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Purpose of this policy

This policy is a statement of KWD Recycling's commitment to protect the rights and privacy of individuals in accordance with the General Data Protection Regulations.

Collecting information

We collect and use information to provide the following services:

- To undertake advertising, marketing, direct marketing and public relations exercises.
- To provide a full range of waste management activities
- To ensure the security of our premises
- To perform accounting and other record-keeping functions.
- To provide personnel, payroll and Human Resources administration and management
- For the purpose of regulatory / legislative compliance

Data Protection Principles

We shall perform our responsibilities under the GDPR in accordance with the following 7 principles:

- **Lawful, fair and transparent processing**

We have implemented a data subject consent process that demonstrates that consent has been freely given, is specific to the purpose of use and that a data subject can be informed of retention, withdrawal complaints and the purpose for holding their data. We will give a copy of his/ her personal data to that individual, on request

- **Purpose Limitation**

We shall only hold personal data to the extent that it is adequate, relevant and not excessive and we adopt procedures to ensure that data subjects can exercise their rights under the Data Protection legislation to access their data.

We shall keep personal data for purposes that are specific, lawful and clearly stated. Personal data will only be processed in a manner compatible with these purposes as defined in our Data Inventory & Asset Register.

- **Data minimisation**

We ensure that Personal data is adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.

- **Data Accuracy**

We adopt procedures that ensure high levels of data accuracy, completeness and that data is up-to-date.

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- **Storage Limitation**

Personal data will only be kept for no longer than is necessary for the purposes for which the personal data are processed.

- **Integrity and Confidentiality**

We shall use and disclose personal data only in circumstances that are necessary for the purposes for which we collected the data. We shall take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of personal data and against its accidental loss or destruction. Should there be a data breach we will report this to the Data Protection Commission within 72 hours.

- **Accountability**

The Data Protection Officer within KWD Recycling is responsible for and is able to demonstrate compliance with the principles outlined above and they have overall responsibility for compliance to our internal policies and procedures.

Procedures and Guidelines

We are firmly committed to ensuring personal privacy and compliance with the GDPR, including the provision of best practice guidelines and procedures in relation to all aspects of Data Protection.

Review

This Data Protection Policy will be reviewed regularly through our internal review process and in light of any legislative or other relevant developments.