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Privacy Policy

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1. Key Definitions

- 1.1. **“Personal Data”** means any information relating to an identified or identifiable natural person.
- 1.2. **“Data Subject”** means an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 1.3. **“Re-turn”** or **“the Company”** means the Deposit Return Scheme Ireland CLG.
- 1.4. **“GDPR”** means the European Union General Data Protection Regulation 2019.
- 1.5. **“DPA”** means the Irish Data Protection Act 2018

2. Introduction


- 2.1. At Re-turn, we value your privacy and are committed to protecting your personal data. This Privacy Policy serves as a comprehensive guide to how we collect, store, use, and safeguard your personal information. It also outlines your rights concerning your data, all in accordance with the provisions of the **General Data Protection Regulation (GDPR)** and the **Irish Data Protection Act 2018 (DPA)**.
- 2.2. By engaging with Re-turn's membership and services, you are deemed to acknowledge and accept our Privacy Policy, as well as our procedures for processing your personal information. It is essential that you review and understand the contents of this policy before using our services or applying for membership.

3. What is personal data?

- 3.1. Personal data refers to any information pertaining to an identified or identifiable individual, enabling, either directly or indirectly, the identification of said individual.
- 3.2. This may include a person's name, address, contact details, identification numbers, IP address, audio-visual or audio recordings, or location data.

4. What data do we collect?

- 4.1. Re-turn is the data controller responsible for the overseeing the collection, storage, and usage of your personal data. A data controller is someone who, alone or jointly with others, determines the purposes and means of the processing of personal data.
- 4.2. We gather information about you via various direct and indirect avenues, including registering on our website, reaching out to us, applying for membership, or using other Re-turn services.
- 4.3. Consequently, the following types of data might be collected:

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- Names, e-mail addresses, phone numbers, postal addresses, image, sounds, cookies, etc.
 - Device information such as IP addresses, language settings, browser settings, time zones, operating systems, platform and screen resolutions, geographic locations, etc.
- 4.4. It's essential to note that Re-turn refrains from collecting specific categories of personal data, such as information disclosing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health information, or matters concerning one's sex life or sexual orientation.

5. How do we collect your data?


- 5.1. You provide the majority of the data we gather through various means, including:
- Initiating communication via mail, phone, email, social media, or other channels.
 - Seeking membership with Re-turn.
 - Establishing an account on the Re-turn portal.
 - Subscribing to our services, publications, newsletters, or joining a mailing list.
 - Engaging in competitions, promotions, surveys, and providing feedback.
 - Responding to requests for goods, services, or solicitations.
 - Submitting job applications.
 - Utilising or exploring our website, where we automatically collect information about your equipment, browsing activities, and usage patterns. These personal data are collected through cookies and comparable technologies. Refer to our Cookie Policy at [cookie-policy.pdf \(re-turn.ie\)](https://re-turn.ie/cookie-policy.pdf) for more information on this.
- 5.2. 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.
- 5.3. We may also receive your data indirectly from the following sources:
- Social media platforms.
 - Companies Registration Office.
- 5.4. In instances where we are legally or contractually obligated to collect your personal data, and you fail to provide this data when requested, we may not be able to perform the contract we have or are trying to enter into with you and your membership or our services may be cancelled. We will, however, notify you should this situation arise.

6. Why we collect this data and how it is used?

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

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Purpose	Legal Basis
To register new members and administer memberships.	Necessary to comply with a legal obligations. Performance of a contract with you or your employer.
To process and administer membership applications, including managing payments fees and charges, and collecting/recovering money owed to us.	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 stakeholders).
To send you publications, newsletters or administer our mailing list.	Your consent is required.

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To create a candidate profile for you if you are a prospective employee.	Necessary for our legitimate interest to improve talent management and acquisition.
To collect marketing analytics at events.	Necessary for our legitimate interest (engage with users and the general public; to improve the relationship with stakeholders).
To collect information from non-member participants in the scheme.	Necessary for our legitimate interest (maintaining accurate data for regulatory reporting purposes; improve the relationship with stakeholders)


- 6.2. Your personal data may be shared with third party product and service providers and sub-contractors that perform services and functions following 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.
- 6.3. 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.
- 6.4. 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.

7. How long do we store this data for?

- 7.1. 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.
- 7.2. 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).
- 7.3. 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.

8. Where do we physically process this data?

- 8.1. 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.
- 8.2. 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.

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9. How is this data secured?

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

- **Encryption:** We use industry-standard encryption protocols to protect data transmitted over the internet.
- **Access Controls:** Access to personal data is restricted to authorized personnel only.
- **Secure Storage:** Personal data is stored on secure servers with robust physical and digital security measures.
- **Incident Response:** We have a comprehensive incident response plan in place to promptly address any data breaches or security incidents.

10. Your rights

10.1. We would like to make sure that you are fully aware of your data protection rights.

10.2. 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 13.
- **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 database, in case the data is no longer necessary for the purpose for which it was collected.
- **The right to restrict processing:** You can request that Re-turn restricts the processing of your information.
- **The right to object to 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.

10.3. These rights can be limited under the data protection laws specified in Section 2.1.


10.4. If you would like to exercise any of these rights, please contact us with the contact details provided in Section 13.

10.5. 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.

10.6. If we are unable to help, you also have the right to lodge a complaint with the Data Protection Commission (www.dataprotection.ie).

11. Publication of data

11.1. As part of our commitment to transparency and public interest, we would like to clarify that certain data of our members, such as names and addresses, will be published on

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our website. This practice is mandated by regulatory authorities and falls under the obligation to provide comprehensive and transparent information about our members and for the purpose of identification of Return Points.

- 11.2. We are required to publish these details on our website as an essential aspect of fulfilling our responsibilities in the interest of the public. We understand the sensitivity of personal information and assure you that we take all necessary measures to ensure the security and responsible handling of such data.

12. Cookies

- 12.1. 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.
- 12.2. For further information, please check our cookie policy at: [cookie-policy.pdf \(re-turn.ie\)](#)

13. Data Controller Contact information

- 13.1. For any questions, concerns, or complaints regarding our Privacy Policy and/or data protection, please contact our Data Protection Officer:

- Phone: + 353 1 467 0190
- E-mail: data@re-turn.ie
- Address: Red Cow Interchange Estate, 1 Ballymount Road, Clondalkin, D22 HW67

14. Changes to this Privacy Policy

- 14.1. We may update this Privacy Policy from time to time to reflect changes in regulations or practices. 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.