

NEALES WASTE MANAGEMENT LTD PRIVACY NOTICE (EXTERNAL)

NWM Holdings Ltd and any of its subsidiaries including Neales Waste Management Limited and Quercia Ltd ("Neales", "Quercia" "we", "us") is committed to protecting the privacy and security of those with whom we interact. We recognise the need to respect and protect information that is collected or disclosed to us (called "Personal Information" as explained below).

This notice is intended to tell you how we collect and use your personal information during and after your relationship with us, in accordance with applicable Data Protection Laws.

1 WHO WE ARE

Neales is a well-established waste recycling business within the North West focussing on hazardous waste. Established in 1991 it is our aim to offer an excellent service for our customers, resulting in safe, fair and professional services at all times.

Neales is committed to handling data fairly, lawfully and in a transparent manner, and takes its data protection obligations seriously. Neales ensures that it processes Personal Information in compliance with applicable data protection laws, including, without limitation, the General Data Protection Regulation 2016/679 ("GDPR"). Neales is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection laws to notify you of the information contained in this Privacy Notice.

2 WHAT IS PERSONAL INFORMATION AND WHAT PERSONAL INFORMATION DOES NEALES COLLECT ABOUT YOU?

For the purposes of this Privacy Notice "**Personal Information**" consists of any information that relates to you and/or information from which you can be identified, directly or indirectly. For example, information which identifies you may consist of your name, address, email address, telephone number, photographs, location data, an online identifier (eg cookies identifiers and your IP address) or one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity. When we combine other information (ie information that does not, on its own, identify you) with Personal Information, we treat the combined information as Personal Information.

We may collect use, store and transfer different kinds of Personal Information about you including your name, contact details, medical and healthcare information, bank details, time sheet information, employment history, driving licence and passport, gender, disciplinary and grievance information, performance information, recruitment information, criminal offence data, race, ethnicity, religious beliefs, location of employment or workplace, employer's details, compensation history, photographs and video images.

3 HOW IS YOUR PERSONAL INFORMATION COLLECTED?

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

3.1 Personal Information you provide directly

You may give us your contact, identification details and financial data (such as your name, home address, telephone number and bank account information) by filling in forms or corresponding with us by phone, email, post or otherwise. As part of our ongoing health surveillance and monitoring obligations, we may also collect information relating to your health via third party specialists that we instruct such as OHI Ltd.

3.2 Automated technologies or interactions

In some cases, we may collect information about your computer, including your IP address, operating system and browser type. We collect this personal data by using cookies, server logs and other similar technologies.

3.3 Third parties or publicly available sources

We may also receive personal data about you from various third parties and public sources, such as Companies House, analytics providers such as Google and background check providers.

3.4 Surveillance

We may capture photographs or video images of you by way of CCTV in operation throughout Neales' controlled sites and offices. Please refer to Appendix 1.

4 **HOW DO WE USE YOUR INFORMATION?**

We may use the Personal Information we collect for:

- recruitment and entitlement to work in the UK (see section 13 for more information);
- providing services;
- analysis purposes;
- customer support;
- service improvement;
- general business purposes;
- carrying out our legal obligations;
- prevention of accidents on Neales' controlled sites;
- for training and quality purposes;
- internal record keeping in compliance with the GDPR; and
- marketing, sales and promotional plans including updating and maintaining our client relationship management system (see section 12 for more information).

The law allows us to use the Personal Information as set out above on the basis that the processing is necessary in the following circumstances:

- on the basis that we are acting in our "legitimate interests", for example, for the purposes of effective business management;
- where we need to comply with a legal obligation; or
- more rarely, we may need to use your Personal Information in order to protect your vital interests, for example we may need to disclose information regarding your health to a hospital in the event of a medical emergency.

Marketing Communications

Neales may use your Personal Information to provide you with email notifications and other communications, including surveys, by telephone or post on the basis that such use is necessary for the purposes of the legitimate interests pursued by us, or in the case of your email notification subscription, in order for us to perform our contract with you. For further information on this, see the 'Your Choices' section of this Privacy Notice at paragraph 12.

Social Media, Promotional Material and Publications

We may use your Personal Information, including photographs, film and quoted statements taken at organised events, on site or on Neales' internal and external communications, including for example on Neales' website and published articles. We may also use the same information to promote Neales'

activities on social media platforms such as Twitter, Facebook and LinkedIn. Use of your Personal Information, including photographs and film containing your image for this purpose is on the basis of Neales' legitimate interest in promoting and advertising its business.

Should you not wish for photographs or film containing your image or quoted statements (or other Personal Information) to be used for this purpose then you have a right to object to this processing. Please contact the Neales Privacy Team (gdpr@neales-waste.co.uk) to exercise this right or for more information.

However, please be aware that once an article or promotional material is published and in circulation (for example in a brochure or a Tweet) it may be copied and used by others. If you ask us not to use the photograph, film or quoted statements in future, we will comply with your request and we will do our best to stop others doing so, but we cannot guarantee this.

