



**PriorityWaste**<sup>®</sup>

*Your waste is our priority*

## PRIVACY POLICY

Priority Waste Limited  
Also trading as  
Priority Haz<sup>®</sup>  
Priority WEEE<sup>®</sup>

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### **Document Owner**

Priority Waste Limited  
Approved By  
Managing Director

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Priority Waste Limited  
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Company Registration Number: 06181137  
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## Document Control Notice

This document is a controlled document.

The electronic version published by Priority Waste Limited is the current approved version.

Printed copies are considered **uncontrolled** unless otherwise authorised by the Company.

## REVISION HISTORY

Version	Date	Author	Summary of Changes	Approved By
1.0	27 June 2026	Priority Waste Limited	Initial issue of the Privacy Policy.	Managing Director
2.0	27 June 2026	Priority Waste Limited	Comprehensive review and redevelopment. Document restructured to align with the Company's legal document standards. Updated to reflect current UK data protection legislation, business operations, Website, Customer Portal, information security controls, cookies, data retention, privacy rights and governance arrangements.	Managing Director

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## 1. INTRODUCTION

### 1.1 Welcome

Welcome to the Privacy Policy of **Priority Waste Limited** ("the Company"), trading as **Priority Haz®** and **Priority WEEE®**.

Priority Waste Limited is committed to protecting and respecting your privacy. We recognise the importance of safeguarding Personal Data and are committed to processing it lawfully, fairly, transparently and securely.

This Privacy Policy explains how we collect, use, store, protect, disclose and otherwise process Personal Data when you interact with us, whether through our Websites, Customer Portal, Online Services, by telephone, email, social media, in person or through any other business interaction.

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### 1.2 Purpose of this Privacy Policy

The purpose of this Privacy Policy is to explain:

- what Personal Data we collect;
- why we collect it;

- how we use it;
- who we may share it with;
- how long we retain it;
- how we protect it; and
- the rights available to you.

We are committed to being open, transparent and accountable in the way we handle Personal Data.

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### **1.3 Who this Privacy Policy Applies To**

This Privacy Policy applies to individuals who interact with the Company, including:

- Customers;
  - prospective Customers;
  - Customer Portal Users;
  - Website visitors;
  - Suppliers;
  - Contractors;
  - business contacts;
  - job applicants;
  - employees and representatives of our Customers or Suppliers; and
  - any other individual whose Personal Data we process in connection with our business activities.
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### **1.4 Data Controller**

For the purposes of this Privacy Policy, **Priority Waste Limited** is the Data Controller responsible for determining how and why Personal Data is processed.

Priority Waste Limited trades as:

- **Priority Haz**<sup>®</sup>
- **Priority WEEE**<sup>®</sup>

**Company Registration Number: 06181137**

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### **1.5 Our Commitment to Privacy**

The Company is committed to maintaining appropriate organisational and technical measures to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or unauthorised access.

We continually review and improve our information management, cyber security, business continuity and operational processes to support the ongoing protection of Personal Data and compliance with Applicable Data Protection Legislation.

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### **1.6 Changes to this Privacy Policy**

This Privacy Policy may be amended from time to time to reflect changes in legislation, regulatory guidance, technology or our business operations.

The latest version will always be published on our Website and will replace all previous versions.

We encourage Users to review this Privacy Policy periodically to remain informed about how we protect Personal Data.

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### **1.7 Our Privacy Promise**

We believe privacy should be straightforward.

Accordingly, we are committed to the following principles:

- We only collect the Personal Data we genuinely need.
- We only use Personal Data where we have a lawful basis to do so.
- We keep Personal Data secure using appropriate technical and organisational measures.
- We only share Personal Data where it is necessary, lawful or authorised.
- We retain Personal Data only for as long as it is reasonably required.
- **We never sell your Personal Data.**

Our aim is to handle your Personal Data with the same care, professionalism and respect that we expect for our own information.

## 2. DEFINITIONS

For the purposes of this Privacy Policy, the following defined terms shall have the meanings set out below. Unless the context requires otherwise, these definitions apply throughout this Privacy Policy.

