



## **Privacy policy**

### **1. Introduction**

- 1.1 We are committed to safeguarding the privacy of our clients/employees/systems and suppliers.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our employees and clients/suppliers, in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website/systems. Insofar as those cookies are not strictly necessary for the provision of our website/system and services, we will ask you to consent to our use of cookies when you first visit our website/systems.
- 1.4 We will/have sent out an e-mail to all our clients and suppliers asking them to return an e-mail to Harpers if they positively consent to be kept on our databases and to specify whether they would like to receive direct communications and/or limit the publication of their information.
- 1.5 In this policy, "we", "us" and "our" refer to our data controller

### **2. How we use your personal data**

First and foremost, we use your personal data to operate our business and provide you with any services you've requested, and to manage our relationship with you. We also use your personal data for other purposes, which may include the following:

**To communicate with you.** This may include:

- providing you with information you've requested from us (like planning waste collection or disposal of waste or Industrial cleaning requirements, training or materials) or information we are required to send to you
- operational communications, like changes operating addresses or changes in disposal sites or adding you to our websites as a reference for other potential advisors to see and clarify Harpers work if required.
- marketing communications (about Harpers Environmental limited or another product or service we think you might be interested in) in accordance with your marketing preferences
- asking you for feedback or to take part in any research we are conducting (which we may engage a third party to assist with).

### **To support you**

2.1 We may process your account data. The account data may include your name and email address, work site, disposal site address or both and personal information for work tasks such as contact details of client and suppliers staff at their work place. The account data may be processed for the purposes of operating and billing purposes, in providing our services. This data will be stored on our data system and backed up regularly so we can continue to communicate with you.



The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our systems / business.

- 2.2 We may process your personal data that is provided in the course of the use of our services. The service data may be processed for the purposes of operating our Business / Systems, in providing our services, ensuring the security of our website/systems and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our systems and business.
- 2.3 We may process information contained in any enquiry you submit to us regarding goods and/or services. The enquiry data may be processed for the purposes of offering our services, marketing and selling our services to you. The legal basis for this processing is consent.
- 2.4 We may process information relating to our customer relationships, including customer contact information. The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers. The legal basis for this processing is consent OR our legitimate interests, namely the proper management of our customer relationships.
- 2.5 We may process information relating to transactions, including purchases of goods for work and services that we provide, that you enter into with us and/or through our systems. The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the services Harpers provide for their clients or purchased goods for those services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of your data for business use.
- 2.6 We may process information that you provide to us for the purpose of subscribing to our email business notifications and/or newsletters. The notification data may be processed for the purposes of sending you the relevant business notifications and/or newsletters. The legal basis for this processing is consent OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.7 We may process information contained in or relating to any communication that you send to us. The correspondence data may include the communication content and metadata associated with the communication. Our system will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests,



namely the proper administration of our website and business and communications with users.

We may process:

**Identity Data** - This includes: first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

**Contact Data** - This includes: billing address, delivery address, email address and telephone numbers.

**Financial Data** - This includes: bank account and payment card details.

**Transaction Data** - This includes: details about payments to and from you and other details of products and services you have purchased from us.

**Technical Data** - This includes: 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. This kind of data forms the basis of some kinds of cookies (see Cookies section at the end of this policy)

**Profile Data** - This includes: your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

**Usage Data** - This includes: information about how you use our website, products and services. This kind of data forms the basis of some kinds of cookies (see Cookies section at the end of this policy)

**Marketing and Communications Data** - This includes: your preferences in receiving marketing from us and our third parties and your communication preferences.

**Personal Data from Publicly Available Sources** - This includes: information that you have shared on a publicly available platform (e.g. such as a public Facebook page).

The legal basis for this processing is consent OR our legitimate interests, OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

2.8 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

2.9 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or



obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

- 2.10 In addition to the specific purposes for which we may process your personal data, we may also process any of your personal data where such processing 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.
- 2.11 Please do not supply any other person's personal data to us, unless we prompt you to do so.

### **3. Providing your personal data to others**

- 3.1 We may disclose your personal data to any member of our company insofar as reasonably necessary for the purposes of daily works and managing the business, and on the legal bases, set out in this policy
- 3.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 3.3 Financial transactions relating to our internal systems and services are OR may be handled by our payment services providers (Bank). We will share transaction data with our payment services providers 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.
- 3.4 We may disclose your enquiry data to one or more of those selected third party suppliers of goods and services identified through discussions at early planning stages. Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.
- 3.5 In addition to the specific disclosures of personal data, we may 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. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

### **4. Retaining and deleting personal data**

- 4.1 This Section 4 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.



4.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

4.3 We will retain your personal data for a maximum period of 6 years following the end of our contract with you. We may hold your information for longer if required by applicable laws.

4.4 Notwithstanding the other provisions of this Section 4, we may retain your personal data where such retention 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.

## **5. Amendments**

5.1 We may update this policy from time to time by publishing a new version on our website/systems.

5.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

5.3 We will notify you of significant changes to this policy by email or through the website/systems.

## **6. Your rights**

6.1 In this Section 6, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

6.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

6.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data.



- 6.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 6.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- 6.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 6.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 6.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 6.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 6.10 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or



(b) that the processing is necessary for the performance of a contract/work streams to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

6.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

6.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

6.13 You may exercise any of your rights in relation to your personal data by written notice to us or opting out of any website/systems in addition to the other methods.

## **7. About cookies**

7.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

7.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

7.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **8. Cookies that we use**

8.1 We use cookies for the following purposes:

- (a) authentication - we use cookies to identify you when you visit our website and as you navigate our website/systems.
- (b) status - we use cookies to help us to determine if you are logged into our website/systems.
- (c) personalisation - we use cookies to store information about your preferences and to personalise the website/systems for you.





- (d) security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website/systems and services generally.
- (e) advertising - we use cookies to help us to display advertisements that will be relevant to you.
- (f) analysis - we use cookies to help us to analyse the use and performance of our website/systems and services.
- (g) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

## **9. Cookies used by our service providers**

- 9.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website/systems.
- 9.2 We use Google Analytics to analyse the use of our website (third Party). Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

## **10. Our details**

10.1 You can contact us:

- (a) by post - please visit our website for contact details;
- (b) using our website or system contact form;
- (c) by telephone, on the contact number published on our website from time to time; or
- (d) by email, using the email address published on our website from time to time.

## **11. Data protection officer**

- 11.1 Our data protection officer's contact details are: Mark Bristow - contactable at: [mark.bristow@harpersenvironmental.co.uk](mailto:mark.bristow@harpersenvironmental.co.uk)
- 11.2 If you would like to contact a supervisory authority for any reason in relation to the above, please contact the Information Commissioner's Office (ICO) [here](#).