



PRIVACYPOLICY

INTRODUCTION

This Privacy Notice is issued on behalf of Starrus Eco Holdings trading in Ireland as Panda which we may hereto refer to as "Panda" "Panda Group" "we" "us" or "our".

Information contained in this Privacy Notice is directed towards Panda website users and waste utility customers to inform them about their privacy and consumer rights.

CORPORATE INFORMATION

Panda is a trading name of Starrus Eco Holdings Limited, an Irish company, registration number 527552 with a registered business address at 24 Ballymount Road Upper, Ballymount, Dublin D24 E097.

We respect your privacy and are committed to protecting your personal data. This Privacy Notice will inform you about how we collect and process your personal data when you use our services and or visit our websites (regardless of where you visit it from).

Panda services and websites are not intended for use by children (16 years and below). We do not knowingly collect children's data through our websites or utility services.

The terms of our Privacy Notice apply to Panda customers and website users in Ireland who avail of Panda residential waste disposal services and residential skip services, ordered in a personal capacity for domestic use. This Privacy Notice also applies to personal users of Panda commercial services and websites and to those accessing such services from abroad for request of services delivery in Ireland.

THE LAWFUL BASIS FOR OUR DATA PROCESSING

The lawful basis for processing of personal data is the performance of our service contract with you. It may be necessary at times to contact you about service changes; we refer to these in the Customer Agreement as Service Information, which we consider necessary to the performance of our contract with you. At other times we will only contact you where you provide your consent to marketing (Marketing Information) a separate service delivery that requires your consent to deliver.

PROTECTION OF YOUR RIGHTS

We protect your rights when we collect and process your personal data. We do so in accordance with the following laws:

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| Regulation 2016/279 the General Data Protection Regulations (GDPR) |
| The Data Protection Act (2018) |

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| The European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011, as amended (the “ ePrivacy Regulations ”) |
| The ePrivacy Regulations outline specific rules about the use of cookies, marketing communications and security of electronic communications networks and services. |
| **The ePrivacy Regulations were amended by the European Union (Electronic Communications Code) Regulations 2022 |
| The EU AI Act |

***Some revision of the above legislation will be updated accordingly from time to time in this policy.**

PANDA AS DATA CONTROLLERS

When Panda collects your personal data, we are Data Controllers defined in accordance with GDPR and the Data Protection Act (2018). Users of Panda Services in Ireland and or those accessing the Panda websites will be subject to the applicable laws of Ireland. As a data subject you have rights relating to the management of your personal data and this is set out elsewhere in this policy.

SHARING YOUR INFORMATION

We rely on trusted third parties to help us run our business and to provide us with specialised services. We may share your information for the purposes of delivering our services.

Our contracted third-party companies may assist you with support enquiries you have when you contact Panda as well as provide administration services, upload letters we receive from our customers and provide general account administration and customer care support services. To assist our customers better we have customer teams located in Ireland and the Philippines.

TRANSFERS OUTSIDE THE (EEA) REGION

We use third party customer support services located in the Philippines. These services are bound by comprehensive local data privacy legislation that is governed and regulated by the Philippines Data Privacy Regulatory Authority. Our relationship with our third-party providers is also regulated by a contractual relationship that includes standard contractual clauses, issued and approved by the European Commission.

BROWSING THE PANDA.IE WEBSITE



When you interact with the Panda.ie website (where this Privacy Policy is published) we collect information about how you interact with the website. We collect this information to understand how we can improve user experience and do not knowingly collect information outside of necessary use cookies. Our Cookies policy applies to such use and is also posted to our website.

HOW WE PROCESS PANDA CUSTOMER DATA

For our residential customers to whom this Privacy Notice also applies, we process your data under contract by using a Customer Relationship Management (CRM) system. We segregate commercial information from residential system capture. This is done to ensure customer personal data is not accessible or shared throughout the business unnecessarily and to minimize privacy harm that could result from wider sharing.

So that we may deliver an accurate service to your residential address that is linked to your account, we assign your bin a unique identifier (bin tag). This ensures your privacy where we may launch projects that assess bin waste segregation percentages. Any image capture associated with pilot programs are directly linked to your account in our system. Any image captures are privacy protected and subject to our Information Security and Cybersecurity Policies. The lawful basis for processing your bin waste is a legal obligation. Processed data is not shared with third parties other than those specified in this document and will only be retained for the lawful period set out in this document.