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### A. CORPORATE DEFINITIONS

Defined Term	Definition
<b>Company</b>	<b>Priority Waste Limited</b> , Company Registration Number <b>06181137</b> , trading as <b>Priority Haz®</b> and <b>Priority WEEE®</b> . References throughout this Privacy Policy to " <b>we</b> ", " <b>our</b> " and " <b>us</b> " mean Priority Waste Limited.
<b>Customer Portal</b>	The secure online portal operated by the Company through which authorised Users access quotations, documentation, certificates, invoices, account information and other Online Services.
<b>Online Services</b>	Any digital products, services, facilities or functionality made available by the Company through the Website or Customer Portal.
<b>User</b>	Any individual accessing or using the Website, Customer Portal or Online Services.
<b>Website</b>	Any website owned or operated by the Company, including websites operated under the registered trading names <b>Priority Haz®</b> and <b>Priority WEEE®</b> .

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### B. DATA PROTECTION DEFINITIONS

Defined Term	Definition
<b>Applicable Data Protection Legislation</b>	All legislation, regulations and statutory guidance relating to the protection of Personal Data applicable within the United Kingdom, including the UK GDPR, the Data Protection Act 2018, PECR and any amendment, replacement or successor legislation.
<b>Consent</b>	Any freely given, specific, informed and unambiguous indication by which a Data Subject agrees to the Processing of Personal Data where Consent is relied upon as the lawful basis for Processing.
<b>Data Controller</b>	The organisation that determines the purposes and means of Processing Personal Data. Unless stated otherwise, the Company is the Data Controller.
<b>Data Processor</b>	Any person or organisation Processing Personal Data on behalf of the Data Controller.
<b>Data Subject</b>	An identified or identifiable living individual to whom Personal Data relates.
<b>Personal Data</b>	Any information relating to an identified or identifiable living individual as defined by Applicable Data Protection Legislation.
<b>Personal Data Breach</b>	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data.

<b>Defined Term</b>	<b>Definition</b>
<b>Processing</b>	Any operation performed on Personal Data, whether automated or manual, including collection, storage, use, disclosure, transmission, restriction, erasure or destruction.
<b>Recipient</b>	Any natural or legal person, public authority, agency or other body to whom Personal Data is disclosed.
<b>Special Category Data</b>	Personal Data requiring additional protection under Applicable Data Protection Legislation.
<b>Third Party</b>	Any person or organisation other than the Data Subject, the Company or persons authorised to Process Personal Data on the Company's behalf.

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### C. DIGITAL DEFINITIONS

<b>Defined Term</b>	<b>Definition</b>
<b>Cookies</b>	Small text files or similar technologies used to support the operation, functionality, performance and security of the Website, Customer Portal or Online Services.
<b>Device</b>	Any computer, smartphone, tablet or other electronic device used to access the Website, Customer Portal or Online Services.
<b>Regulatory Authority</b>	Any governmental or statutory body responsible for regulating the Company's Processing of Personal Data, including the Information Commissioner's Office (ICO) or any successor body.

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### D. INTERPRETATION

Unless the context requires otherwise:

- words importing the singular include the plural and vice versa;
- references to one gender include all genders;
- references to legislation include any amendment, replacement or re-enactment;
- headings are for convenience only and do not affect interpretation;
- defined terms have the same meaning throughout this Privacy Policy unless expressly stated otherwise.

## 3. INFORMATION WE COLLECT

The Personal Data we collect depends upon how you interact with the Company, the Services you request and the information you choose to provide.

We will only collect Personal Data that is relevant, adequate and limited to what is reasonably necessary for the purposes described within this Privacy Policy.

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## A. INFORMATION YOU PROVIDE TO US

We may collect Personal Data that you provide directly to us, including:

<b>Category</b>	<b>Examples</b>
<b>Identity Information</b>	Name, job title, employer, business role and other identifying information.
<b>Contact Information</b>	Postal address, email address, telephone number and other contact details.
<b>Account Information</b>	Customer Portal registration details, usernames, authentication information and account preferences.
<b>Enquiry Information</b>	Information submitted through quotation requests, contact forms, emails, telephone calls, online enquiries or other communications.
<b>Contract Information</b>	Purchase orders, service requests, contracts, collection details and instructions relating to the Services we provide.
<b>Payment &amp; Billing Information</b>	Billing addresses, invoicing details and payment information necessary to administer our Services.
<b>Supporting Documents</b>	Safety Data Sheets (SDS), waste inventories, photographs, site surveys, transport documentation, certificates and other documents submitted in connection with enquiries or Services. Such documents may contain Personal Data where relevant to the Services requested.