We will make efforts to notify you when photography and/or filming for this purpose is taking place at an event or on site where it is likely that such images will be posted internally or externally.

Combining Personal Information

We may combine the Personal Information that we collect from you (including information received from our affiliates) to the extent permitted by applicable law.

It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes during your relationship with Neales.

5 TO WHOM DO WE DISCLOSE YOUR INFORMATION AND WHAT DO WE DO TO KEEP YOUR INFORMATION SECURE?

We will only use your Personal Information for our internal business purposes, some of which are mentioned above. We do not sell any of your Personal Information to third parties. However, we may disclose your information to service providers, email support services, regulators, HMRC, legal teams, accountants and actuaries, to our public authority clients for the purposes of key performance indicator reporting and to all parts of the Neales Group.

We have put in place appropriate physical and technical measures to safeguard the Personal Information we collect in connection with our Services. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Information on our instructions and they are subject to a duty of confidentiality. However, please note that although we take appropriate steps to protect your Personal Information, no website, product, device, online application or transmission of data, computer system or wireless connection is completely secure and therefore we cannot guarantee the security of your Personal Information.

6 INTERNATIONAL TRANSFER OF DATA

The Personal Information that we collect from you may be stored and processed in your region, or transferred to, stored at or otherwise processed outside the European Economic Area ("EEA"), including but not limited to Italy and Turkey or in any other country where Neales or Neales Affiliates, subsidiaries or service providers maintain facilities. By using or participating in any Service and/or providing us with your Personal Information, you acknowledge that we may collect, transfer, store and process your information outside of the EEA. We will take all steps reasonably necessary to ensure that your Personal Information is kept secure and treated in accordance with this Privacy Notice and the requirements of applicable law wherever the data are/is located. Where we transfer your Personal Information outside the EEA to other countries, we will ensure that appropriate transfer agreements and mechanisms (such as the EU Model Clauses) are in place to help ensure that our third party service providers provide an adequate level of protection to your Personal Information. We will only transfer your Personal Information outside the EEA in accordance with applicable laws or where you have given us your consent to do so.

7 DATA RETENTION – HOW LONG WE WILL STORE/KEEP YOUR PERSONAL INFORMATION

Neales retains Personal Information for as long as necessary to fulfil the purposes for which your Personal Information has been collected as outlined in this Privacy Notice unless a longer retention period is required by law. When your Personal Information is no longer required for the purpose it was collected or as required by applicable law, it will be deleted and/or returned to you in accordance with applicable law.

8 ACCESSING YOUR PERSONAL INFORMATION AND OTHER RIGHTS YOU HAVE

Neales will collect, store and process your Personal Information in accordance with your rights under any applicable Data Protection Laws. Under certain circumstances, you have the following rights in relation to your Personal Information:

- 8.1 **Subject Access** - you have the right to request details of the Personal Information which we hold about you and copies of such Personal Information.
- 8.2 **Right to Withdraw Consent** – where our use of your Personal Information is based upon your consent, you have the right to withdraw such consent at any time. In the event you wish to withdraw your consent to processing, please contact us using the details provided below.
- 8.3 **Data Portability** – you may, in certain circumstances, request us to port ie transmit your Personal Information directly to another organisation.
- 8.4 **Rectification** – we want to ensure that the Personal Information about you that we hold is accurate and up to date. If you think that any information we have about you is incorrect or incomplete, please let us know. To the extent required by applicable laws, we will rectify or update any incorrect or inaccurate Personal Information about you.
- 8.5 **Erasure ('right to be forgotten')** - you have the right to have your Personal Information 'erased' in certain specified situations.
- 8.6 **Restriction of processing** – you have the right in certain specified situations to require us to stop processing your Personal Information and to only store such Personal Information.
- 8.7 **Object to processing** – You have the right to object to specific types of processing of your Personal Information, such as, where we are processing your Personal Information for the purposes of direct marketing.
- 8.8 **Prevent automated decision-taking** – in certain circumstances, you have the right not to be subject to decisions being taken solely on the basis of automated processing.

9 ENFORCING YOUR RIGHTS

If you wish to enforce any of your rights under applicable Data Protection Laws, then please contact us at gdp@neales-waste.co.uk. We will respond to your request without undue delay and no later than one month from receipt of any such request, unless a longer period is permitted by applicable Data Protection Laws, and we may charge a reasonable fee for dealing with your request which we will notify to you. Please note that we will only charge a fee where we are permitted to do so by applicable Data Protection Laws.

Complaints

If you are concerned that we have not complied with your legal rights under applicable Data Protection Laws, you may contact the Information Commissioner's Office (www.ico.gov.uk) which is the data protection regulator in the UK which is where Neales is located. Alternatively, if you are based outside the UK, you may contact your local data protection supervisory authority.

