

Wiser Ltd trading as Wiser Recycling/ Wiser Bins is committed to protecting and respecting your privacy. We adhere to this Privacy Notice (the “Notice”) which together with any disclaimers sets out the basis on which any personal data relating to you (“Data”) we collect from you (or that you provide to us, or that is provided to us) by any means will be processed. Please read the following carefully to understand our use of Data. Please note that the Notice relates only to living individuals in relation to Data relating directly to themselves, and not to persons in any other capacity.

This Privacy Notice is provided to you, in line with the following Personal Data Protection Legislation:

The Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 also known as the General Data Protection Regulation (GDPR), which became enforceable across the EU and the EEA from May 25th, 2018, having replaced the previous Directive 95/46/EC; In Ireland, the national law, which amongst other things, gives further effect to the GDPR, is the Data Protection Act 2018 (‘the 2018 Act’).

For the purpose of the Data Protection Laws:

Wiser Ltd is data controller as an employer, as a service provider, and when dealing with suppliers.

If you have any questions in relation to this Privacy Notice, or wish to exercise your rights relating to it, please contact us at [privacy@wiserbins.ie](mailto:privacy@wiserbins.ie).

### **Information we may collect from you.**

We collect Data from you which you volunteer when you provide such Data to us, or via our services with which you interact. We may also be given other Data relating to you by other persons, or we may obtain such other Data about you as may be provided to us in the course of our legitimate business activities.

We may collect and process Data; including the following while providing services to you, which could contain your Data:

Your full name; your address; your various email addresses; your various phone numbers including mobile phone numbers; your contract data including your contractual relationship, product and/or contractual interests, price plans, customer history etc; planning control data, precise location data of your bins, cctv images: waste type, number of bin lifts by type, bin weights by type,; customer balance, customer transactions; your nationality; your address; financial information about you, including your bank account details, credit card details, direct debit, IBAN or other payment details; details of contracts you have entered with third parties for us to provide services to you, post card ID; details of your driving licence; and details of your passport. We may require you to provide certain financial information (like your bank account or credit card information) in order to facilitate the processing of payments and all other Data which you ask us to process on your behalf, or which is necessary for us to process in order for us to fulfil our role as providing to you.

We may also process other data, which is not personal data.

When you access our website your device’s browser provides us with information such as your IP address, browser type, access time and referring URL which is collected and used to compile statistical data. This information may be used to help us to improve our website and the services we offer, and to offer services to you.

### **Security and where we store your Data.**

We are committed to protecting the security of your Data. We use a variety of security technologies and procedures to help protect your Data from unauthorised access and use. As effective as modern security practices are, no physical or electronic security system is entirely secure. We cannot guarantee the complete security of our databases, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. We will continue to revise policies and implement additional security features as new technologies become available.

The transmission of information via the internet is not completely secure and may involve the transfer of data to countries outside of the European Economic Area (EEA). This occurs typically through use of cloud solutions for web hosting, email hosting or proprietary software solutions delivered to us through the Cloud. We do not however authorise any third party to use your Data for their own purposes. Non-EEA countries may not provide an adequate level of protection in relation to processing your Data. By submitting your data, you agree to this transfer, storing and processing.

Although we will do our best to protect your Data, we cannot guarantee the security of your Data transmitted to us. Any transmission of data is at your own risk. Once we receive your Data, we use appropriate security measures to seek to prevent unauthorised access.

#### **Uses made of your Data.**

We use your Data that we hold to:

- In our legitimate interest of advertising our services, provide you with information, products or services that you request from us or which we feel may interest you, or where you have consented to be contacted for such purposes.
- carry out our obligations arising from any contracts entered into between you and us.
- in our legitimate interest of advertising our services, provide details of any loyalty scheme or promotion.
- comply with legislation.
- notify you about changes to our services; and/or
- to process Data to take steps at your request prior to entering into a contract with you. We may also need to process Data to enter into a contract with you. In some cases, we need to process Data to ensure that we are complying with our legal obligations.

We provide refuse and compost waste, and recycling waste and general waste collection and disposal services.

We may use your data to send you information relating to our services, events and products which may be of interest to you. If you do not want us to use your data in this way, please notify us to that effect, at [privacy@wiserbins.ie](mailto:privacy@wiserbins.ie).

We keep your Data for as long as is necessary for the performance of the contract between you and us and to comply with our legal obligations. If you no longer want us to use your Data to provide this service to you, you can request that we erase your Data and close your account with us. Please note that if you request the erasure of your Data:

- We may retain some of your Data as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety.
- We may retain and use your Data to the extent necessary to comply with our legal obligations. For example, we may keep some of your information for tax, legal reporting, and auditing obligations.
- Because we maintain our records to protect from accidental or malicious loss and destruction, residual copies of your Data may not be removed from our backup systems for a limited period of time.

### **Disclosure of your information**

We may disclose your Data to third parties who provide a service to us or in the event that we sell or buy any business or assets, in which case we may disclose your Data to the prospective seller or buyer of such business or assets or if we are under a duty to disclose or share your Data in order to comply with any legal obligation, or to protect our rights, property, or safety of staff or customers. Currently we disclose your Data to the following providers.

We may share your personal data with provide you with our services. For example, our web hosting provider and our IT service providers.

In addition, we may disclose your personal information to third parties If we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect our rights, property, or safety, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We may share your information with selected third parties including:

Business partners, suppliers, and sub-contractors for the performance of any contract we enter into with them or you.

Third parties with whom: (i) we need to share your information to facilitate transactions you have requested, and (ii) you ask us to share your information.