We use several different systems streams in the customer services to ensure the security and privacy of your personal data. Below are IT systems which operationally used to process your data and licenced to us by AMCS Group Ireland.

| Application Name | Supplier | Hosted | Purpose |
|---------------------------|-----------------------|------------------------------|------------------------------|
| AMCS Dataset order system | AMCS | Panda | Order processing & Invoicing |
| Diver BI | Diver BI | Panda | Data Analysis |
| AMCS Routeman | AMCS | Panda | Vehicle Weighing |
| Binweigh | VPG On board Weighing | Panda | Vehicle Weighing |
| WIS | WIS | WIS using Hetzner | Vehicle Weighing |
| BXP CRM | BXP | BXP using AWS | Contact Management |
| Luware Nimbus | Telcom | Luware using Microsoft Azure | Phone Management |

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|--|---------------------------|--|--|
| Selecta Waste Image Software | Green Eyed Vision Limited | Panda NAS servers | Contaminated Waste Image Review |
| Website: Portal Pages for Direct Sign Ups: www.panda.ie/panda-home/sign-up/ & Portal Page for Field Sales. D2D Panda | Big Dog Digital. | WP Engine using AWS | Customer Acquisition |
| Website – Customer Portal 2 Developed 2023. www.my.panda.ie | Big Dog Digital. | WPEngine using AWS | Customer Care |
| Original Customer Portal which is still active at 02/09/24 www.mypanda.ie | AMCS | AMCS using Azure | Customer Care |
| Customer Apps: Panda Android: Panda Waste – Apps on Google Play Panda Apple: Panda Waste on the App Store (apple.com) McElvaney's Android: McElvaney's Waste & Recycling - Apps on Google Play McElvaney's Apple: McElvaney Waste on the App Store (apple.com) | AMCS | AMCS hold all compilation files & manage updates to all. | Customer Care |
| Cloud Replica of AMCS Dataset Database. Copy of live Database is synced to this cloud location. API connections for customer portals and apps link to this location | AMCS | AMCS using Azure | Customer Care. Data source Data for customer portal and app) |
| Phonovation Web App | Phonovation | | Adhoc Customer texting |
| Mailchimp Web App | Mailchimp | | Adhoc Email campaigns |

PAYMENT PROCESSING



We process your financial details which include personal data for payment purposes. We use the below payment processing methods.

| Pay Method | Payment Processed |
|--------------------------|--|
| Direct Debit | Direct Debit Mandate |
| Pay By Card | Through IVR, Website Portal & App, Over the phone with Agent |
| Payzone Card | An Post & Participating Retail outlets |
| Electronic Bank Transfer | Less Frequently Used Method |
| Cheque | Less Frequently Used - Post to Credit Control Office |
| Cash | Less Frequently Used & Discouraged - Offices & Depots |

INTERNATIONAL CUSTOMER SUPPORT

Our main Panda customer support team operates from Ireland, and we engage a support customer services team located in the Philippines. Our outsourcing provider is YourTeam and the local employer of staff is KMC Mag Solutions, registered as required by law with the Data Protection Authority of the Philippines, the National Privacy Commission. More information about the legal authority can be found on <https://privacy.gov.ph>

Engaging overseas teams to work with our customers is provided for in European legislation once a set of steps has been taken to mitigate and address any customer risk to processing. These regulatory and compliance steps have been undertaken to ensure your privacy is always protected. Overseas operators assisting our customers only access customer information through a Virtual Desktop Infrastructure (VDI) which has centralised information storage, multifactor authentication and minimises data breaches as it not a live system of access but incorporates a delay that allows for information security management. We have a close relationship with our team in the Philippines who complete digital privacy and customer management service training and adhere to our policy and procedures.

Systems and information access is fully restricted to the authorised persons with management controls administered from by our ICT team in Ireland. The scope and nature of processing is regulated under contract and staff whether in Ireland or the Philippines are subject to the same rigorous training standards in security and customer management.

The VDI system ensures the integrity security and privacy of core centralised datasets and ensures that control of host data servers, always remains within Europe and subject to European data protection and privacy legislation.

