

PRIVACY POLICY

Safetykleen is committed to protecting your personal data. Personal data is any information that is capable of identifying you as an individual. This Policy explains how we collect and use personal data that we obtain through email, in person or from other third party sources.

We are registered with the Information Commissioner's Office under:

- **Safetykleen Group Services Limited:** Registration number: Z1743259
- **Safety-Kleen U.K Limited:** Registration number: Z6783207

CONTACTING US

If you have any questions about our Privacy Policy or your information, or to exercise any of your rights as described in this privacy policy or under data protection laws, you can contact us:

By Post:

Data Protection Officer
Safetykleen
Profile West, 950 Great West Road
Brentford, Middlesex TW8 9ES
United Kingdom

By Email:

GDPR_UK@Safetykleen.eu

DATA PROTECTION PRINCIPLES

Safetykleen adheres to the following principles when processing your personal data:

1. **Lawfulness, fairness and transparency** – data must be processed lawfully, fairly and in a transparent manner.
2. **Purpose limitation** – data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. **Data minimisation** – data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
4. **Accuracy** – data must be accurate, and, where necessary, kept up to date.
5. **Storage limitation** – data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
6. **Integrity and confidentiality** – data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage by using appropriate technical or organisational measures.

INFORMATION WE COLLECT

Information you give to us

You may provide us with information when you are introduced to us, when we meet you in person, or when we are in contact by phone, email or via our website or otherwise.

The categories of personal data you provide may include:

- first and last name;
- job title and company name;
- e-mail address;
- mailing address;
- telephone number;
- any other identifier that permits Safetykleen to make contact with you.

Information we collect from third parties

We collect most of this information from you directly. However, we also collect information about you:

- from publicly accessible sources, e.g. Companies House;
- which you have made public on the website associated with you or your company or on social media platforms such as LinkedIn;
- from a third party, e.g. a person who has introduced you to us or other professionals you may have worked with or you may engage.

Sensitive personal data

We do not generally seek to collect sensitive (or special categories of) personal data. Sensitive personal data is information relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; health or sex life, sexual orientation; genetic data or biometric data. If we do collect sensitive personal data, we will ask for your explicit consent to our proposed use of that data at the time of collection.

HOW WE USE YOUR INFORMATION

The purpose for which we use and process your information (excluding sensitive personal data) and the legal basis on which we carry out each type of processing is explained below.

- To administer our Website.
- To improve our website to ensure that consent is presented in the most effective manner for you and your computer, mobile device or other item of hardware through which you access the Website; and
- To keep our Website safe and secure.

For all these categories, it is in our legitimate interests to continually monitor and improve our services and your experience as a Safetykleen customer on our website and to ensure network security. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.

Purposes for which we will process the information	Legal Basis for the processing
To provide you with information and services that you request from us.	It is in our legitimate interests to respond to your queries and provide any information requested in order to generate and develop business. To ensure we offer a good and responsive service, we consider this use to be proportionate and will not be prejudicial or detrimental to you.
To enter into and perform contracts with you.	It is necessary for us to process your personal data in this way in order to enter into a contract with you and to fulfil our contractual obligations to you.
To enforce the terms and conditions and any contracts entered into with you.	It is in our legitimate interests to enforce our terms and conditions of service. We consider this use to be necessary for our legitimate interests and proportionate.
To populate our database which we use for marketing purposes.	It is in our legitimate interests to market our services. We endeavour to ensure that the contacts in our database are relevant and up-to-date. We consider this use to be proportionate and will not be prejudicial or detrimental to you.
To send you newsletters, publications, announcements, surveys and marketing communications or notifications we believe may be of interest to you.	You can always opt-out of receiving direct marketing-related email communications by contacting us.
To send you information regarding changes to our policies, other terms and conditions and other administrative information.	It is in our legitimate interests to market our services. We consider this use to be proportionate and will not be prejudicial or detrimental to you.
To measure or understand the effectiveness of any marketing we provide to you and others, and to deliver relevant marketing to you.	You can always opt-out of receiving direct marketing-related email communications by contacting us.
Purposes for which we will process the information	It is in our legitimate interests to ensure that any changes to our policies and other terms are communicated to you. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.