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## B. INFORMATION WE COLLECT AUTOMATICALLY

When you use our Website or Customer Portal, we may automatically collect certain technical information, including:

<b>Category</b>	<b>Examples</b>
<b>Technical Information</b>	IP address, browser type, operating system, device type, language settings and connection information.
<b>Usage Information</b>	Pages visited, links selected, Customer Portal activity, Website usage statistics and interaction with Online Services.
<b>Security Information</b>	Login activity, authentication records, failed login attempts, Multi-Factor Authentication events and other information used to protect our systems.
<b>Cookie Information</b>	Information collected through Cookies and similar technologies as described within our Cookie Policy.

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## C. INFORMATION RECEIVED FROM THIRD PARTIES

We may receive Personal Data from Third Parties where it is lawful and appropriate to do so, including:

- Customers acting on behalf of their employees or representatives;
- Suppliers and subcontractors;
- Regulatory Authorities;

- professional advisers;
  - payment service providers;
  - publicly available sources; and
  - other organisations where you have authorised the sharing of your information.
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#### **D. TELEPHONE COMMUNICATIONS**

Where telephone calls are recorded for training, quality assurance, security, regulatory compliance or evidential purposes, the Company may collect and retain recordings in accordance with Applicable Data Protection Legislation.

Where call recording is in operation, appropriate notification will be provided where required.

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#### **E. CCTV**

Where CCTV operates at Company premises, images may be recorded for the purposes of safety, security, crime prevention, incident investigation, protection of Company assets and compliance with legal obligations.

CCTV recordings are managed in accordance with Applicable Data Protection Legislation and are retained only for as long as reasonably necessary.

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#### **F. SPECIAL CATEGORY DATA**

The Company does not routinely collect or request Special Category Data.

Where it becomes necessary to process Special Category Data, we will only do so where there is a lawful basis under Applicable Data Protection Legislation and appropriate safeguards are in place.

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#### **G. CHILDREN'S DATA**

The Company's Website, Customer Portal and Services are intended primarily for business users and are not directed at children.

The Company does not knowingly collect Personal Data relating to children unless required in connection with a lawful business activity or legal obligation.

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## H. ACCURACY OF INFORMATION

You are responsible for ensuring that the Personal Data you provide to the Company is accurate, complete and kept up to date.

Please notify the Company promptly if your Personal Data changes so that our records remain accurate and current.

## 4. HOW AND WHY WE USE YOUR PERSONAL DATA

The Company only Processes Personal Data where there is a legitimate business purpose, contractual requirement, legal obligation or other lawful basis for doing so.

We use Personal Data to operate our business efficiently, provide our Services, protect our Customers, Suppliers and employees, comply with legal obligations and continually improve our operations.

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### A. HOW WE USE YOUR PERSONAL DATA

<b>Purpose</b>	<b>Examples</b>
<b>Providing our Services</b>	Preparing quotations, arranging collections, delivering contracted Services, issuing documentation and providing Customer support.
<b>Customer Account Management</b>	Creating and administering Customer Portal accounts, managing customer records and responding to enquiries.
<b>Contract Administration</b>	Managing contracts, purchase orders, collections, deliveries, invoices, certificates and other contractual obligations.
<b>Customer Communications</b>	Responding to enquiries, providing updates, sending service notifications and communicating about existing or requested Services.
<b>Environmental &amp; Waste Compliance</b>	Meeting legal obligations relating to waste management, hazardous waste compliance, Duty of Care documentation, consignment notes, waste tracking, environmental reporting, audit records and regulatory requirements.
<b>Health, Safety &amp; Security</b>	Protecting our employees, Customers, Suppliers, premises, Website, Customer Portal and business operations, including cyber security and incident management.
<b>Fraud Prevention &amp; Business Protection</b>	Verifying identities, preventing fraud, detecting unauthorised access, protecting Customer Portal accounts, safeguarding Company assets and protecting our legitimate business interests.
<b>Payment &amp; Credit Control</b>	Raising invoices, processing payments, managing customer accounts, carrying out credit control activities and recovering outstanding debts where necessary.
<b>Business Improvement</b>	Analysing customer feedback, monitoring service quality, improving operational efficiency, developing new digital services, enhancing the Website and Customer Portal, and continually improving our business processes.