DATA RETENTION

We retain information related to your account transactions for 7 years, this is required by law. Where you contact us with respect to your customer account, we record this information into your account details stored on our CRM system. The lawful basis for this retention period is the Statute of Limitations Act 1957 which defines the period contract terms may be legally disputed

in court. We may retain personal data for a longer period where we are under a legal obligation by a lawful authority to do so.

WASTE IMAGE SERVICE PROCESSING

Our Agreement with you refers to our Contamination Detection System (CDS). CDS is where waste images may be taken of household waste and where a contaminant is identified are attached to a customer's account for a period of one year. Contaminated Waste Images may only become personal data where a contaminant is identified, and images are attached to a customer account in our system. Where no contaminants are identified by CDS, no images will be attached to a customer account.

Images not attached to a customer account will only be retained for a period of one month where, after a period of one month are deleted by automated server deletions. Where CDS identifies a waste contamination event images are retained for a period of twelve months. The reason for this period of time is the requirement for analysis of the service introduction and to assess the service introduction efficacy.

Where we retain and store your personal data for a period longer than 7 years by request of an authorised authority it is inaccessible to general use by decentralised and encrypted storage.

When you phone our customer services team we may or may not record the call. Only a small selection of recordings is captured for training purposes. Calls are deleted after one month from the time of call. As such we cannot provide phone call recordings by customer request where recordings do not exist, where data is not retained and or where a recording was deleted after one month.

OUR CONTRACT TERMS AND CONDITIONS

Your rights as a consumer include transparency and fairness in contract. Your consumer rights also include clarity around how your data is collected and processed by Panda and how Panda offer and manage your Panda services contract. Our contracts provide the following details to Panda residential customers:

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| <ul style="list-style-type: none">• Panda's business name, address, phone number, email address and other online communication channels |
| <ul style="list-style-type: none">• Service details |
| <ul style="list-style-type: none">• Total price or how it is calculated, or personalised price (if relevant) |
| <ul style="list-style-type: none">• Length of the contract |
| <ul style="list-style-type: none">• For services with no fixed timescale, cost per billing period or per month |

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|--|
| <ul style="list-style-type: none">• Details on payment and performance |
| <ul style="list-style-type: none">• Right to cancel |
| <ul style="list-style-type: none">• How you can cancel the contract if it does not have a fixed length or automatically renews |
| <ul style="list-style-type: none">• Conditions that apply to deposits (if applicable) |

OUR PANDA SERVICES CONTRACT

If you agree to a Panda services contract, you will receive a copy of the signed contract or confirmation within 5 working days of service purchase. Where you purchase a commercial skip as an existing residential customer, we will protect your privacy rights and respect your marketing choices associated with an existing customer account. Where you book a commercial skip as a new Panda customer our telephone agents and online website will ask for your consent to receive marketing information.

Panda must act fairly and transparently when we are managing your residential contract for service. If you feel we could do better with respect to upholding your consumer rights, please let our customer care team know at;

customer.support@panda.ie

customer.service@panda.ie

For further information about your consumer rights please visit www.ccpc.ie

PANDA WEBSITE USAGE

Our website <http://www.panda.ie> hosts two customer functions 'My Panda Login' portal and 'Sign Up'. My Panda Login is a portal that processes current Panda Customer personal data and allows the Customer to view account details, make payments, view account information and if the customer has downloaded the Panda App, enables the customer to receive service information and updates directly to their phone.

Our Panda website 'Sign Up' function provides potential customers with ways in which is resolve queries or sign up to Panda service contracts. Potential customers can contact us by online, by phone, email, live chat or social media. Where a potential customer contacts us via social media, the privacy terms of the social will govern the communication sent to us on that social media platform.



Our Panda website offers two sections one appropriate residential section and a commercial section. Panda residential customers who enter their personal details into the commercial section of the Panda website will have their personal data processed in accordance with this Privacy Notice.

It is important that Panda service users correctly use our websites to place orders so that we may protect personal rights of service users. Where you give consent to receiving marketing consent, you can withdraw this consent at any time by unsubscribing, by email to us or by contacting a Panda agent. You can do this by emailing us at customercare@panda.ie or phoning us at 01-8298992 during regular business hours.

