

## Customers Privacy Notice

### WEEE Take-Back Program

This Privacy Notice applies to consumers requesting our services on this web portal.

#### Who Are We?

This Privacy Notice tells you how HH Compliance Ltd (data processor) processes on behalf of the ONLINE SELLER (data controller) ("we", "our", or "us") the personal data of its customers.

It also tells you how you can exercise your rights (including the right to object to some of the data handling we carry out). More information about your rights and how you can exercise them is set out in the "Your Rights" section below. We also may provide you with additional information when we collect personal data, where we feel it would be helpful to provide relevant and timely information.

#### What Personal Data We Collect

We process the following types of personal data in connection with the work we do for you to the extent and as required/allowed and under applicable (local) laws:

- **Contact & identification information:** such as your name, preferred language, address, phone, email, contact details (phone, email, and physical address).
- **Your order ID purchase**
- **Any other information you submit to us** (including during the course of any correspondence you may have with us)

#### Why We Collect, Use and Store this Personal Data

We collect, use and store your personal data for the reasons set out below.

- **Where it is necessary to provide you with take-back services;**
- **Where it is necessary for the ONLINE SELLER to comply with its take-back or reporting obligations;**
- **Where necessary to comply with another legal obligation** (for example disclosures to law enforcement agencies or in connection with legal claims, regulatory, investigative purposes (including disclosure of such information in connection with legal process or litigation).
- **Where necessary for our legitimate interests, and where our interests are not overridden by your data protection rights.** Protecting our legitimate business interests and legal rights. This includes, but is not limited to, use in connection with legal claims, compliance, regulatory, auditing, investigative and other ethics and compliance reporting requirements.

We will retain your personal data only during the provision of the service and for a period of 6 (six) months thereafter in accordance with applicable law, to perform a service at your request or your employer's request, or to meet a legal requirement, after which we will take steps to delete your personal data or hold it in a form that no longer identifies you.

#### How We Share Your Personal Data

We share some of your personal data with ONLINE SELLER's and with companies providing services to us, such as subcontractors (our logistics providers, parcel service companies or other subcontractor in charge of collecting the waste from you), auditors or advisors on a need-to-know basis only as well as with help desk providers and IT hosting and/or IT maintenance providers or companies monitoring or involved in maintain or developing our IT tools. We may share additional information with certified companies in accordance with ONLINE SELLER's instructions.

#### Your Rights

You have the right to access your personal data (Art. 15 GDPR); to update/correct, delete or restrict (stop any active) processing of your personal data (Art. 16- 18 GDPR); and to obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format, and to ask us to share (port) this data to another controller (Art. 20 GDPR).

In addition, you can object to the processing of your personal data in some circumstances (where we don't have to process the data to meet a contractual or other legal requirement - Art. 21 GDPR). These rights may be limited,

for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

### **Contact Us and Your Rights of Complaint**

If you have questions about this Notice or wish to contact us for any reason in relation to our personal data processing, please contact the Data Protection Officer (DPO) of the ONLINE SELLER. When addressing the DPO of the ONLINE SELLER, please always provide your name, address and/or email address as well as detailed information about the change you require or question you would like us to answer. If you have a concern about the way we handle your personal data you have the right to complain to the Data Protection Authority of your habitual residence, place of work or place of the alleged infringement.

### **Data containing Devices**

Through this Program we collect and recycle waste electrical and electronic equipment.

We do not wish to process personal data that is contained in waste electrical and electronic equipment (“**Data-Containing Devices**”) which is given to us, whether directly by third parties for reuse, recovery or disposal operations in the course of that Service and our preference is that you follow our recommendation and permanently erase all personal data from the Data-Containing Devices before we receive it. Where you choose to leave personal data on the Data-Containing Device provided to us, we might then gain possibility to access to whatever is contained on Data-Containing Devices. Where Data-Containing Device you provide us include personal data relating to other people, we ask you to only do so after making sure that erasure or destruction of this data complies with applicable laws.

We collect Data-Containing Devices solely to process them for re-use (by approved and regulated re-use organizations), or for recycling by our contractors. Our day to day processes do not include accessing Data-Containing Devices or the personal data contained in them. In all situations, our only processing of personal data contained in Data-Containing Device will be permanent erasure (in case the Data-Containing Device is prepared for reuse) or the destruction (in case the Data-Containing Device is destroyed and recycled into component parts) at our contracted facility which does not process any data in the Data-Containing Devices on our behalf. We use a variety of security technologies and operational procedures to help protect your personal information from being accidentally altered, disclosed, lost, used or accessed in an unauthorized way. However, if you have handed over Personal Data of you or others against our recommendations, we cannot be held responsible for any unauthorized processing of your data by ill-intentioned people.

Because our processing of personal data contained in Data-Containing Devices does not require the identification of data subjects, we are not required to either (a) maintain, acquire or process additional information in order to facilitate such identification; nor (b) grant rights of access, rectification, erasure, restriction of processing, or data portability to you. Due to the nature of our activity and the volume of Data-Containing Devices which we process, it is in any event near-impossible to identify any specific individual from the Data-Containing Devices we hold even if you provide us with additional information.

We reserve the right to modify and amend this Privacy Policy from time to time to reflect current circumstances. We therefore recommend that you review this Privacy Statement regularly to keep up to date. Where required by law, we may also inform you about modifications/amendments of this Privacy Policy. This Privacy Statement was last updated on November 25, 2021.