# GDPR Data Privacy Notice

**Last Updated:** 1st April 2025

At Waste Paper Solutions ("we", "us", or "our"), we are committed to safeguarding the privacy and security of your personal information. This notice explains how we collect, use, share, and protect the personal data we obtain in the course of our business operations. Please read this notice carefully to understand our practices regarding your personal data.

This notice is provided in accordance with the General Data Protection Regulation (GDPR).

**1. Understanding Key Terms**

To help you understand this notice, here are some important definitions:

- **Data Controller:** The entity that determines the purposes and means of processing personal data. For the purposes of your data, Waste Paper Solutions is the data controller.
- **Data Processor:** An entity that processes personal data on behalf of the data controller.
- **Data Subject:** The individual whose data is being processed (i.e., you).
- **Personal Data:** Any information relating to an identified or identifiable natural person. This can include their name, contact details, collection address, and vehicle information (if provided for access).
- **Processing:** Any operation performed on personal data, such as collection, recording, storage, use, disclosure, or deletion.
- **Third Party:** Anyone other than you, Waste Paper Solutions, our processors, and individuals authorised to process data under our direct authority.

**2. Who We Are**

Waste Paper Solutions is a company specialising in the secure collection, processing, and shredding of confidential documents and WEEEE waste.

Our contact details are:

Waste Paper Solutions

Sunnybank House, High Street, Mayfield, TN20 6AA.

01435 408118

For any data privacy enquiries, please contact our Data Protection Team at compliance@wastepapersolutions.co.uk

**3. How We Use Your Data**

We collect and process your data for the following specific purposes related to our confidential waste management services:

- **Service Provision:** To arrange and carry out the collection, transportation, and processing of your confidential waste according to our contractual agreement.
- **Account Management:** To set up and manage your account, including billing, invoicing, and payment processing.
- **Communication:** To communicate with you regarding your service, schedule changes, service updates, and respond to your enquiries.
- **Quotation and Contractual Matters:** To provide you with quotations for our services and to fulfil our obligations under any contracts we have with you.
- **Operational Efficiency:** To optimise our collection routes, manage our fleet, and improve the efficiency of our services.
- **Compliance and Legal Obligations:** To comply with legal and regulatory requirements, including record-keeping and environmental regulations.
- **Security and Safety:** To ensure the security of our operations and the safety of our personnel, which may involve the use of vehicle or site access information.
- **Improving Our Services:** To analyse data to understand service usage patterns and identify areas for improvement in our processes and customer experience.

**4. The Types of Data We Collect**

We may collect and process the following categories of data about you:

- **Identification and Contact Information:** Your name, address, email address, phone number, and company name (if applicable).
- **Service-Related Information:** Details about the type and volume of waste paper for collection, collection frequency, and specific collection instructions.

- **Financial Information:** Billing address, payment details (although we typically use secure third-party processors and do not directly store sensitive payment information).
- **Vehicle Information:** Vehicle registration details if you are providing access to our collection vehicles on your premises.
- **Communication Data:** Records of our correspondence with you, including emails and phone call notes.
- **Website Usage Data:** If you use our website, we may collect information about your browsing activity, IP address, and device information (please see our separate Cookie Policy for more details).

**We do not collect any special categories of personal data** (such as information about your race, ethnicity, health, religious beliefs, sexual orientation, etc.) in the course of providing our confidential waste management services.

**5. Our Legal Basis for Processing Your Data**

We will only process your personal data when we have a lawful basis to do so. These bases include:

- **Performance of a Contract:** Processing is necessary to fulfil our contractual obligations to you, such as providing confidential waste collection services.
- **Legal Obligation:** Processing is necessary to comply with legal or regulatory requirements.
- **Legitimate Interests:** Processing is necessary for our legitimate business interests, such as managing our operations, improving our services, and communicating effectively with you, provided that your interests and fundamental rights do not override those interests.
- **Consent:** In specific circumstances, we may ask for your explicit consent to process your personal data. If we rely on consent, we will provide you with clear information about the processing and you have the right to withdraw your consent at any time.