For clarity, we may need to contact you about important service information updates. We define service updates as useful information related to your Panda service order. This can include utility services date and time cost changes, schedules, and related information about service changes. We may contact you at your preference about service updates by either phone text, e-mail or app message.

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. In addition to Panda service users, this Privacy Notice is intended to apply to the website users of the following Starrus Eco Holdings Limited company websites.

– www.panda.ie

– www.mypanda.ie

The www.mypanda.ie app currently allows Panda Customers to access account information and pay bills. This App is downloaded from the Apple Store or Google for android phones. When downloading from either Apple or Android the relevant privacy terms for each download will apply. For the Panda services information and customer content access and processing following either download, the terms of this Privacy Notice will apply. We do not knowingly share your personal data contained within the App with either entity.

PANDA WEBSITE LINKS TO THE CAREER PORTAL

Panda uses <https://www.panda.ie> to advertise employment vacancies. This section of our website is hosted by E-Ploy our recruitment software partners who process candidate applications which are forwarded to our HR team for review. When you follow the link to the career's portal, a separate data processing notice will inform you about our relationship with E-Ploy and how we process recruitment application submissions via our website.

DATA SHARING REQUESTS

As we are licensed to deliver a public utility service, we are subject to personal data disclosures to relevant and authorised public authorities at their request and where they evidence a legal

basis for us to share personal data. Public authorities are authorised to ask us to share personal data by section 38 of the Data Protection Act (2018) once they provide a legal basis to do so.

Where we do share personal data, we rely on our legal obligation to do so or where the performance of the task is necessary to carry out in the public interest and to comply with a legal obligation. Examples of third-party sharing are County Councils, Environmental Inspectors, local authorities, tax authorities, enforcement authorities and Gardai. Where we are asked to share your personal data by a lawful authority we must comply with law.

When you use our websites, we collect personal information that informs us about browsing use of our website. This is to enable and inform our understanding about how we may improve our website service offerings. All website user cookie consent is captured and recorded before you enter our website to browse. For further information about third party cookies please check on our website cookie banner for details.

PANDA CORE PRINCIPLES

We must act in accordance with GDPR when controlling and processing your personal data. These are.

1. Fair Lawful and Transparent Processing
2. Purpose Limitation
3. Data Minimisation
4. Accurate and up to date processing
5. Data Storage Limitation
6. Security and confidentiality
7. Accountability

WHEN WE COLLECT YOUR PERSONAL DATA

We may collect and process your personal data in multiple ways. Our door-to-door sales teams may collect your personal data when you give your information to a sales team member in relation to a service.

We may collect your personal data when you telephone or email our customer services about your account and or where you submit your personal data on our website when you request a Panda service. Where you telephone our customer services with an enquiry, we enter that contact into a system that also records your personal account details.

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| a. subscribe to our service or publications. |
| b. Sign up to Panda services during door-to-door sales |
| c. Contact us about withdrawing your consent to marketing. |

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| d. request marketing communications to be sent to you. |
| e. enable us to deal with customer queries or issues you may have relating to the service; or give us some feedback by phone, email or via the Panda website. |
| f. via Intercom Livechat functionality (via Intercom Third-Party Application) |
| g. Cookies and similar technologies: 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. Cookie data captured via performance cookies is only captured if you have provided prior proactive consent to this, via the cookie banner. For more information on our use of cookies, please visit our cookie policy. In respect of Cookies (performance)- Internet Protocol (IP) Addresses (location data) is collected if the user consents to various cookies and consent provided on a granular level in the cookie banner. |

We may also collect your personal data where you make a direct payment to use one of our recycling centres or where you attend a tour of one of our recycling sites.

CCTV

For security reasons, where you attend a Panda utility services site as a customer, employee, visitor or contractor you will be recorded by CCTV. A separate CCTV Policy applies to the recording of personal data which we can provide by request.

Our fleet, for safety reasons have dashboard and reverse cameras installed. They record only where an incident or event occurs. This information may be shared with a public authority or by order of the court upon request.

PANDA AS DATA CONTROLLERS

Where we collect your personal data for our services delivery, we act as Data Controllers. This means that we are directly responsible for the processing of your personal data. Where we process your personal data as secondary contacts, we act as Data Processors. At any one time we may act as either Data Controllers and or Data Processors.

