

## **Ecologia Environmental Solutions Ltd. Privacy Policy**

### **Your privacy is important to us**

This privacy policy sets out how we collect and process your personal data when you visit our website and when you interact with us through any other ways, such as enquiring about and/or contracting with us for any of our services, subscribing to our publications or attending any of our events. It also tells you about your privacy rights and how the law protects you.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Our website(s) and services are not intended for children, and we do not knowingly collect data relating to children.

### **Who we are**

In this Privacy Policy, “we”, “us” and “our” refer to **Ecologia Environmental Solutions Ltd**, registered office at Spring Lodge, 172 Chester Road, Helsby, Cheshire, WA6 0AR.

For the purpose of UK data protection laws, we are the data controller and process and store information collected on our website(s), when you contact us to enquire about and/or contract with us for any of our services and/or when we reach out to you for marketing purposes.

We are a subsidiary company within the RSK Group, the ultimate parent company of which is RSK Group Limited. The RSK Group which is made up of different legal entities, details of which can be found on our Legal Structure available on [www.rskgroup.com](http://www.rskgroup.com). Where another RSK Group company collects personal data from you, their privacy policy shall apply.

Our contact details for any questions about this privacy policy can be found at the end of this privacy policy.

### **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links in our website**

Our website may include links to third-party websites (which include other RSK Group company 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. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### **The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of services you have purchased from us.
- Profile Data includes service engagements made by you, feedback and survey responses.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties (including other companies in the RSK Group) and your communication preferences.

We do not collect, use and share Aggregated Data such as statistical or demographic data for any purpose.

We do not collect any Special Categories of Personal Data about you (this 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). 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 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.

#### **How is your personal data collected?**

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

- When we communicate with you by email or other electronic correspondence, by telephone, by post or using video conferencing software or otherwise, you may give us your Identity, Contact and Financial Data. This includes personal data you provide when you:
  - enquire about and/or contract with us and during the performance for our services to you.
  - subscribe to our publications.
  - create an account on our website (if applicable).
  - request marketing to be sent to you.
  - participate in an event, including webinars.
  - complete a survey; or
  - give us feedback or contact us.
- Networking (for example, at in-person or virtual events).
- Through your use our guest Wi-Fi service (if applicable).
- Through automated technologies or interactions. As you interact with our website, we will 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. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.

- By virtue of our access to CCTV footage at our premises.
- From third parties or publicly available sources such as:
  - Other companies in the RSK Group.
  - Companies House.
  - the Electoral Register.
  - credit check agencies.
  - providers of technical, payment and delivery services.

### How we use your personal data

We may 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 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 obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending 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.

### Purposes for which we will use your personal data

We have set out below 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 us 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 including basis of legitimate interest
To check whether we can act for you as a new or existing client or across from you as a counter party or other third party on a matter involving a new or existing client, and carry out all of our regulatory compliance requirements, including conflicts of interest, sanctions, fraud and background screening register you as a new client	(a) Identity (b) Contact	Performance of a contract with you
To perform and deliver a service to you including managing payments, fees and	(a) Identity (b) Contact	(a) Performance of a contract with you

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
charges and collecting and recovering money owed to us	(c) Financial (d) Transaction (e) Marketing and Communications	(b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy and asking you for feedback or to taking 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 clients use our 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
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
		business and to inform our marketing strategy)
To make suggestions and recommendations to you about services and events that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our services and grow our business)

### Marketing

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

We 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 services, publications and/or events may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us, purchased services from us or attended one of our events and you have not opted out of receiving that marketing.

We will get your consent before we share your personal data with any third party (including other companies in the RSK Group) for marketing purposes.

### Opting out

You can ask us to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service provision.

### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please review our cookie policy.

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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 law.

### **Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the table above:

- Other companies in the RSK Group;
- Service providers acting as processors who provide IT, finance, marketing and system administration services.
- Professional advisers to our business including lawyers, bankers, auditors and insurers. HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

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.

### **International transfers**

We do not transfer your personal data outside the UK. OR

Where we share your personal data within the RSK Group or with third party service providers, it may involve transferring your data outside the UK.

If we transfer your personal data out of the UK, 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.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

### **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.

### **Data retention. How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we

collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for six years after they cease being clients for tax purposes.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

### **Your legal rights**

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please use the contact details set out at the end of this privacy policy.

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 could refuse to comply with your request in these circumstances.

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.

We try to respond to all legitimate requests within one month. Occasionally it could 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.

### **Contact details**

If you have any questions about this privacy policy or our privacy practices, please use the following contact details:

Contact: Data Protection Officer (DPO)

Email: [admin@ecologia-environmental.com](mailto:admin@ecologia-environmental.com)

Address: Ecologia Environmental Solutions Ltd, Spring Lodge, 172 Chester Road, Helsby, Cheshire, WA6 0AR.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues [www.ico.org.uk](http://www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### **Privacy policy update**

This privacy policy was last updated on 8<sup>th</sup> November 2022. We may change this privacy policy from time to time without notice and updated versions will be published on our website.