Where we rely on legitimate interests as a lawful basis, we will carry out a check to ensure that your interests, rights and freedoms do not override our legitimate interests.

If you do not wish to provide us with your personal data and processing such information is necessary for the performance of a contract with you, we may not be able to perform our obligations under the contract between us.

Safetykleen will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you in a timely manner and we will explain the legal basis which allows us to do so.

EMAIL MARKETING

For email marketing to an individual subscriber (that is, a non-corporate email address) with whom we have not previously engaged, we need your consent to send you unsolicited email marketing.

Where you provide consent, you can withdraw your consent at any time, but without affecting the lawfulness of processing based on consent before its withdrawal.

You have the right to opt out of receiving email marketing communications from us at any time by contacting us using the contact details set out above. Requests to unsubscribe may take a few days to take effect.

WHO WE SHARE YOUR DATA WITH

We do not share your personal data with third parties except as provided in the Privacy Policy. We share your information only with Safetykleen managers and employees.

Personal data will also be shared with our third party service providers who assist with the running of our website including database service providers, IT services such as backup and disaster recovery service providers and others. Our third party service providers are subject to security and confidentiality obligations and are only permitted to process your personal data for specified purposes and in accordance with our instructions.

In addition, Safetykleen may disclose information about you:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets;
- if all or substantially all of Safetykleen assets are acquired by a third party, in which case personal information held by it about its customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation;
- if necessary to protect the vital interests of a person;
- to enforce or apply our Terms of Use or to establish, exercise or defend the rights of Safetykleen, our staff, customers or others.

INTERNATIONAL TRANSFERS

The personal data we receive may be transferred to, and stored, at a location outside of the European Economic Area (“EEA”) for the purposes of processing by third party service providers that work for Safetykleen. We will normally only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. Where personal data is transferred to and stored in a country not determined by the European Commission as providing adequate levels of protection for personal data, we will ensure protection by:

- using standard contractual clauses approved by the European Commission, obliging recipients to protect your personal data;
- using the EU-U.S. Privacy Shield Framework (where we transfer personal data to the U.S.), which enables U.S. business to self-certify as a means of complying with EU data protection laws.

If you want further information on the specific mechanism used by us when transferring your personal data out of the EEA, please contact us using the details set out above.

SECURITY OF YOUR PERSONAL DATA

Safetykleen use appropriate technical and organisational safeguards to protect personal data both online and offline from unauthorised use, loss or destruction. We use industry standard physical and procedural security measures to protect information from the point of collection to the point of destruction. This includes firewalls, access controls, policies and other procedures to protect information from unauthorised access.

Only authorised personnel and third party service providers are permitted access to personal data, and that access is limited by need. Where data processing is carried out on our behalf by a third party, we take steps to ensure that appropriate security measures are in place to prevent unauthorised disclosure of personal data.

Despite these precautions, however, Safetykleen cannot guarantee the security of information transmitted over the Internet or that unauthorised persons will not obtain access to personal data. In the event of a data breach, Safetykleen have put in place procedures to deal with any suspected breach and will notify you and any applicable regulator of a breach where required to do so.

HOW LONG WE KEEP YOUR PERSONAL DATA

Your personal data will not be kept for longer than is necessary for the purposes for which it was collected and processed and for the purposes of satisfying any legal, accounting or reporting requirements.

The criteria we use for retaining your personal data, includes the following:

- **General queries and correspondence** – when you make an enquiry or contact us by email or telephone, we will retain your information for as long as necessary to respond to your queries. After this period, we will not hold your personal data for longer than 2 years if we have not had any active subsequent contact with you;
- **Direct marketing** – where we hold your personal data on our database for direct marketing purposes, we will retain your data for no longer than 2 years if we have not had any active subsequent contact with you.
- **Legal and regulatory requirements** – we may need to retain personal data for up to 2 years where necessary to comply with our legal obligations, resolve disputes or enforce our terms and conditions.

