

Privacy Policy

(PPP008)



Privacy Policy

1 Introduction

This policy explains how we collect and use your personal data and which rights and options you have in this respect. Please also refer to our Cookie Policy which explains the use of cookies and other web tracking devices via our websites.

2 Who is responsible for your personal data?

Papilo is responsible for your personal data. “Papilo” or “the Papilo group of companies” comprises Papilo and any respective subsidiary companies from time to time.

The expression “Papilo Entity” means any one of these companies. In circumstances where a Papilo Entity is providing services to you your data will be controlled by the Papilo Entity that is providing those services.

3 Which personal data do we collect?

The personal data we collect may include:

- Contact information, such as your name, job title, postal address, including your home address, where you have provided this to us, business address, telephone number, mobile phone number, fax number and email address.
- Payment data, such as data necessary for processing payments and fraud prevention, including credit/debit card numbers, security code numbers, bank account numbers and sort codes and other related billing information.
- Further business information necessarily processed in a contractual relationship with Papilo or voluntarily provided by you, such as instructions given, payments made, requests.
- Your password for the Papilo Client Portal, or other password protected platforms or services, where you have been granted access to one by a Papilo Entity.
- Information collected from publicly available resources, databases and credit reference agencies.
- If legally required for compliance purposes, information about relevant and significant litigation or other legal proceedings against you or a third party related to you and interaction with you which may be relevant for antitrust purposes.
- Special categories of personal data. In connection with the registration for and provision of access to an event or seminar, we may ask for information about your health for the purpose of identifying and being considerate of any disabilities or special dietary requirements you may have. Any use of such information is based on your consent. If you do not provide any such information about disabilities or special dietary requirements, we will not be able to take any respective precautions.
- Other personal data regarding your preferences where it is relevant to services that we provide.
- Details of our visits to your premises when a Papilo Entity provides you with services which may include images, audio and video captured by handheld devices or by vehicle-based cameras.

- Other personal data captured by vehicle-based cameras or handheld devices, body worn cameras or aerial drones which may include still images, audio and video.⁴ Who this policy applies to

4 How do we collect your personal data?

We may collect personal data about you in several circumstances, including:

- When you or your business engages us to provide services.
- When you or your business browse, make an enquiry or otherwise interact with us on our website or by telephone.
- When you attend a Papilo event, waste facility or office.
- When we attend your premises to provide services.
- When we or the vehicles or plant we operate are near you.
- When you or your business offer to provide or provide services to us.
- In some circumstances, we collect personal data about you from a third-party source. For example, we may collect personal data from your business, other organisations with whom you have dealings, government agencies, a credit reporting agency, an information, or service provider or from a publicly available record.

5 Are you required to provide personal data?

As a general principle, you will provide us with your personal data entirely voluntarily; there are generally no detrimental effects for you if you choose not to consent or to provide personal data.

However, there are circumstances in which Papilo cannot act without certain of your personal data, for example because this personal data is required to provide you with services, process your requests or deal with queries or complaints connected with our services or provide you with access to web portals or newsletters. In these cases, it will unfortunately not be possible for us to provide you with what you request without the relevant personal data, and we will notify you accordingly.

6 For which purposes will we use your personal data?

We may use your personal data for the following purposes ("Permitted Purposes"):

- Providing services you may have requested, including on-line services as requested by you or your business.
- Managing and administering your or your business's relationship with Papilo, including processing payments, accounting, auditing, billing and collection, support services.
- Compliance with our legal obligations (such as record keeping obligations), compliance screening or recording obligations (e.g. for anti-money laundering, financial and credit check and fraud and crime prevention and detection purposes), which may include automated checks of your contact data or other information you provide about your identity and contacting you to confirm your identity.
- To analyse and improve our services and communications to you.
- Protecting the security of and managing access to our waste facilities, premises, plant, vehicles, and equipment, IT and communication systems, online platforms, websites, and other systems, preventing and detecting security threats, fraud or other criminal or malicious activities.
- For insurance purposes including dealing with claims made against or by Papilo which Papilo may pass to its insurers, insurance claims handlers, loss adjusters or legal advisers.
- For monitoring and assessing compliance with our policies and standards.

- To identify persons authorised to trade on behalf of our customers or suppliers.
- To comply with our legal and regulatory obligations including reporting to and/or being audited by regulatory bodies.
- To comply with court orders and exercise and/or defend our legal rights.
- To investigate and respond to complaints.
- For any purpose related and/or ancillary to any of the above or any other purpose for which your personal data was provided to us.

Where you have expressly given us your consent, we may process your personal data also for the following purposes:

- Communicating with you through the channels you have approved to keep you up to date on industry developments, announcements, and other information about Papilo and the services Papilo provides, (including newsletters and other information) as well as any Papilo events and projects; or
- Customer surveys, marketing campaigns, market analysis, sweepstakes, contests or other promotional activities or events; or
- Collecting information about your preferences to create a user profile to personalise and foster the quality of our communication and interaction with you (for example, by way of newsletter tracking or website analytics).

Regarding marketing-related communication, we will - where legally required - only provide you with such information after you have opted in and provide you the opportunity to opt out anytime if you do not want to receive further marketing-related communication from us. We will not use your personal data for taking any automated decisions affecting you or creating profiles other than described above.