Statutory and regulatory bodies (including central and local government) and law enforcement authorities in order to comply with any applicable laws, grant applications and / or court orders.

Service providers who provide a service to us, and sub processors

### **Do we transfer your information outside the European Union or European Economic Area?**

We will, from time to time, make use of services provided by 3rd parties for the delivery of our services which may necessitate the transfer of personal data outside the EU/EEA. For example, we use a variety of cloud-based tools. Where data needs to be transferred or processed outside the EU/EEA, we chose providers who process data on the basis of

Standard Contract Clauses(SCC's)

An Adequacy Decision from the European Commission.

### **Miscellaneous**

We do not conduct profiling.

Where we process your Data based only on your consent, you may withdraw your consent.

You have the right to bring a complaint to a supervisory authority if you have any complaints about the processing of your Data. In Ireland the Data Protection Commission is the supervisory authority.

In circumstances where the provision of your Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, we will advise you at the point of collecting your Data whether the Data is a required field, and the consequences of not providing the Data.

Where the Data is not provided by you, we will set out what the categories of Data are, and where we obtained the Data here.

### **Google Maps**

We use Google Maps for route planning and collection purposes.

### **Payments**

We may need to collect the following information, as it is necessary for the adequate performance of the contract with you and to comply with applicable law (such as anti-money laundering regulations).

- **Payment Information.** When you make payments, we require certain financial information (like your bank account or credit card information) in order to process payments and comply with applicable law.
- **Identity Verification and Other Information.** We may require identity verification information, in order to verify your identity and comply with applicable law.

### **How we use the payment data collected**

- Enable you to pay for our products and services.
- Detect and prevent fraud, abuse, security incidents, and other harmful activity.
- Conduct security investigations and risk assessments.
- Conduct checks against databases and other information sources.
- Comply with legal obligations (such as anti-money laundering regulations).
- Enforce our payment terms.

We process this information in our legitimate interest in providing goods and services and where it is necessary for the adequate performance of the contract with you and to comply with applicable laws.

## **Digital Marketing**

If you are not a customer, you may still opt to receive communications from us which we consider may be of interest to you, by any of the following methods: newsletter, email, SMS text message, social media, and phone calls. You will be asked to opt-in if you wish to receive these. If you wish to be removed from our list (opt-out), at any time, you can do so by clicking on the unsubscribe link at the bottom of each email communication you receive from us. You can also opt out by contacting us at [privacy@wiserbins.ie](mailto:privacy@wiserbins.ie)

## **Business Transfers.**

If Wiser Ltd undertakes or is involved in any merger, acquisition, reorganization, sale of assets, bankruptcy, or insolvency event, then we may sell, transfer, or share some or all of our assets, including your Data in connection with such transaction or in contemplation of such transaction (e.g., due diligence).

## **Links to other sites**

Our website may, from time to time, contain links to and from other websites. If you follow a link to any of those websites, please note that those websites have their own privacy policies and that we do not accept any responsibility or liability for those policies. Please check those policies before you submit any data to those websites.

## **Your rights**

As an individual, under EU law you have certain rights to apply to us to provide information or make amendments to how we process data relating to you. These rights apply in certain circumstances and are set out below: -

1. The right to access data relating to you ('access right').
2. The right to rectify/correct data relating to you ('right to rectification').
3. The right to object to processing of data relating to you ('right to object').
4. The right to restrict the processing of data relating to you ('right to restriction').
5. The right to erase/delete data relating to you (i.e., the "right to erasure"). and
6. The right to 'port' certain data relating to you from one organisation to another ('right to data portability').

portability').

Please note that these rights are not absolute and will be subject to a case-by-case analysis.

You have the right to make a complaint regarding the processing of your personal data to the Data Protection Commission, the Irish supervisory authority for data protection issues (<http://gdprandyou.ie/contact-us/>). Hopefully though, you will give us the chance to listen and address your concerns before you approach the Irish DPC. So, should you have any concerns or questions regarding the processing of your personal data, please let us know by contacting our Privacy Lead on [privacy@wiserbins.ie](mailto:privacy@wiserbins.ie)

Where our processing of your personal data is based on your consent to that processing, you have the right to withdraw that consent at any time but any processing that we have carried out before you withdrew your consent remains lawful.

If you are receiving marketing from us, you may opt out. If you no longer wish to be contacted for marketing purposes, please contact us as set out at the end of this Notice to request to "opt out" of marketing.

The exercise of Data Subjects' rights as some other "interactions" requires the univocal identification of the person submitting such request as being, in fact, the Data Subject to whom such Personal Data pertains to, hence we may have to set in place a process or mechanism that allows it to document having undergone such assertive identification.

### **Other websites**

Our website contains links to other websites. This Privacy Notice only applies to Wiser Ltd.'s website so when you link to other websites you should read their own Privacy Policies/Notices.

### **Changes to this Notice**

We reserve the right to change this Notice from time to time in our sole discretion. If we make any changes, we will post those changes here so that you can see what information we gather, how we might use that Data and in what circumstances we may disclose it. By continuing to use our site or our services or otherwise provide Data after we post any such changes, you accept and agree to this Notice as modified.

### **Contact Us**

Questions, comments, requests and complaints regarding this Notice and the information we hold are welcome and should be addressed to [privacy@wiserbins.ie](mailto:privacy@wiserbins.ie).

All requests will be dealt with promptly and efficiently.

This Privacy Notice will take effect as in from 29<sup>th</sup> June 2021.