

Privacy (FAIR USE) STATEMENT: STARRUS ECO HOLDINGS LIMITED T/A PANDA ("PANDA")

1. Panda and your personal information

Panda respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you use our Services (waste collection services and skip services) and tell you about your privacy rights and how the law protects you.

Panda is the Data Controller in relation to the personal data you supply to us. Panda is part of the Beauparc group of companies. See more details at www.beuparc.ie.

2. Personal information we collect

We collect the following types of personal information from you:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier and details of other people linked to your account.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details and history.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Records of your discussions with customer support teams, including call recordings Data** when you share comments and opinions with us, ask us questions or make a complaint, including when you phone us, we will keep a record of this. This includes when you send us emails, letters, phone our support team or contact us through social media.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Credit Data** includes data and information that allows us to understand your creditworthiness.
- **Data on how you use mobile applications and websites:** when you use our applications or websites, we collect information about the pages you look at and how you use them, your device type, operating system and browser type.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect, save for certain health related data required to be categorised as Vulnerable Customer, any **Special Categories of Personal Data** as defined by General Data Protection Regulation 2016/679 about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect 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 (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED BY PANDA?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data , Vulnerable Customer Status Data, Recordings Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you
 - apply for our products or services from Panda;
 - create an account on our website or one of our Apps;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enable us to deal with customer queries or issues you may have relating to the service; or
 - give us some feedback.

Other entities/companies we work with: provide us with information to help us deliver our products and services to you. These include:

- **Companies in the Beuparc Group** who may provide relevant information about the products and services bought from them
- **Payment Service providers-** if you authorise a third party to process your bill payments, Financial Data will be provided to us from that third party.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, [server logs] and other similar technologies.
- **Third party utility “sign up” providers** - third party companies, not affiliated or owned by Beuparc which allow you to sign up with us as an waste collection company give certain data specified in clause 2 above , where you give permission to them to pass the Data to us , with your consent/permission, from other waste providers suppliers to switch to us.

4. What we use your personal information for and why

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract (ie, the provision of domestic waste collection and disposal services) we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at the above address.

5. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact the Panda Privacy Officer per below at clause 9 if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
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		including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact (C) Vulnerable Customer Status Data	(a) Performance of a contract with you (b) in accordance with Social protection laws laws re waivers
To process and deliver our Services: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications (f) Vulnerable Customer Status Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) c) in accordance with Social protection laws laws re waivers.
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
Detecting, preventing or investigating crime or suspected crime (pursuant to our license obligations and the Energy (Miscellaneous Provisions) Act 2012)	The personal data we use will depend on the nature of the problem. At a minimum, it will include your contact details and account history	(a) Necessary to comply with a legal obligation
Staff Training	All personal information we collect as listed in	Necessary for our legitimate interests

	Section 2 (but not your payment details)	(to ensure highest standards and quality assurance purposes)
Complying with obligations imposed by our regulators	The personal data we use will depend on the nature of the issue but will often include all the data listed in categories of section 2 above (not including Marketing Data)	(a) Necessary to comply with a legal obligation

Internal and statutory audits	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications (g) Vulnerable Status	(a) Necessary to comply with a legal obligation (B) Necessary for our legitimate interests
Attending to emergency situations (pursuant to our license obligations)	(a) Identity (b) Contact (c) Usage	Necessary to comply with a legal obligation (as per our licence obligations)
Making credit decisions	(a) Identity (b) Contact (c) Financial	(a) Necessary for our legitimate interests (to mitigate against risks of bad debt)

Where we process your personal data so you can't be identified any more

We may anonymise and aggregate any of the personal data we hold (so that it does not identify you). We may use anonymised and aggregated information for purposes that include testing our IT systems, research, data analysis, improving our site, apps and developing new products and services.

6. Who we share your personal information with

We share personal information with the following parties. We always have contracts in place with these entities, obligating them to protect your data:

- **Companies in the Beuparc group:** to provide a service to you, and for cross-marketing activities (where you have given us your express consent or in accordance with your marketing preferences.)
- **Other service providers and advisors:** companies that support our IT, help us analyse the data we hold, process bills and payments, send communications to our customers, provide us with legal or financial advice, carry out debt collection services.
- **Purchasers of our business:** buyers or prospective buyers who we sell or negotiate to sell our business to.
- **Government bodies or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives, or are part of industry information sharing schemes, including the Data Protection Commission, Environmental Protection Agency, WERLA.
- **Industry supervisory bodies:** we may pass your information on to organisations that supervise the industry.
- **Garda Síochána and law enforcement agencies:** to assist with the detection, investigation and prevention of crime.
- **Other bodies or service providers:** if you are vulnerable customer we may share your details with other entities if we become aware that you require assistance.

7. Direct Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

PROMOTIONAL OFFERS FROM US

From time to time, Panda may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

We will only send marketing messages to you in accordance with the marketing preferences, ie those that you have confirmed to us when setting up your account or alternatively you tell us afterwards you are happy to receive.

OPTING OUT

You can also unsubscribe from our marketing by following the unsubscribe instructions in email or SMS communications that we send to you. Further You can ask us to stop sending you marketing messages at any time by Panda Privacy Officer (details below clause) at any time.

8. Transferring your personal information internationally

In certain circumstances, we may transfer your personal information internationally, including outside of the European Economic Area (EEA). Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will 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. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the

Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please contact our Privacy Officer if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. YOUR LEGAL RIGHTS

Right of Access

You have the right to ask for a copy of your personal information which Panda holds. Any such request must be in writing.

Right to update or delete data

You are entitled to have your personal information corrected (if it is inaccurate) or erased (if we do not have a legitimate reason for retaining that information). You may inform us of any changes in your personal information, and in accordance with our obligations under the GDPR, we will update or delete your personal information accordingly. Please note, however, that if we delete your personal information it may not be possible for us to fully enable you to access all information regarding our products or services which you may request.

If you wish to avail of any of these rights, you should submit a written request to:

**Privacy Officer
Panda Waste Management Solutions
Ballymount Road Upper
Dublin 24
D24 E097**

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. REVISIONS TO PANDA PRIVACY (FAIR USE) STATEMENT

Panda may revise this Privacy Statement from time to time. Changes to this Privacy Statement will be posted here so you should periodically check this page to review the most recent and up to date Privacy Statement