A data controller determines the purposes and means of processing personal data. In other words, the data controller decides the how and why of a data processing operation. A data controller can be a legal person, which in our case is Starrus Eco Holdings Limited trading as Panda.



PANDA AS DATA PROCESSORS

Third party operators with whom Panda has a contractual relationship and who process Panda data to assist us deliver our services act as Data Processors as defined by GDPR.

Some of our data processors are overseas, as earlier described and we ensure that a Data Protection Impact Assessment is conducted on all processing activity. A full list of our data processors is available upon request to our Privacy Officer.

CONTACT DETAILS

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| Privacy Officer Starrus Eco Holdings Limited Panda Waste Management Solutions Ballymount Road Upper Dublin 24 D24 E097 |
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| Email: Privacy.Officer@pandagreen.ie |
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We have appointed a Panda Privacy Officer responsible for answering questions in relation to this Privacy Notice.

If you have any questions about this Privacy Notice, please contact the Privacy Officer using the details set out below. Your privacy rights are especially important to us, and we are happy to answer any privacy related queries that may arise about your data.

In accordance with law and due process, you should contact our Privacy Officer first with your request before contacting the Data Protection Commissioner. This allows us time to address and resolve your complaint.

Should we not respond in a satisfactory manner customers have the right of complaint to the Data Protection Commissioner.

We respond to all subject access requests within **one month**. In very limited circumstances, it may take us longer than a month if your request is particularly complex. In this case, we will notify you and keep you updated. Where we do not have the personal data you request, does not exist or may be protected by legal privilege, we will inform you of this at the time of releasing your request for personal data.

This Privacy Statement is subject to annual audit and will be updated accordingly. 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.

Contact details for the Data Protection Commissioner Office

If, after engaging us you feel that we have failed to respond to or have not sufficiently responded to your request with respect to your individual rights, you have the right to lodge a complaint with the data protection authority in Ireland, the Data Protection Commission (DPC)

Data Protection Commission,
21 Fitzwilliam Square South
Dublin 2
D02 RD28
Ireland

Email: info@dataprotection.ie
Website: www.dataprotection.ie

**CUSTOMER
ACCOUNT CHANGE
REQUESTS**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if elements of your personal data, for example related to your account management, changes during your relationship with us. For your convenience, this policy is updated and will



be audited annually to align with company operations. Please ensure that you revisit the website to keep informed of any changes and or updates to our privacy management.

NON-TRANSFER OF ACCOUNTS

We cannot transfer Panda services accounts from one personal account to another name. In this regard we request Panda account users to close their account and open a new account in the new name immediately submitting their details in a new application process so that services are not interrupted.

Additionally, persons will not be added to an account upon request once an account has been opened in a name and request a new account is opened in place of name transfers.

DATA CATEGORIES

We may collect, use, store and transfer various kinds of personal data about you which we have grouped together follows:

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| Identity Data includes first name, birth name, last name, username or similar identifier. |
| Sensitive Data: data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health. |
| Audio Data may include the recording of inbound and outbound calls used to evidence our contractual agreement with you, for dispute resolution, training and quality purposes. |
| Contact Data includes billing address, delivery address, email address and telephone numbers. |
| Financial Data includes bank account and payment card details. |
| Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, digital bin tags, operating system and platform and other technology on the devices you use to access this website. |
| Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses. |

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| Work History Data which may include where you worked and personal references when submitted through the career portal on the Panda website |
| Usage Data includes information about how you use our website, products and services. |
| Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences. |

We do not in general collect, in most cases, any **Special Categories of Personal Data** about you. Special category data includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

Where we may collect Special Categories of Personal Data about you is where such data is voluntarily disclosed by you to a customer service agent in relation to management of your Panda customer account or service delivery.

An example of such disclosures may be the necessary processing of medical details in relation to the delivery of services to vulnerable Panda customers. The lawful basis for the processing of your special category data is your consent. All sensitive data is encrypted in our CRM with access limited to your account. Special category data may be subject to deletion at your request when no longer relevant to the delivery of your services. Where this is the case, we advise you to contact our customer services team and request such deletion when appropriate so that we are not processing your data which is no longer necessary to deliver your services.

We may collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose from data collected from your engagement with our website. Aggregated Data may be assessed 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 processed in accordance with this privacy notice.