<b>Purpose</b>	<b>Examples</b>
<b>Recruitment</b>	Assessing applications, communicating with applicants and managing recruitment activities.
<b>Legal Claims &amp; Dispute Resolution</b>	Establishing, exercising or defending legal claims and protecting the Company's legal rights and interests.

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## **B. BUSINESS COMMUNICATIONS**

The Company may use your contact details to communicate with you regarding:

- quotations;
- existing or requested Services;
- collection arrangements;
- Customer Portal notifications;
- invoices and payment matters;
- regulatory or compliance updates relevant to the Services we provide;
- customer satisfaction and service improvements; and
- other communications reasonably connected with our business relationship.

We will not send unsolicited electronic marketing communications where your consent is required unless that consent has been obtained.

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## **C. MARKETING**

Where permitted by Applicable Data Protection Legislation, the Company may send information about Services that we believe may be relevant to your business.

Where your consent is required, we will obtain it before sending marketing communications.

You may withdraw your consent or opt out of marketing communications at any time by using the unsubscribe facility provided or by contacting the Company directly.

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## **D. AUTOMATED DECISION-MAKING**

The Company does not routinely make decisions based solely on automated Processing or profiling that produce legal or similarly significant effects on individuals.

Should this change, the Company will update this Privacy Policy and comply with Applicable Data Protection Legislation.

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## **E. OUR COMMITMENT**

We will only use Personal Data for the purposes for which it was collected or for another compatible purpose permitted by Applicable Data Protection Legislation.

Where we intend to use Personal Data for a materially different purpose, we will take appropriate steps to inform affected individuals where required by law.

## 5. OUR LAWFUL BASIS FOR PROCESSING PERSONAL DATA

The Company will only Process Personal Data where there is a lawful basis for doing so under Applicable Data Protection Legislation.

The lawful basis we rely upon depends upon the nature of our relationship with you and the purpose for which your Personal Data is Processed.

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### A. OUR LAWFUL BASES

<b>Business Activity</b>	<b>Lawful Basis</b>	<b>Why We Process Your Personal Data</b>
<b>Preparing quotations</b>	Contract / Pre-contractual Steps	To prepare quotations, respond to enquiries and take steps before entering into a contract.
<b>Providing Services</b>	Contract	To deliver the Services requested and fulfil our contractual obligations.
<b>Customer account management</b>	Contract / Legitimate Interests	To administer Customer accounts and provide secure access to the Customer Portal.
<b>Customer support</b>	Contract / Legitimate Interests	To respond to enquiries, resolve issues and provide ongoing customer support.
<b>Billing and payment processing</b>	Contract / Legal Obligation	To issue invoices, process payments, maintain financial records and administer customer accounts.
<b>Environmental and waste compliance</b>	Legal Obligation	To comply with environmental legislation, Duty of Care requirements, hazardous waste legislation, waste transfer documentation, hazardous waste consignment records, statutory record-keeping, audit requirements and other applicable regulatory obligations.
<b>Fraud prevention and cyber security</b>	Legitimate Interests	To protect our Customers, Website, Customer Portal, employees, Suppliers and business operations from fraud, cyber threats and unauthorised activity.
<b>Website and Customer Portal security</b>	Legitimate Interests	To maintain the security, integrity, resilience and availability of our digital services.
<b>Business improvement</b>	Legitimate Interests	To analyse customer feedback, improve our Services, Website, Customer Portal, operational performance and internal business processes.