7 What is the legal basis that permits us to use your personal data?

Depending on which of the above Permitted Purposes we use your personal data for, we may process your personal data on one or more of the following legal grounds:

- Because processing is necessary for the performance of a contract with you or your business.
- To comply with our legal obligations (e.g. to keep records for tax purposes).
- Because processing is necessary for purposes of our legitimate interest or those of any third-party recipients that receive your personal data, provided that such interests are not overridden by your interests or fundamental rights and freedoms.

In addition, the processing may be based on your consent where you have expressly given that to us.

8 With whom will we share your personal data?

We may share your personal data in the following circumstances:

- We may share your personal data between the Papilo Entities on a confidential basis where required for the purpose of providing services and for administrative, billing, and other business purposes.

- If we have collected your personal data in the course of providing services to your business, we may disclose it to that business or others in that business and, where permitted by law to others for the purpose of providing those services.
- We may disclose your contact details on a confidential basis to third parties for the purposes of collecting your feedback on the Papilo's services, to help us measure our performance and to improve and promote our services.
- We may share your personal data with companies providing services for money laundering checks, credit risk reduction and other fraud and crime prevention and detection purposes and companies providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such personal data is shared. Credit reference agencies used by us may share your personal data with other organisations for the purposes of credit risk assessment.
- We may share your personal data with any third party to whom we assign or novate any of our rights or obligations.
- We may share your personal data with courts, law enforcement authorities, regulators or legal advisers or other parties where it is reasonably necessary for the establishment, exercise, or defence of a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution process.
- We may also instruct service providers within or outside of Papilo, domestically or abroad, e.g. shared service or data centres, to process personal data for the Permitted Purposes on our behalf and in accordance with our instructions only. Papilo will retain control over and will remain fully responsible for your personal data and will use appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data when engaging such service providers.
- We may also use aggregated personal data and statistics for the purpose of monitoring website usage to help us develop our website and our services.

Otherwise, we will only disclose your personal data when you direct us or give us permission, when we are required by applicable law or regulations or judicial or official request to do so, or as required to investigate actual or suspected fraudulent or criminal activities.

9 Personal data about other people which you provide us.

If you provide personal data to us about someone else (such as one of your directors or employees, or someone with whom you have business dealings) you must ensure that you are entitled to disclose that personal data to us and that, without our taking any further steps, we may collect, use and disclose that personal data as described in this Privacy Statement.

In particular, you must ensure the individual concerned is aware of the various matters detailed in this Privacy Statement, as those matters relate to that individual, including our identity, how to contact us, our purposes of collection, our personal data disclosure practices (including disclosure to overseas recipients), the individual's right to obtain access to the personal data and make complaints about the handling of the personal data, and the consequences if the personal data is not provided (such as our inability to provide services).

10 Keeping personal data about you secure.

We will take appropriate technical and organisational measures to keep your personal data confidential and secure in accordance with our internal procedures covering the storage, disclosure of and access to personal data. Personal data may be kept on our personal data technology systems, those of our contractors or in paper files.

11 Transferring your personal data abroad.

Papilo provides services to its customers both within the United Kingdom and the EU. However, we may transfer your personal data outside this jurisdiction if required for the Permitted Purposes as described above. This may include countries which do not provide the same level of protection as the laws within the European Economic Area. We will ensure that any such international transfers are made subject to appropriate or suitable safeguards as required by the General Data Protection Regulation (EU) 2016/679. This includes entering into the EU Standard Contractual Clauses which are available here. You may contact us anytime using the contact details below if you would like further information on such safeguards.

When doing so we will comply with applicable data protection requirements and take appropriate safeguards to ensure the security and integrity of your personal data.

12 Updating personal data about you.

If any of the personal data that you have provided to us changes, for example if you change your email address or if you wish to cancel any request you have made of us, or if you become aware we have any inaccurate personal data about you, please let us know by sending an email to helpdesk@wearepapilo.com

We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient, or incomplete Personal Data that you provide to us.

13 For how long do we keep your personal data?

Your personal data will be deleted when it is no longer reasonably required for the Permitted Purposes, or you withdraw your consent (where applicable) and we are not legally required or otherwise permitted to continue storing such data. We will retain your personal data where required for Papilo to assert or defend against legal claims until the end of the relevant retention period or until the claims in question have been settled.

14 Your rights

Subject to certain legal conditions, you have the right to request a copy of the personal data about you which we hold, to have any inaccurate personal data corrected and to object to or restrict our using your personal data. You may also make a complaint if you have a concern about our handling of your personal data.

If you wish to do any of the above, please send an email to helpdesk@wearepapilo.com. We may request that you prove your identity by providing us with a copy of a valid means of identification for us to comply with our security obligations and to prevent unauthorised disclosure of data. We reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your data, and for any additional copies of the personal data you request from us.

15 Review of this statement

This Privacy Statement was last updated 6 February 2024. We reserve the right to update and change this Privacy Statement from time to time to reflect any changes to the way in which we process your personal data or changing legal requirements. In case of any such changes, we will post the changed Privacy Statement on our website or publish it otherwise. The changes will take effect as soon as they are posted on this website.

16 How to get in touch with Papilo

If you would like to contact us with any queries or comments regarding this Privacy Statement, please send an email to helpdesk@wearepapilo.com or send a letter to the bellow address:

PPP008 V1

Suite 33
3rd Floor Lowry Mill
Lees Street
Swinton
Pendlebury
Manchester
M27 6DB

17 Director sign-off

Name Paul Hodgkiss
Position CEO
Signature *Paul Hodgkiss*
Date 06/02/2024

Document Control

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