10 **THIRD-PARTY LINKS AND PRODUCTS ON OUR SERVICES**

Our websites, applications and products may contain links to other third party websites that are not operated by Neales, and our websites may contain applications that you can download from third parties. These linked sites and applications are not under Neales' control and as such, we are not responsible for the privacy practices or the content of any linked websites and online applications. If you choose to use any third party websites or applications, any Personal Information collected by the third party's website or application will be controlled by the Privacy Notice of that third party. We strongly recommend that you take the time to review the privacy policies of any third parties to which you provide Personal Information.

11 **COOKIES**

What are cookies?

Neales may use cookies and other technologies, including web beacons, action tags, pixel tags, in certain areas of our Services. Cookies are small text files that can be read by a web server in the domain that put the cookie on your hard drive. Cookies are assigned to and stored in a user's internet browser on a temporary (for the duration of the online session only) or persistent basis (cookie stays on the computer after the internet browser or device has been closed). Cookies collect and store information about a user's preferences, product usage, content viewed, and registration information which allows for Neales to provide users an enhanced and customised experience when engaging with our products. We may use cookies to store your preferences and settings, provide targeted ads, and analyse site operations.

12 **YOUR CHOICES (EG MARKETING RELATED EMAILS OR OTHERWISE)**

Neales may use your Personal Information (such as your contact details (eg name, address, email address, telephone number) to send you marketing-related correspondence by email, post or telephone call related to our products, in accordance with your email and contact preferences held on file as you otherwise agree to. When we process your Personal Information for marketing purposes, we do so on the basis that it is in our legitimate interests to do so, or in the case of our email notification service, that it is necessary to perform our contract with you. You have a right to object to this processing. If you wish to do so, please contact the Privacy Team by email: gdp@neales-waste.co.uk

We may store information that you provide for the purposes of updating and maintaining our client relationship management system.

We do not share Personal Information with third parties for the third parties' marketing purposes.

We may also use your Personal Information to personalise and to target more effectively our marketing communications to ensure, to the extent possible, that any marketing-related correspondence is relevant to you.

To opt out of receiving marketing-related correspondence from Neales, please email us at gdp@neales-waste.co.uk with "Unsubscribe" in the subject title.

13 **CAREERS AND JOB APPLICANTS, CURRENT AND FORMER NEALES EMPLOYEES**

All of the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

Neales will not share any of the information you provide during the recruitment process with any other third parties for marketing purposes. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format. In addition, if you provide special category data eg ethnicity as part of your application we will process this

information for reasons of substantial public interest to monitor equality of opportunity or treatment only and will not be used in our decision-making process. As set out in our Equality Opportunities policy, Neales has a legitimate interest in ensuring that every individual is treated with fairness and respect and has access to equal opportunities, regardless of who they are.

We will use the contact details you provide to us to contact you to progress your application. We may also use the other information you provide (where relevant) to assess your suitability for the role you have applied for.

14 **CHANGES TO THIS PRIVACY NOTICE**

It is also important that you check back often for updates to the Privacy Notice, as we may change this Privacy Notice from time to time. The “Date last updated” legend at the bottom of this page states when the Privacy Notice was last updated and any changes will become effective upon our posting of the revised Privacy Notice.

We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. We will provide this notice by email or by posting notice of the changes on our website or through any relevant Services.

15 **CONTACT US / FURTHER INFORMATION**

If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact the Data Processor using the details set out below.

Postal Address: The Data Processor, Neales Waste Management Ltd, 501 Green Place, Walton Summit Centre, Bamber Bridge, Preston, Lancashire, PR5 8AY

Email address: gdpr@neales-waste.co.uk

If you have any questions regarding the collection, processing, or use of your Personal Information or if you wish to correct, block, rectify, object, access, revoke your consent to any applicable aspect of this Privacy Notice or delete any of your Personal Information, please contact us.

Date last updated: October 2020

APPENDIX 1

Guide Security System ("Guide"), as our approved CCTV systems provider, acts as data processor for Neales but does not hold any Personal Information such as name, contact details, etc. Neales is the data controller which means that we are responsible for deciding how we hold and images/ recordings held in relation to your interactions with Guide.

This Appendix explains how we collect and use images and/or recordings during and after your interactions on a Neales site.

What images and recordings are collected and how is used?

Images may be collected by Guide by way of photographs and/or video recordings.

As stated in section 7 of this Privacy Notice, you have a right to access your Personal Information, including images and recordings, held as a result of your interactions with a Neales site. To exercise your data subject rights please contact the Privacy Team by email: gdpr@neales-waste.co.uk

How do we use captured images/recordings?

CCTV

Photographs and images of you may be captured during the operation of CCTV at our sites. Neales acknowledge that you have an expectation of privacy and as such will use reasonable measures to ensure that CCTV cameras are not positioned to capture photographs or images in areas where the expectation of privacy is greater eg toilets or changing rooms.

We are able to process your information in this way because we have a legitimate interest to ensure site security and a legal obligation to provide a safe working environment to our operatives.