<b>Business Activity</b>	<b>Lawful Basis</b>	<b>Why We Process Your Personal Data</b>
<b>Recruitment</b>	Legitimate Interests / Pre-contractual Steps	To assess applications, communicate with applicants and manage recruitment activities.
<b>Marketing</b>	Consent or Legitimate Interests (where permitted by Applicable Data Protection Legislation)	To provide information about Services that may be relevant to you where we are legally permitted to do so.
<b>Legal and regulatory matters</b>	Legal Obligation / Legitimate Interests	To comply with legal obligations, establish, exercise or defend legal claims and cooperate with Regulatory Authorities where required.

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## **B. CONSENT**

Where the Company relies upon your Consent to Process Personal Data, you may withdraw that Consent at any time.

Withdrawal of Consent will not affect the lawfulness of any Processing carried out before Consent was withdrawn.

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## **C. LEGITIMATE INTERESTS**

Where the Company relies upon Legitimate Interests as its lawful basis, we carefully balance our legitimate business interests against your rights and freedoms.

We will only rely upon Legitimate Interests where we are satisfied that our Processing is fair, proportionate and does not override your fundamental rights or freedoms.

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## **D. LEGAL OBLIGATIONS**

The Company is required to Process certain Personal Data in order to comply with legal and regulatory obligations.

These obligations may include, but are not limited to:

- environmental and waste management legislation;
  - hazardous waste regulations;
  - Duty of Care requirements;
  - taxation and accounting legislation;
  - health and safety legislation;
  - fraud prevention;
  - law enforcement requests; and
  - other statutory or regulatory obligations applicable to our business.
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## E. CHANGES TO OUR LAWFUL BASIS

Where the lawful basis for Processing Personal Data changes, the Company will take appropriate steps to ensure that such Processing continues to comply with Applicable Data Protection Legislation.

Where required by law, we will notify affected individuals and, where appropriate, obtain further Consent before undertaking any materially different Processing activity.

## 6. SHARING YOUR PERSONAL DATA

The Company treats Personal Data as confidential and will only share it where it is necessary, lawful and proportionate to do so.

**We do not sell, rent or trade Personal Data to third parties for marketing or commercial purposes.**

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### A. WHO WE MAY SHARE PERSONAL DATA WITH

Where necessary, the Company may share Personal Data with the following categories of recipients:

<b>Recipient</b>	<b>Purpose</b>
<b>Waste treatment and disposal facilities</b>	To arrange, deliver and evidence the lawful treatment, recovery or disposal of waste.
<b>Transport providers and subcontractors</b>	To collect, transport and deliver waste or provide contracted Services on our behalf.
<b>Waste documentation providers</b>	To produce, administer or manage statutory waste documentation, including Waste Transfer Notes, Hazardous Waste Consignment Notes, Certificates of Destruction, recycling certificates, audit reports and other compliance documentation where required.
<b>IT service providers</b>	To support the secure operation of our Website, Customer Portal, cloud services, communications and business systems.
<b>Professional advisers</b>	Including solicitors, accountants, auditors, insurers and other professional advisers where necessary.
<b>Banks and payment service providers</b>	To process payments, administer financial transactions, manage refunds and support credit control activities.
<b>Regulatory Authorities and public bodies</b>	Where disclosure is required by law or is necessary to comply with legal or regulatory obligations.
<b>Law enforcement agencies</b>	Where disclosure is required or permitted by Applicable Law.

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## **B. SERVICE PROVIDERS**

Where the Company appoints third-party service providers to Process Personal Data on its behalf, appropriate contractual, organisational and technical measures will be implemented to ensure that Personal Data is protected in accordance with Applicable Data Protection Legislation.

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## **C. LEGAL DISCLOSURES**

The Company may disclose Personal Data where it is necessary to:

- comply with Applicable Law;
  - comply with a court order or lawful request;
  - meet regulatory obligations;
  - establish, exercise or defend legal claims;
  - prevent, detect or investigate suspected fraud or criminal activity; or
  - protect the rights, property, safety or legitimate interests of the Company, its Customers, Suppliers, employees or members of the public.
- 

## **D. BUSINESS CHANGES**

If the Company undergoes a merger, acquisition, restructuring, transfer or sale of all or part of its business, Personal Data may be transferred as part of that transaction where permitted by Applicable Data Protection Legislation.

