

## Privacy Policy

Re-turn is committed to protect your personal data and this privacy policy provides information about the ways in which we collect, store, and use your personal data and what are your rights in relation to that data, in accordance with the General Data Protection Regulation (GDPR) and the Irish Data Protection Act 2018 (DPA).

In this statement, the terms “Re-turn”, “we”, “our” and “us” refer to DRSI CLG, trading as Re-turn.

*When you use Re-turn's services, you agree to our privacy policy and our processing of your personal information. Our privacy policy should be read and understood before you use our services.*

### 1. What is personal data?

Personal data is any information relating to an identified or identifiable person that allows, directly or indirectly, the identification of that person. This could include a name, address, contact details, identification numbers, IP address, audio-visual or audio recordings or location data.

### 2. What data do we collect?

Re-turn is the data controller responsible for the collection, storage, and usage of your personal data. A controller is someone who, alone or jointly with others, determines the purposes and means of the processing of personal data.

We may collect information about you directly or indirectly in a variety of ways, including if you register on our website, contact us, or use another Re-turn service. Therefore, we may collect the following data:

- Name, e-mail address, phone number, company registration number, postal address, image, sounds, cookies, etc.
- Device information such as IP addresses, language settings, browser settings, time zone, operating system, platform and screen resolution, geographic location, etc.

Re-turn do not collect special categories of personal data, such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, data concerning health or one's sex life or sexual orientation.

### 3. How do we collect your data?

You directly provide Re-turn with most of the data we collect, when you:

- Contact and/or communicate with us by mail, phone, email, social medias or otherwise;
- Apply for membership with Re-turn;
- Create an account on the Re-turn website;
- Subscribe to our service, publications or newsletter, or sign up to a mail list;
- Enter a competition, promotion or survey or provide us with feedback;
- Reply to a request for the provision of goods or services or solicitation of same;
- Apply to work with us; or
- Use or view our website, when we automatically collect information about your equipment, browsing activities, and patterns. These personal data are collected using cookies and other technologies. Please see our cookie policy (<https://re-turn.ie/cookie-policy.pdf>) for further details.

Re-turn's website may contain links to third-party websites, plug-ins, or applications. By clicking on or enabling those links, third parties may collect and share your personal information. We are not responsible for how third-party websites use your personal information or their privacy statements. It is important that you read the privacy policies of every website you visit when you leave the Re-turn website.

Re-turn may also receive your data indirectly from the following sources:

- Social media channels;
- Companies Registration Office.

Whenever we are required to collect your personal data by law or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you and our services may be cancelled, but we will notify you in this case.

#### 4. Why we will collect and how we will use your data?

Please see below the purpose and legal basis for collecting and processing the data you provide to us:

Purpose	Legal Basis
To register new member and administer memberships.	Performance of a contract with you or your employer.
To process and administer membership applications, including: <ul style="list-style-type: none"> <li>• Managing payments, fees and charges;</li> <li>• Collecting and recovering money owed to us;</li> </ul>	Performance of a contract with you or your employer. Necessary for our legitimate interest (to recover debts due to us).
To manage the relationship with members, website users or the general public.	Performance of a contract with you or your employer. Necessary for our legitimate interest (to keep our records updated; to assess how users engage with our services).
To enable you or your employer to take part in a campaign, prize draw, competition, complete a survey or give us feedback.	Necessary for our legitimate interest (to assess how users engage with our services; to raise awareness and generate interest in our recycling activities, campaigns and initiatives).
To administer, secure, and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Necessary for our legitimate interest (for the running of our business, provision of administration and IT services and network security; to prevent fraud). Necessary to comply with a legal obligation.
To deliver relevant website content, measure or understand the effectiveness of the content and allow you to participate in interactive features of the website when you choose to do so.	Necessary for our legitimate interest (to assess how users engage with our services; to develop our services; to grow our business and to inform our marketing strategy). Your consent is needed for the use of website cookies.

To use data analytics to improve the website, services, marketing, member relationships and experiences.	Necessary for our legitimate interest (to keep our website updated and relevant; to develop our business; to inform our marketing strategy). Your consent is needed for the use of website cookies.
To respond any queries or other communications you submit to us.	Necessary for our legitimate interest (engage with users and the general public; to improve the relationship with members).
To send you publications, newsletters or administer our mailing list.	Your consent.
To create a candidate profile for you if you are a prospective employee.	Necessary for our legitimate interest (to improve talent management and acquisition).

Your personal data may be shared with third party product and service providers and sub-contractors that perform services and functions at our direction and on our behalf. This may be necessary for us to fulfil our contract with you or your employer. Third party product and service providers may include auditors, accountants, legal and tax advisers, communication services, financial and banking services, insurers, professional advisors, IT service providers, security service providers, and administrative services providers.

Additionally, your personal data may also be shared with analytics and search engine providers to assist us in the improvement and optimisation of our website.

Finally, your personal data may be shared with An Garda Síochána, government or quasi-government bodies, courts and tribunals, if we are required to do so by law.

#### 5. For how long the data is stored?

According to this privacy policy, we only store your personal data for as long as necessary to fulfil the purposes for which it was collected. Re-turn may save the information longer if necessary to comply with legal, regulatory, tax, accounting or reporting requirements or to safeguard Re-turn's legal interests (in the event of a complaint or if there is a prospect of litigation).

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

#### 6. Where do we process the data?

Although we always aim to process your data within the EU/EEA, some situations may require providers or subcontractors to transfer such data to countries outside the EU/EEA. As we are committed to protecting your data, Re-turn will take all reasonable legal, ethical and technical measures to safeguard your data with the same level of protection offered within the EU/EEA.

#### 7. How do we secure your data?

Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure any data we hold about you.

#### 8. Your rights

We would like to make sure that you are fully aware of your data protection rights. Every data subject is entitled to the following:

- The right to access: If you wish to have a copy of the information we collected from you, you just need to request it. This copy request is free of charge and can be made using the contact details in section 10.
- The right to rectification: You can have your information rectified if you believe it is incorrect or incomplete.
- The right to erasure: You can have your information deleted from our data base, in case the data is no longer necessary for the purpose for which it was collected.
- The right to restrict processing: You can request us to restrict the processing of your information.
- The right to object processing: You can object to the processing of your information where the processing is based on our legitimate interest or your consent.
- The right to data portability: You can request to have the information we collected transferred to another organisation or to you.

These rights can be limited under the data protection laws. If you would like to exercise any of these rights, please contact us with the contact details provided in section 10. Our goal is to respond to your request within one month, but in the event we are unable to process your request within one month, we may extend it by two months. If we are unable to help, you also have the right to lodge a complaint with the Data Protection Commission ([www.dataprotection.ie](http://www.dataprotection.ie)).

#### 9. Cookies

A cookie is a small text file stored on your web browser or computer to collect standard internet log information and visitor behaviour information. We may collect information about you when you visit our website using cookies or other similar technologies.

For further information, please check our cookie policy at: <https://re-turn.ie/cookie-policy.pdf>

#### 10. Contact us

Our privacy policy is being implemented under the supervision of a Data Protection Officer (DPO). You can contact our DPO using the details provided below if you have any questions or complaints about this privacy policy and data protection.

Phone: + 353 1 467 0190

E-mail address: [data@re-turn.ie](mailto:data@re-turn.ie)

Postal Address: Red Cow Interchange Estate, 1 Ballymount Road, Clondalkin, D22 HW67

#### 11. Changes to our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on this site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our site following the alterations. We recommend that you check this page regularly to keep you up-to-date.

*This privacy policy was last updated on 23/11/2022.*