#### Last update: May 2018

#### Update to the WEEE Black Box PRIVACY POLICY

The reason for this WEEE Black Box Privacy Policy (further referred to as 'Privacy Policy') is to demonstrate our firm commitment to help our Producer users/members better understand what information we collect about them and what may happen to that information.

We make it even easier to understand the data we have about you, how you can correct it and how you can ask us to stop using it.

Your privacy comes first. We now meet the high standard for data privacy introduced by the new European data protection law known as the General Data Protection Regulation (GDPR), which goes into effect on the 25th of May, 2018.

We are committed to ensuring that your privacy is protected. We protect your personal data. Should we ask you to provide certain information by which you can be identified when using the WEEE Black Box, then you can be assured that it will only be used in accordance with this Privacy Policy.

For more detailed information about the Privacy Policy, please see our Privacy Policy below.

# PRIVACY POLICY WEEE Black Box

## What this Privacy Policy covers?

The following explains our Privacy Policy regarding the personal information we collect about you:

• By agreement for offering WEEE compliance services.

It explains how we use the information we collect

• To provide you with the information you require and improve the service we can offer you.

We are committed to protecting and respecting any personal data shared with us.

## **Privacy Policy changes**

By registering to do business with the WEEE Black Box you agree to accept this Privacy Policy and are aware that our Privacy Policy may change with time. Any changes to this Privacy Policy will appear on the Privacy Policy page.

#### Your data

#### Information we collect

• In accordance with the Legitimate Interests basis for processing as defined in the GDPR, we collect your contact name, address, telephone numbers, inbound voice calls and email addresses.

## Why we collect this information

- To provide the WEEE compliance services you have requested and that we deliver.
- To provide you with information in relation to those services.
- To comply with our legal obligations under WEEE and other waste legislation.

## Who we might share this information with

Our Legal Obligation to Disclose Personal Information

We keep your information strictly confidential. We will only reveal a Producer user's personal information without his/her prior permission if we have reason to believe that the disclosure of this information is required by law to establish the identity of a person who may be infringing the law, to contact or to initiate legal proceedings. We are permitted to disclose personal information when we have good reason to believe that this is legally required.

In addition,

- If you are a Member, we share this information with relevant Government Agencies.
- Our legal advisors where this may be required.
- Authorized Personnel.

We will not sell, distribute or lease your personal information to third parties unless we are required by law to do so.

## What we do with your information

We may store it securely:

- The WEEE Black Box reporting tool for Producer participants.
- Our Email system.
- Our Accounting System.
- Our CRM System.

## How long we keep your information for

The WEEE Black Box will not retain data longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations.

- Producer users we hold your information for the period of your Membership or as long as required by law.
- We also keep the information for the current Government Agency Reporting year, and for a period required by law thereafter for clarification of any potential dispute and compliance with applicable legislation.

## Security

Any information stored on the WEEE Black Box is treated as confidential. All information is stored securely and is accessed by authorized personnel only. Our service provider implements and maintains appropriate technical, security and organizational measures to protect Personal Data against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure.

## **Geographical location**

The data stored in the WEEE Black Box is stored on servers located in the Netherlands. Personal Data is not transmitted between Data Regions. For Producer users with accounts located in European Data Region, all Personal Data is processed in the EEA.

## **Use of Cookies**

What type of cookies may we use?

#### Session cookies

Session cookies are temporary. They allow the operators of the WEEE Black Box to link the actions of a Producer user during a browser session. A browser session starts when a Producer user opens a browser window and finishes when they close it. Once you close the browser, all session cookies are deleted.

Examples of how we use session cookies:

- To improve the usability of our site.
- To route the visitor to the most available web server.

Cookies categorized according to function:

#### Strictly necessary cookies

Strictly necessary cookies are essential to navigate around the WEEE Black Box and to use its features. Without them, Producer users would not be able to use basic services like registration. These cookies do not gather information about Producer users that could be used for marketing or remembering where a Producer user has been on the internet.

Examples of how the WEEE Black Box uses 'strictly necessary' cookies include:

Allowing visitors to sign in to the website as a registered user.

## Acceptance of these Conditions

We assume that all Producer users of the WEEE Black Box have carefully read this document and agree to its contents. If someone does not agree with this Privacy Policy, they should refrain from using our website and platform. We reserve the right to change our Privacy Policy as necessity dictates. Continued use of WEEE Black Box after having been informed of any such changes to these conditions implies acceptance of the revised Privacy Policy.

## How you can access the information we hold

By submitting a Subject Access Request letter or email to the Data Protection Officer (if appointed) or the appointed person within the WEEE Compliance Scheme.