Appropriate safeguards will be implemented to protect Personal Data throughout the process.

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## **E. OUR COMMITMENT**

The Company only shares the minimum Personal Data reasonably necessary for the relevant purpose.

Where reasonably practicable, we ensure that organisations receiving Personal Data are subject to appropriate confidentiality, security and data protection obligations.

The Company remains committed to handling Personal Data responsibly and will only disclose information where there is a lawful basis and a genuine business or legal need to do so.

## **7. INTERNATIONAL TRANSFERS OF PERSONAL DATA**

The Company primarily Processes and stores Personal Data within the United Kingdom.

Where it is necessary to transfer Personal Data outside the United Kingdom, the Company will ensure that appropriate safeguards are in place to protect that information in accordance with Applicable Data Protection Legislation.

Such safeguards may include:

- transfers to countries recognised as providing an adequate level of protection for Personal Data;
- the use of approved contractual safeguards;
- transfers permitted under Applicable Data Protection Legislation; or
- other lawful transfer mechanisms recognised under Applicable Data Protection Legislation.

The Company will only transfer Personal Data internationally where there is a genuine business, operational or legal requirement to do so.

Some of the Company's IT service providers may utilise secure cloud infrastructure or data centres located outside the United Kingdom. Where this occurs, the Company will ensure that appropriate legal, contractual and technical safeguards are in place before any Personal Data is transferred.

The Company regularly reviews its third-party service providers to help ensure that any international transfers of Personal Data continue to comply with Applicable Data Protection Legislation and remain appropriate for the Services being provided.

Where appropriate, further information regarding international transfers and the safeguards applied may be requested by contacting the Company using the contact details published on the Website.

## **8. DATA RETENTION**

The Company will retain Personal Data only for as long as it is reasonably necessary to fulfil the purposes for which it was collected, including the provision of our Services, compliance with legal and regulatory obligations, the resolution of disputes and the establishment, exercise or defence of legal claims.

Retention periods are determined by taking into account:

- the nature of the Personal Data;
- the purpose for which it was collected;
- contractual requirements;
- statutory and regulatory obligations;
- business and operational requirements; and
- the need to protect the Company's legal rights and legitimate interests.

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### **A. RETENTION OF PERSONAL DATA**

Personal Data may be retained where necessary for purposes including:

<b>Purpose</b>	<b>Examples</b>
<b>Provision of Services</b>	Customer records, quotations, contracts, collection information and service history.
<b>Environmental &amp; Waste Compliance</b>	Waste Transfer Notes, Hazardous Waste Consignment Notes, Certificates of Destruction, recycling certificates, Duty of Care documentation and other statutory waste records.
<b>Financial &amp; Accounting Records</b>	Invoices, payment records, credit control records and financial documentation required by law.
<b>Health, Safety &amp; Security</b>	Incident reports, CCTV recordings (where applicable), security logs and investigation records.
<b>Legal &amp; Regulatory Compliance</b>	Records required to demonstrate compliance with Applicable Law or Regulatory Authority requirements.

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## **B. RECORD RETENTION SCHEDULE**

The Company maintains an internal **Record Retention and Disposal Schedule** to support the consistent, secure and compliant management of Personal Data across the business.

This internal schedule is reviewed periodically and updated where necessary to reflect changes in legislation, regulatory requirements, operational needs and business practices.

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## **C. SECURE DELETION**

When Personal Data is no longer required, it will be securely deleted, destroyed, anonymised or otherwise disposed of using methods appropriate to the nature of the information and the level of risk.

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## **D. BACKUPS**

Where Personal Data forms part of secure system backups, it may remain within those backups until they are securely overwritten or reach the end of their normal retention cycle.

During this period, the information will continue to be protected by appropriate technical and organisational security measures.

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## **E. LITIGATION, INVESTIGATIONS AND LEGAL HOLDS**

Where Personal Data is relevant to an actual or anticipated legal claim, regulatory investigation, audit, insurance matter or law enforcement request, the Company may retain that information for longer than its standard retention period where permitted or required by Applicable Data Protection Legislation.

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## F. RETENTION REVIEW

The Company regularly reviews the Personal Data it holds to ensure that information is not retained for longer than is reasonably necessary.

