the following rights:

- Right of access: You have the right to ask us for copies of your personal information.
- Right to rectification: You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Right to erasure: You have the right to ask us to erase your personal information in certain circumstances, for example when the organisation no longer needs it for the original reason it was collected, or the organisation has collected or used your data unlawfully.
- Right to restriction of processing: You have the right to ask us to restrict the processing of your personal data in certain circumstances, for example the organisation no longer needs your personal data, but you want the organisation to keep it in order to create, exercise or defend a legal claim.
- Right to object to processing: You have the the right to object to the processing of your personal information in certain circumstances.
- Right to data portability: You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You can exercise your rights at any time by emailing us at Insert email, however there are certain circumstances when a request may be refused, for example when it is manifestly unfounded or excessive, for example when:

- the individual clearly has no intention to exercise their right of access.
- the request is malicious in intent and is being used to harass an organisation with no real purpose other than to cause disruption.
- the request is clearly or obviously unreasonable; the request should be proportionate when balanced with the burden or costs involved in dealing with the request.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

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## 10.0 EU and UK Representation

Where a UK-established Reconomy entity is processing and monitoring the personal data of individuals in the EU, and is required by Data Protection Laws to designate an EU Representative, the following person is hereby appointed:

Managing Director Cycleon B.V. Vliegend Hertlaan 71 14e etage 3526 KT Utrecht Netherlands Tel: +31 30 299 5500

Where an EU-established Reconomy entity is processing and monitoring the personal data of individuals in the UK, and is required by Data Protection Laws to designate a UK Representative, the following person is hereby appointed:

Company Secretary Reconomy (UK) Limited Kelsall House Stafford Court Stafford Park 1 Telford Shropshire TF3 3BD UK Tel: 0800 988 5618 Email: gdpr@reconomy.com

## 11.0 Lodging a Complaint

If you are dissatisfied with our actions and wish to make a complaint, this should be made in writing to <a href="mailto:gdpr@ecofficiency.co.uk">gdpr@ecofficiency.co.uk</a> or sent to the following address: Ecofficiency Limtied, Armstrong House, 4-6 First Avenue, Finningley, Doncaster, DN9 3GA

If you would like to make a complaint to the Reconomy Group, email qdpr@reconomy.com.

You also have the right to lodge a complaint with your local Supervisory Authority ("SA") if you are unhappy with how we have used your data. A list of EU SAs is maintained by the European Data Protection Board (EDPB) and can be accessed here.

The ICO's address: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire

SK9 5AF

Helpline number: 0303 123 1113 or 01625 545 745 or email: <a href="mailto:enquiries@ico.org.uk">enquiries@ico.org.uk</a> ICO website: <a href="https://www.ico.org.uk">https://www.ico.org.uk</a>

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# 12.0 Changes to our Privacy Notice

Any changes we make to our Privacy Notice in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy Notice.

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