HOW YOUR PERSONAL DATA IS COLLECTED

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

Direct interactions: You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

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| Create an account on our Panda.ie website. |
| If you submit a CV on our Career section |
| Provide your details to our door-to-door sales team |
| Call our customer services team |
| Browse our panda.ie website |
| Download our App and use its functions |
| Subscribe to our service or publications. |
| Request marketing communications 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. |
| Via Intercom Livechat functionality (via Intercom Third-Party Application) |
| Cookies and similar technologies: 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. Cookie data captured via performance cookies is only captured if you have provided prior proactive consent to this, via the cookie banner. For more information on our use of cookies, please visit our cookie policy. In respect of Cookies (performance)- Internet Protocol (IP) Addresses (location data) is collected if the user consents to various cookies and consent provided on a granular level in the cookie banner |

PERSONAL DATA LAWS

We will only use your personal data in line with National (Data Protection Act 2018 (Ireland) and European (GDPR) data protection law and only to achieve the specific purpose of the processing in each case. Most commonly, we will use your personal data in the following circumstances:

- a) Where we need to perform the service contract we are about to enter or have entered with you.
- b) Where it is necessary for our legitimate interests to provide Panda services to the highest standard and efficiency.
- c) Where we need to comply with a legal or regulatory obligation.
- d) Where you have provided explicit prior consent to receiving electronic direct marketing communications.

In general, we do not rely on consent as a legal basis for processing your personal data other than for direct marketing communications through email or text message via retained third-party

partners. As mentioned, electronic marketing communications are only sent to you if you have provided explicit prior consent via a tick box on our website.

You have the right to withdraw consent to marketing at any time by contacting Panda customer services at customer.service@panda.ie or by calling our customer services number.

PURPOSE OF PERSONAL DATA PROCESSING

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 grounds 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 as per above if you need details about the specific legal grounds, we rely on to process your personal data where more than one ground has been set out in the table below.

| Purpose/Activity and Art 6 GDPR Lawful Basis | Type of data we ask for and process | Lawful basis for processing including basis of legitimate interest |
|---|---|--|
| To register you as a new customer (Article 6(1)(b)) (<i>Processing necessary for the performance of a contract</i>) | (a) Identity (b) Contact (email or contact no.) (c) Audio | Performance of a contract with you which includes identity validation for legitimate services for citizens of Ireland with a right to residency. |
| To process and deliver your order including:(a) Manage payments, fees and charges(b) Collect and recover money owed to us (Article 6(1)(b)) (<i>Processing necessary for the performance of a contract</i>) (Article 6(1) (a) (<i>Data Subject has provided consent to the processing</i>)) | (a) Identity (b) Contact (c) Financial (d) Transaction | (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) |

| | | |
|--|--|---|
| | <p>(e) Marketing and Communications</p> <p>(f) Audio</p> | |
| <p>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</p> <p><i>(Article 6(1)(f) processing is necessary for the purposes of the legitimate interests pursued by the controller)</i></p> <p>Sending Contamination notices to customers by letter and or by post when contaminated items are discovered within recycling bins <i>Article 6(1)(f) processing is necessary for the purposes of the legitimate interests pursued by the controller</i></p> <p>Contacting customers to inform them about changes to services such as billing, collection dates and times, services interruptions and or cancellations “Service Information”</p> | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> | <p>(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) (a) Necessary for our legitimate interests to ensure that our recycling bins remains free contamination</p> |
| <p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p> <p><i>Article 6(1)(f) processing is necessary for the purposes of the legitimate interests pursued by the controller</i></p> | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Transaction</p> <p>(e) Financial</p> | <p>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 the merger & acquisition group restructuring exercise) (b) Necessary to comply with a legal obligation</p> |