YOUR RIGHTS

Access to and updating your personal data

You have the right to access information which we hold about you. If you so request, we shall provide you with a copy of your personal data which we are processing (“data subject access request”). We may refuse to comply with a subject access request if the request is manifestly unfounded or excessive or repetitive in nature.

You may also have the right to receive personal data which you have provided to us in a structured and commonly used format so that it can be transferred to another data controller (“**data portability**”). The right to data portability only applies where your personal data is processed by us with your consent or for the performance of a contract and when processing is carried out by automated means.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. Please keep us informed if your personal data changes during your relationship with us.

RIGHT TO OBJECT

Direct marketing

You have the right to object at any time to our processing of your personal information for direct marketing purposes.

Where we process your information based on our legitimate interests

You also have the right to object, on grounds relating to your particular situation, at any time to processing of your personal information which is based on our legitimate interests. Where you object on this ground, we shall no longer process your personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

YOUR OTHER RIGHTS

You also have the following rights under data protection laws to request that we rectify your personal information which is inaccurate or incomplete.

In certain circumstances, you have the right to:

- request the erasure of your personal information (“right to be forgotten”);
- restrict the processing of your personal information to processing in certain circumstances.

Please note that the above rights are not absolute and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply.

EXERCISING YOUR RIGHTS

You can exercise any of your rights as described in this privacy policy and under data protection laws by contacting us as provided in “Contacting us” above.

Save as described in this Privacy Policy or provided under data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we put on your computer if you agree. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and also allows us to improve our site. The cookies we use are "session" cookies. Session cookies are cookies that will be deleted from your computer when you close your browser. These are used to keep track of you whilst you navigate the website and help us improve our website service.

The information generated relating to our website is used to create reports about the use of the website. These reports are strictly statistical data to help us understand more about how our website is being viewed; this includes the popularity of pages, the geographical spread of our customer base and the number of visitors and repeat visitors to our site. Google will store this information. Google's privacy policy is available at:

<http://www.google.com/privacypolicy.html>



HOW WE USE COOKIES

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information for the site improvement purposes highlighted below. This is statistical data about our users' browsing actions and patterns and does not identify any individual

We use the information we obtain from your use of our cookies for the following purposes to:

- Improve the website's usability;
- Analyse the use of our website;

BLOCKING COOKIES

Most browsers allow you to refuse to accept cookies. For example:

- in Internet Explorer you can refuse all cookies by clicking "tools", "internet options", "privacy", and selecting "block all cookies" using the sliding selector;
- in Firefox you can block all cookies by clicking "tools", "options", and un-checking "accept cookies from website" in the "privacy" box.

Blocking all cookies will, however, have a negative impact upon the usability of many websites. Blocking cookies will not have an effect on the usability of the Safetykleen website.

We only use "Google Analytics" on our website. This cookie provides us with a visitor count and an understanding of how visitors move around and use the website. We can then use this information to improve navigability and the website generally. The cookies we use on the website won't collect personally identifiable information about you and we won't disclose information stored in cookies that we place on your device to third parties.

We are obliged by Google Analytics to state the following:

This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.



LINKS

Our website may, from time to time, contain links to and from the website of third parties.

If you follow a link to any of these websites, please note that these websites have their own privacy policies and Safetykleen does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

EMAIL MONITORING

Whilst every member of the Safetykleen team has a personal email address, email which you send to us or which we send to you may be captured in our database and visible to authorised Safetykleen and employees. All emails may also be monitored from time to time by Safetykleen to ensure compliance with our internal compliance policies.

COMPLAINTS

If you have concerns about our use of your personal data, please send an email with the details of your complaint to GDPR_UK@Safetykleen.eu

You also have the right to complain to the Information Commissioner's Office (<https://ico.org.uk/>).

CHANGES TO OUR PRIVACY POLICY

Safetykleen reserves the right to change this privacy policy from time to time. Any changes will be posted on this page with an updated revision date. We will post a prominent notice on the website to notify you of any significant changes to our privacy policy, or update you by other appropriate means.

This privacy policy was last updated on 21 May 2018.