The specific legal basis for each processing purpose is outlined below:

| Purpose | Data Type(s) | Legal Basis for Processing |
|---|---|---|
| Service Provision | Identification and Contact Information, Service-Related Information | Performance of a contract with you |

| | | |
|---|---|---|
| Account Management | Identification and Contact Information, Financial Information | Performance of a contract with you |
| Communication | Identification and Contact Information, Communication Data | Performance of a contract with you, Legitimate Interests (responding to enquiries, providing service updates) |
| Quotation and Contractual Matters | Identification and Contact Information, Service-Related Information | Taking steps at your request prior to entering into a contract, Performance of a contract with you |
| Operational Efficiency | Service-Related Information, Vehicle Information | Legitimate Interests (optimising routes, managing fleet) |
| Compliance and Legal Obligations | All relevant data categories | Legal Obligation |
| Security and Safety | Vehicle Information | Legitimate Interests (protecting our operations and personnel) |
| Improving Our Services | Service-Related Information, Website Usage Data | Legitimate Interests (analysing service usage, improving our offerings) |

Export to Sheets

**6. Sharing Your Personal Data**

We may share your personal data with the following categories of recipients for the purposes described in this notice:

- **Our Employees and Contractors:** Individuals within Waste Paper Solutions who need access to your information to perform their jobs.
- **Service Providers:** Third-party companies that provide services on our behalf, such as IT support, website hosting, payment processing (where applicable), and logistics or transportation services. We ensure these providers have appropriate data protection measures in place.
- **Regulatory Authorities:** When required by law, we may disclose your personal data to government agencies, environmental regulators, or other competent authorities.
- **Professional Advisors:** Such as lawyers, accountants, and auditors, where necessary to obtain professional advice or to comply with legal obligations.

- **In the event of a business transfer:** If we sell, transfer, or merge part of our business, your personal data may be transferred to the new owners, but only if they agree to process your data in accordance with this notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your data for specified purposes and in accordance with our instructions.

**7. How Long We Keep Your Personal Data**

We will retain your personal data only for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the volume, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process your personal data, and applicable legal requirements.

Typically, we will retain customer data for the duration of our contractual relationship and for a reasonable period thereafter to address any queries or claims, and to maintain necessary business records. Specific retention periods for different types of data are outlined in our internal Data Retention Policy, which is available upon request.

**8. Your Rights Regarding Your Data**

Under the GDPR, you have several rights regarding your personal data:

- **The Right to Access:** You have the right to request a copy of the personal data we hold about you.
- **The Right to Rectification:** You have the right to request that we correct any inaccurate or incomplete personal data we hold about you.
- **The Right to Erasure ("Right to be Forgotten"):** You have the right to request that we delete your personal data when it is no longer necessary for the purposes for which it was collected, or if there is no other legal basis for its processing.
- **The Right to Restriction of Processing:** You have the right to request that we restrict the processing of your personal data in certain circumstances, such as when you contest the accuracy of the data.
- **The Right to Object:** You have the right to object to the processing of your personal data where we are relying on our legitimate interests (or those of a third party) and

there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object to direct marketing.

- **Rights in relation to automated decision making and profiling:** We do not currently engage in automated decision-making or profiling that significantly affects you.

To exercise any of these rights, please contact our Data Protection Team using the contact details provided in Section 2. We may need to verify your identity before fulfilling your request.

**9. International Data Transfers**

We primarily process your personal data within the United Kingdom. In the event that we need to transfer your data outside the UK or the European Economic Area (EEA), we will ensure that appropriate safeguards are in place to protect your personal data in accordance with the GDPR.

**10. Automated Decision Making**

We do not use automated decision-making processes, including profiling, that could significantly affect you. All decisions regarding our services and your account are made by human personnel.

**11. Updates to This Privacy Notice**

We may update this Data Privacy Notice from time to time to reflect changes in our practices or legal requirements. We will post any changes on our website and, where appropriate, notify you by other means. Please check this page regularly to stay informed about our privacy practices.

**12. Contacting Us and Making a Complaint**

If you have any questions, concerns, or requests regarding this Data Privacy Notice or our data processing practices, please contact our Data Protection Team at:

compliance@wastepapersolutions.co.uk

If you are not satisfied with our response or believe that we have not processed your personal data in accordance with the law, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection. You can contact the ICO at:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113 Website: https://ico.org.uk/

Thank you for entrusting Waste Paper Solutions with your waste management needs. We are committed to protecting your privacy.