Retention periods may be amended from time to time to reflect changes in legislation, regulatory guidance, operational requirements or business needs.

## 9. YOUR PRIVACY RIGHTS

Applicable Data Protection Legislation provides individuals with a number of rights relating to their Personal Data.

These rights are not absolute and may be subject to certain legal conditions, exemptions or limitations.

The Company is committed to respecting your rights and will respond to valid requests in accordance with Applicable Data Protection Legislation.

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### A. YOUR RIGHTS

You may have the right to:

<b>Right</b>	<b>What this means</b>
<b>Right of Access</b>	Request a copy of the Personal Data we hold about you.
<b>Right to Rectification</b>	Request that inaccurate or incomplete Personal Data is corrected.
<b>Right to Erasure</b>	Request the deletion of Personal Data where there is no lawful reason for us to continue Processing it.
<b>Right to Restrict Processing</b>	Request that we temporarily limit the way we Process your Personal Data in certain circumstances.
<b>Right to Data Portability</b>	Request that certain Personal Data is provided to you or another organisation in a structured, commonly used and machine-readable format where applicable.
<b>Right to Object</b>	Object to certain types of Processing, including Processing based on Legitimate Interests or direct marketing.
<b>Right to Withdraw Consent</b>	Withdraw your Consent at any time where Consent is the lawful basis for Processing.
<b>Rights relating to Automated Decision-Making</b>	Request human intervention where applicable where decisions are made solely by automated Processing and produce legal or similarly significant effects.

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## **B. EXERCISING YOUR RIGHTS**

If you wish to exercise any of your privacy rights, please contact the Company using the contact details published on our Website.

To protect your Personal Data, the Company may request reasonable evidence of your identity before responding to your request. This helps ensure that Personal Data is only disclosed to the correct individual or their authorised representative.

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## **C. RESPONSE TIMES**

The Company will acknowledge and respond to valid requests within the timescales required by Applicable Data Protection Legislation.

Where a request is particularly complex or involves multiple requests, we may extend the response period where permitted by Applicable Data Protection Legislation. If this applies, we will notify you and explain the reason for the extension.

The Company will not normally charge a fee for responding to a valid request. However, where permitted by Applicable Data Protection Legislation, we may charge a reasonable fee or decline to act on a request that is manifestly unfounded, excessive or repetitive.

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## **D. COMPLAINTS**

If you are dissatisfied with the way the Company has handled your Personal Data, we encourage you to contact us first so that we have the opportunity to resolve your concerns promptly and fairly.

You also have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**, or any successor body responsible for data protection within the United Kingdom.

Further information about making a complaint is available on the ICO's official website.

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## **E. OUR COMMITMENT**

The Company is committed to handling all privacy requests fairly, promptly, transparently and in accordance with Applicable Data Protection Legislation.

We will always seek to protect your privacy rights while balancing our legal, contractual and regulatory obligations.

## 10. PROTECTING YOUR PERSONAL DATA

The Company is committed to protecting Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or unauthorised access.

We implement appropriate technical and organisational measures designed to safeguard Personal Data, taking into account the nature of the information, the risks involved and current industry good practice.

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### A. OUR SECURITY MEASURES

The Company maintains a range of security measures designed to protect Personal Data, which may include:

<b>Security Measure</b>	<b>Purpose</b>
<b>Access Controls</b>	Restricting access to Personal Data to authorised individuals who require it for legitimate business purposes.
<b>Multi-Factor Authentication (MFA)</b>	Providing an additional layer of security for systems and services where appropriate.
<b>Encryption</b>	Protecting Personal Data during transmission and, where appropriate, while stored.
<b>Cyber Security Monitoring</b>	Monitoring systems for suspicious activity, unauthorised access and potential cyber threats.
<b>Secure Backups</b>	Maintaining secure backups to support business continuity and disaster recovery.
<b>Business Continuity Planning</b>	Maintaining arrangements to support the resilience and recovery of critical business systems and services.
<b>System Maintenance</b>	Applying appropriate security updates, patches and maintenance to reduce security risks where reasonably practicable.