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|--|---|--|
| <p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p> <p><i>Article 6(1)(f) processing is necessary for the purposes of the legitimate interests pursued by the controller</i></p> | <ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Usage (f) Technical (g) Audio | <p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p> |
| <p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p> <p><i>Article 6(1) (a) (Data Subject has provided consent to the processing) (Consent required in respect of performance cookies that collect personal data)</i></p> | <ul style="list-style-type: none"> (a) Technical (b) Usage (c) Marketing and Communications | <p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p> |
| <p>To make suggestions and recommendations to you to help improve our service</p> <p><i>Article 6(1)(f) processing is necessary for the purposes of the legitimate interests pursued by the controller</i></p> | <ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile | <p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p> |

| | | |
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| <p>To deliver our Services to you under the Agreement Article 6 (1)</p> | <ul style="list-style-type: none"> (a) Identity (b) contact (c) Technical (d) Usage (e) Transaction (f) Financial | <p>processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract with Panda</p> |
| <p>Sharing information with Revenue, law enforcement agencies, local authorities and other relevant state bodies Article 6(1)(c) <i>processing is necessary for compliance with a legal obligation to which the controller is subject</i></p> | <ul style="list-style-type: none"> (a) Identity (b) Contact (c) Financial (d) Transaction | <p>To comply with our legal obligations under national and member state law and for the prevention, investigation, and detection of criminal activity</p> |

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. Any marketing communications you receive electronically, will only be after you have proactively provided clear, unambiguous, specific and informed consent, in line with GDPR Article 4(11). Consent may be provided verbally or via a proactive electronic online tick box, ticked by the customer. We will ask your consent to receiving marketing information before you enter into your Panda customer service agreement. As a data subject it is your right to withdraw your consent to marketing at any time during the delivery service.

SERVICE INFORMATION

Periodically, we may need to contact you about significant changes to our delivery services. This may include changes or amendments to contract. It may also include unexpected service delays, contamination reporting, changes to services caused by weather events and or pricing changes. So that we may deliver our services efficiently to you, this right to contact you about



Service Information is a term and condition of our service and separate to marketing consent. Please ensure to select your preferred method of contact on our forms and contact us to update your Service Information preferences, where they change.

Preferential contact details to receive Service Information may be provided verbally over the phone or via electronic tick box on our website.

MARKETING OPT OUT

We respect your privacy and where you opted into marketing, you may withdraw your consent at any time. You can ask us to stop sending you marketing messages at any time by contacting our customer services team (details below).

Your details will be placed on a Do Not Contact (DNC) list immediately thereafter and you won't be contacted again in relation to marketing. All marketing emails have an unsubscribe link that can be utilised at the footer of the message, in which case you will not receive any more of these communications from our marketing team.

COOKIES

Some website cookies are **strictly necessary** and essential for operation. Strictly necessary cookies are classified as cookies that must be present for the website to provide the basic functions of the website, such as user sign in and registration, for example. These types of cookies **do not** require individual user consent as they are essential for the basic functionality of the website and do not capture personal data of the user.

In terms of "**performance**" cookies (monitoring the performance of the website), we provide a granular consent banner breakdown when you visit our site. This allows you to proactively consent to the specific types of performance cookies that are deployed on our website. For more detailed information on our privacy standards around the use of website cookies, please visit our cookies policy. We provide a granular breakdown of consent options for every user that visits our site. Performance cookies will only be deployed where you have consented to their use.

CHANGE OF PURPOSE

We will only use your personal data for the specific purpose(s) 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact the Panda Privacy Officer (details below). Your privacy rights are very important to Panda, and we urge you to make contact should you have any privacy related concerns or queries.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by changes in the law.

THIRD- PARTY DATA SHARING

We may have to share your personal data with the parties set out below for the purposes set out on Page 6 (above). This data sharing will be strictly limited to relevant and necessary third parties who help us achieve the purpose of the processing in each case. Each third-party relationship is governed strictly in accordance with Irish and European data protection laws and in line with a data protection specific contract.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions governed by contract.

INTERNATIONAL DATA TRANSFERS

In certain limited circumstances, we may transfer your personal information internationally, including outside of the European Economic Area (EEA).

Where we use providers based in the US or other “third countries” outside of the EEA, we will only do so in accordance with GDPR and local law. Panda ensures service providers outside the EEA subscribe to Standard Contract Clauses approved by the European Commission. We conduct very thorough Transfer Impact Assessments (TIAs) when considering the potential impact of retaining Data Processors based in countries outside of the EEA.

Where we assess that such Chapter V safeguards are not necessary, this is because several countries have been deemed to provide an adequate level of protection for personal data by the European Commission.

Please contact our Privacy Officer (details below and Page 2) if you want further information on the specific data transfer mechanism used by Panda where transferring your personal data to entities based outside of the EEA.

