

## General Data Protection Regulations Policy

### | CPSPLG006 v 1.3

#### Overview

Electrical Waste Recycling Limited T/A Waste Experts (Waste Experts) is committed to compliance with the General Data Protection Regulations (GDPR) – in relation to use of personal information and protection of company data as well as acceptance of data bearing devices from our customers which are collected for destruction. The Company collects and uses information about people with whom it communicates. Personal information in either paper or electronic form is covered by this policy.

Waste Experts have strict protocols for accessing data and staff only have access to the data required to perform their given role. Waste Experts have invested time and resource to ensure that our staff are familiar with GDPR compliance.

In line with our IT provider CEF, there are a suite of security policies and technical controls to ensure secure practices are implemented for the safe processing and storage of data, including but not limited to:

- Encryption on all laptops and tablets, if data is ever processed on these devices, it will remain secure if our equipment is ever lost or stolen.
- Multiple factor authorisation is required on all devices.
- Access control on all systems has unique logins and complex passwords. Closely controlled administrator passwords, held in an encrypted auditable vault, that are only known or accessible to authorised individuals. Data between offices flows over encrypted VPN IPsec tunnels or remotely over TLS/SSL.
- Disposal of all IT equipment and paper is handled in house within our Huddersfield facility under our Secure Disposal provision.

## Principles

Waste Experts work to the 6 principles set out by the Information Commissioner's office.

Personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency').
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation').
3. Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed and for the specific purpose for which it was collected ('data minimization').
4. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased, or rectified without delay ('accuracy').
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation').
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

Waste Experts hold personal information on employees and customers. All personal information is processed only with a valid lawful basis.

## **Employees:**

We collect personal information under the following Lawful Basis

1. Contract – we hold personal information for contract and payroll purposes.
2. Legal Obligation – we hold information from Driver Tachographs, right to work in the UK to comply without regulatory obligations.
3. Legitimate Interests – we hold personal information regarding Emergency contact information, driver behaviour, and test results to comply with Health and Safety and compliance legislation and to look after the wellbeing of all employees.
4. Consent – further personal information will be used only with consent of employees.

## Customers

We collect personal information under the following Lawful Basis

1. Contract – we hold personal information to identify you and manage accounts held with us, to process orders and obtain payment.
2. Legal Obligation – we hold and store regulatory paperwork to meet both our and your obligations under relevant environmental regulations, which includes sharing collection data with the Regulatory bodies for the UK.
3. Consent – we may hold and process your personal information for marketing purposes, to improve the quality of our service to you and to conduct research, statistical analysis, and behavioural analysis. You have the option to be excluded from our marketing process.

## General

We operate CCTV at our sites; your image could be recorded by our security cameras; data is held for 60 days unless it is being used to investigate an alleged crime or incident. In cases of this nature, it may be retained for up to 2 years following the end of the investigation. In serious cases the footage may be supplied to the UK Authorities at their request.

Details supplied as a visitor, driver, or contractor on site, will be updated every 12 months/visit whichever is the sooner, and completed induction forms are retained for 12 months.

Personal data may be held on devices collected from customer sites brought into our facility for treatment. Such devices are identified and held within our secure ITAD area until processed. Under no circumstances will this data be accessed. Only personnel who are trained and have the correct clearance can access the unit and work on the data. Devices are shredded under controlled conditions unless explicit permission has been granted for data wiping and re-use of the items.

## Your Rights

The right to access your personal information held by us – at any point you can contact us to request the information and why we have the information. All requests must be in writing, and we will respond within 30 days.

The right to correct and update the information held by us – If the data we hold is out of date, incomplete or incorrect.

The right to have your information erased – if you feel that we should no longer be using or data, or we are doing so without a valid lawful basis, you can request that we erase the data we hold. We will confirm that this has been erased or inform you of the reason why it cannot be erased.

The right to object to processing of your data – you have the right to request that we stop processing your data. We will contact you to advise if we have legitimate reasons to continue to process your data. If data is no longer processed it may still be held to comply with other rights.

The right to data portability – you have the right to request that we transfer your data to another data controller, on receipt of your request, we will comply where it is feasible to do so.

Consent – in those cases where we need your consent to hold your information, we will ask you to check a box on any form requiring consent. By checking these boxes, you are stating that you have been informed as to why we are collecting the data, and rights in relation to this policy.

Where an external customer or supplier requires personal data relating to an employee, e.g. for security clearance. A request for personal employee information <https://forms.office.com/r/2ErX481B0J> is required to be completed before information will be provided. Employees must understand why their information is required and how it will be used.

## VERSION CONTROL

Version	Date	Author	Approver	Change Description
1.0	27/7/2020	J Richardson	S Donaghey	New Policy for GDPR
1.1	9/9/2020	J Richardson	S Donaghey	Updated to new format
1.2	4/9/2023	J Richardson	S Donaghey	Reviewed and updated
1.3	31/01/2025	S Heagney	S Donaghey	Rebrand