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### B. ORGANISATIONAL MEASURES

In addition to technical safeguards, the Company maintains organisational measures that include:

- staff training and awareness;
- confidentiality obligations;
- controlled access to information;
- documented policies and procedures;
- supplier due diligence where appropriate;
- regular reviews of information security practices; and
- physical security measures to protect Company premises, equipment, systems and information.

## **C. PERSONAL DATA BREACHES**

The Company maintains procedures for identifying, investigating, managing and responding to suspected Personal Data Breaches.

Where required by Applicable Data Protection Legislation, the Company will notify the appropriate Regulatory Authority and, where necessary, affected individuals within the timescales prescribed by law.

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## **D. SHARED RESPONSIBILITY**

Whilst the Company takes appropriate steps to protect Personal Data, Users also play an important role in maintaining security.

Users should:

- keep passwords and Authentication Credentials confidential;
  - use strong, unique passwords where possible;
  - enable Multi-Factor Authentication where available;
  - notify the Company promptly if they suspect unauthorised access to their account; and
  - take reasonable steps to protect the Devices used to access the Website or Customer Portal.
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## **E. CONTINUAL IMPROVEMENT**

The Company regularly reviews and improves its technical and organisational security measures to respond to evolving cyber threats, technological developments, operational changes and regulatory requirements.

Information security forms an important part of the Company's overall governance, risk management and business continuity arrangements.

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## **F. SECURITY DISCLAIMER**

Whilst the Company implements appropriate technical and organisational measures to protect Personal Data, no method of electronic transmission, storage or processing can be guaranteed to be completely secure.

The Company continually monitors, reviews and improves its security arrangements to reduce risk, respond to emerging threats and maintain appropriate standards of information security.

## 11. COOKIES

The Company's Websites and Customer Portal use Cookies and similar technologies to support their operation, security, functionality and performance.

Cookies may also be used to:

- remember User preferences;
- improve Website performance and functionality;
- support secure access to the Customer Portal;
- analyse Website usage and visitor trends;
- improve the user experience; and
- help protect the Website and Online Services from misuse or unauthorised activity.

The Company only uses Cookies in accordance with Applicable Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR), where applicable.

Full details of the Cookies used by the Company, together with information about managing your Cookie preferences, are available within the Company's **Website Terms of Use, Acceptable Use and Cookie Policy**.

Where your consent is required before placing non-essential Cookies, the Company will seek that consent through its Cookie management tools before such Cookies are used.

Users may manage or withdraw their Cookie preferences at any time using the Cookie settings available on the Website, subject to the limitations described within the Company's Website Terms of Use, Acceptable Use and Cookie Policy.

The Company may update the Cookies used by its Websites or Customer Portal from time to time as systems, technologies and business requirements evolve.

The most up-to-date information regarding the Company's use of Cookies will always be available within the Company's **Website Terms of Use, Acceptable Use and Cookie Policy** and through the Cookie management tools available on the Website.

## 12. CHANGES TO THIS PRIVACY POLICY

The Company may review, amend or update this Privacy Policy from time to time to reflect changes in:

- Applicable Data Protection Legislation;
- regulatory guidance;
- technology;
- business operations;
- the Company's Services;
- security practices; or
- other operational or legal requirements.

The most recent version of this Privacy Policy will always be published on the Company's Website and will take effect from the stated Effective Date.

Where required by Applicable Data Protection Legislation, the Company will take appropriate steps to notify affected individuals of material changes.

Users are encouraged to review this Privacy Policy periodically to remain informed about how the Company protects Personal Data.

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## 13. CONTACTING US

If you have any questions regarding this Privacy Policy or the way in which the Company Processes Personal Data, or if you wish to exercise your privacy rights, please contact the Company using the contact details published on our Website.

The Company will deal with all privacy-related enquiries professionally, confidentially and in accordance with Applicable Data Protection Legislation.

Where appropriate, the Company may request reasonable evidence of identity before disclosing Personal Data or acting upon a request in order to protect the privacy and security of individuals.

If you remain dissatisfied after contacting the Company, you may lodge a complaint with the Information Commissioner's Office (ICO), or any successor body responsible for data protection within the United Kingdom.

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## 14. DOCUMENT INFORMATION

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