

THORNTONS RECYCLING PRIVACY POLICY

Introduction

This policy outlines how we handle and use your personal information and informs you of your rights in relation to that information. Under the General Data Protection Regulation (GDPR) of May 2018 & The Data Protection Act 2018, *Thorntons Recycling* is the controller of the personal data we collect.

Thorntons Recycling ("we," "our," or "us") is committed to protecting and respecting your privacy. This Privacy Policy explains why and how we use the personal information we obtain from you or others, who we share it with, and the rights you have in connection with how we use your information. Please read this policy carefully to understand our practices.

If you have any questions about how your data is processed, please reach out to our Data Protection Team at <u>GDPR@thorntons-recycling.ie</u>.

Personal Information We Collect About You

We at Thorntons Recycling collect information that you provide us with directly and information we gather from your visits to our website through cookies (please visit out <u>cookie</u> <u>policy</u> for more information on this).

In reference to information we collect directly from you, this includes:

- Name
- Address
- E-Mail Address
- Telephone Number
- Transaction records you have undertaken with us
- Your marketing preferences
- Payment & card details

How We Use Your Personal Information

We use your personal data for various purposes during your customer relationship with us. These include:



Purpose	Categories of Data Subject	Personal Data Types	Legal Basis
To register you for Thorntons services at your own request	Customer	Name Email address Phone number Payment details	Performance of a Contract
To provide a product or service purchased by you	Customer	Name Address Email Address	Performance of a Contract
Processing payments and transaction	Customer	Name Email Financial Information	Performance of a Contract
Contact you regarding Thorntons' products and services which we believe could be on interest to you	Customer	Name Email Address Phone Number	Consent
Contact you regarding service-related updates & reminders	Customer	Name Email Phone Number	Legitimate interest
New customer welcome pack	Name, email, account number	Name Email	Legitimate interest

Where You Have Provided Consent

We will only ever contact you with marketing information if you have provided your consent (opted in). At any stage you can amend your marketing preferences with us by reaching out to <u>GDPR@thorntons-recycling.ie</u>.

You can also choose to receive communications from us via SMS text message and/or email.



Third Party Disclosure of Your Personal Data

We only share your personal information outside of our organisation in specific circumstances. When we do so, we will establish a contract that obliges recipients to protect your personal information, unless we are legally compelled to disclose such information. Any contractors or recipients engaged by us will be required to adhere to our instructions. We do not sell your personal information to third parties.

We may disclose your information to our third-party service providers (referred to as "Suppliers") for the purpose of delivering services to us or directly to you on our behalf. This includes for administration, financial, accounts, communication and App hosting purposes.

Transfers of Your Personal Data outside of Europe

We do not currently transfer your personal information outside of Europe. Should this change in the future, we will inform you and implement measures to safeguard your personal information.

Retention Periods

We have implemented a Retention Schedule that ensures your personal data is not retained for longer than necessary to fulfil its original purpose. For more information on our compliance with Storage Limitation please reach out to <u>GDPR@thorntons-recycling.ie</u>.

Your Rights as a Data Subject

Under the General Data Protection Regulation, you have specific rights as a Data Subject. We at Thorntons Recycling have developed a process to ensure you can exercise these rights at any stage. These Rights include;

- The Right of Access
- The Right to Rectification
- The Right to Erasure
- The Right to Restriction of Processing
- The Right to Object to Processing
- The Right to Data Portability
- The Right to Complain to the Supervisory Authority

To submit a request for Access, Rectification, Erasure, Restriction, Objection or Portability please submit a form through the following link.

Or email our Data Protection Team at GDPR@thorntons-recycling.ie.

To lodge a complaint with the Data Protection Commission Ireland please visit their website at <u>www.dataprotection.ie</u> for more information.

Unsubscribing / Opting Out



From time to time, we may contact you with details about special promotional offers or products that we believe may interest you via email and/or SMS. If you do not wish to receive these communications, you can opt out in the following ways:

Please contact GDPR@thorntons-recycling.ie

Changes to Our Privacy Policy

Please check this page regularly for any changes to this policy.

You can contact us with any queries related to this policy or for any other reason by email, or phone.

Please email us at GDPR@thorntons-recycling.ie or call us on (01) 623 5133.