THAMES SECURITY SHREDDING LTD

THAMES GROUP

Privacy Policy

Thames Security Shredding ("We") are committed to protecting and respecting your privacy. We will comply with all applicable requirements of the Data Protection Legislation. This policy is in addition to, and does not relieve, remove or replace, our obligations under the Data Protection Legislation.

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any Personal Data we collect from you, or that you provide to us (whether through our website or otherwise), will be processed by us. It also sets out the scope, nature and purpose of processing. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <u>https://www.thamessecurityshredding.com</u> you are accepting and consenting to the practices described in this policy.

Any reference to Data Protection Legislation in this policy means (i) unless and until the GDPR is no longer directly applicable in the UK, the General Data Protection Regulation ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (ii) any successor legislation to the GDPR or the Data Protection Act 1998.

Data Controller, Data Processor and Personal Data have the meanings as defined in the Data Protection Legislation.

For the purpose of the Data Protection Legislation, the data controller is Thames Security Shredding whose registered office address is at Thames House, Paycocke Road, Basildon, SS14 3AP.

Information we may collect from you

We may collect and process the following data about you:

Information you give us. You may give us information about you by filling in forms on our site <u>https://www.thamessecurityshredding.com</u> (our site) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to any of our services, subscribing to newsletters or other updates, search for a product or service, place an order with us, make an enquiry, participate in social media functions on our site, enter a competition, promotion or survey and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description and employer.

Information we collect about you. With regard to each of your visits to our site we may automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plugin types and versions, operating system and platform;
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

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Information we receive from other sources. We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site. We may receive information about you when we send you an electronic communication, such as clicks on links. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

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. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

Uses made of the information

We use information held about you in the following ways:

Information you give to us.

We will use this information:

- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- To provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- To provide you, or permit our company to provide you, with information about goods or services we feel may interest you. Our company are providers of goods and services related to our services, for example, but not limited to, Security Shredding services, Transportation for Secure Shredding, Waste electrical and electronic equipment services and Archive Storage services. If you are a new customer, and where we permit our company to use your data, we will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the enquiry form, order form or registration form);
- To notify you about changes to our service;
- To ensure that content from our site is presented in the most effective manner for you and for your computer.

Information we collect about you

We will use this information:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our site to ensure that content is presented in the most effective manner for you and for your computer;

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• To allow you to participate in interactive features of our service if applicable, when you choose to do so;

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- As part of our efforts to keep our site safe and secure;
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Information we receive from other sources.

We may combine this information with information you give to us and information we collect about you. We may us this information and the combined information for the purposes set out above (depending on the types of information we receive).

Disclosure of your information

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in NW10). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.
- Analytics and search engine providers that assist us in the improvement and optimization of our site.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Thames Security Shredding or substantially all of their assets are acquired by a third party, in which case personal data held by it about its customers may be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of Restore plc, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

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Where we store your personal data

The data that we collect from you may will not be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Your rights

We will ensure that we obtain all necessary appropriate consents to enable lawful processing and transfer of your Personal Data. You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at https://www.thamessecurityshredding.com.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Our obligations

We will ensure that we have in place appropriate technical and organisational measures, reviewed and approved by us regularly, to protect against unauthorised or unlawful processing of Personal Data and against accidental loss or destruction of, or damage to, Personal Data, appropriate to the harm that might result from the unauthorised or unlawful processing or accidental loss, destruction or damage and the nature of the data to be protected, having regard to the state of technological development and the cost of implementing any measures (those measures may include, where appropriate, ensuring confidentiality, integrity, availability and resilience of our systems and services, ensuring that availability of and access to Personal Data can be restored in a timely manner after an incident, and regularly assessing and evaluating the effectiveness of the technical and organisational measures adopted by us).

We will ensure that all personnel who have access to and/or process Personal Data are obliged to keep the Personal Data confidential.

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We will not transfer any Personal Data outside of the European Economic Area unless the following conditions are fulfilled:

- We and the Provider have provided appropriate safeguards in relation to the transfer;
- You have enforceable rights and effective legal remedies;
- The Provider complies with its obligations under the Data Protection Legislation by providing an adequate level of protection to any Personal Data that is transferred; and
- The Provider complies with reasonable instructions notified to it in advance by us with respect to the processing of the Personal Data.

We will ensure we comply with our obligations under the Data Protection Legislation with respect to security, breach notifications, impact assessments and consultations with supervisory authorities or regulators.

We will notify you without undue delay on becoming aware of a Personal Data breach; At your written direction, we will delete or return Personal Data and copies thereof to you unless required by Applicable Law to store the Personal Data.

We will maintain complete and accurate records and information to demonstrate our compliance with this policy.

Access to information

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you. We will respond promptly to any access request made by you.

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to GDPR Officer, Thames House | Paycocke Road | Basildon | SS14 3AP.