INFORMATION AND SECURITY

Appropriate technical and organisational security measures are implemented at Panda to prevent your personal data from being compromised. We adhere to ISO27001 IT standards and require our third parties to conform to respective information security standards.

Access to your personal data within the group is managed by information security approvals which restricted authorised access. to those employees, agents, contractors and other third parties who are strictly relevant to the purpose of the processing.



All third- party processor relationships are governed by a data protection specific contract, outlining the conditions of processing your personal data (in line with Article 28 GDPR.) Third- party processors will only process your personal data on Panda instructions as a Data Controller, and they are subject to a duty of confidentiality as part of their Data Processor contractual obligations.

The data you provide will be transmitted via SSL encryption (Secure Sockets Layer) which is security technology for establishing an encrypted link between a web server and a browser. This link ensures that all data passed between the web server and browsers remain private and integral. SSL is an industry-standard and is used by millions of websites in the protection of their online transactions with their customers.

In some cases (for example signing up for a service) the data you provide will be transmitted via above mentioned SSL encryption and API (Application Programming Interface) which allows our website to communicate with our CRM system (Customer Relationship Management) for account management. The Cloud based CRMs used to store Panda customer data are Paw, Dataset and Eremos (in respect of commercial waste).

Information is kept in a database on our server provided by our hosting third-party partners, who have taken all necessary measures themselves to ensure high standards of data security practice in line with GDPR standards. This compliance is continually monitored by Panda's Privacy Officer and subject to IT audit.

Authorised Panda staff have access to the personal data you have provided us with. Panda staff members receive appropriate GDPR training in the correct handling of this data.

Staff members have unique usernames and passwords to access personal data. The access codes provided to our staff are complex and updated on a regular basis. We also keep automated log-in records.

Website security: We have implemented robust security tools to protect our website from potential threats such as malware attacks, DDoS attacks, hacking, amongst others. Staff are regularly trained on the dangers posed by phishing attacks.

Under General Data Protection Regulation (EU) 2016/679 if the personal data that you store about you has been compromised in any form, we will report the breach to the Data Protection Commission (via Group Privacy Officer Officer) within 72 hours, in line with specified timescales in Article 33 GDPR.

We have procedures in place to detect, report and investigate a personal data breach and will comply with these and review them on a regular basis. If a data breach is likely to bring harm to you the 'individual' (such as identity theft or breach of confidentiality) you will also be notified without undue delay. Overall, hopefully this outlines how your data will be robustly secured, via a range of technical security measures and working procedures at Panda.



Panda applies GDPR data minimisation principles and maintains a data destruction schedule where purging of data that is beyond the assigned retention period.

YOUR INDIVIDUAL PRIVACY RIGHTS

Under Data Protection law, you have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. The time limit for Panda to respond in full to these requests is usually one month.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data which enables you to ask us to delete or remove personal data. We may not however be able to respond to your action. If we cannot for legal reasons, we will inform you of this at the time. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however that we may refuse to comply with your request of erasure for specific legal reasons which will be notified to you at the time of your request.

Object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. (As with all Chapter III GDOR individual rights, these rights are not absolute and other competing privacy rights and responsibilities of Panda (as Data Controller), will be considered.)

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Right to Rectification- You are entitled to obtain from Panda, without undue delay, the rectification of inaccurate personal data concerning you. This will correct any inaccuracies you may feel we have about your data on record/file.

These rights are not absolute but may be subject to legal privilege, commercial sensitivity and redactions.

If you wish to avail of any of these rights, you should submit a written request to the Privacy Officer address listed on page 2 of this privacy statement. Other modes of communication are:

Contact Number: 01 8298989

Email: Privacy.Officer@pandagreen.ie

NO FEE USUALLY REQUIRED

In line with GDPR individual rights enshrined in Chapter III, you will not have to pay a fee to access a copy of your personal data (or to exercise any of the other Chapter III individual rights). However, we may in some limited circumstances charge a reasonable administrative fee if your request is clearly unfounded, repetitive, or excessive.

WHAT WE MAY NEED FROM YOU

In line with Recital 64 GDPR (Identity verification), as Data Controller we may need to take reasonable measures to verify your identity. This is usually achieved by requesting a copy of your driving licence or passport for example, to verify identity before actioning your request. 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.