

# Privacy Policy

## INTRODUCTION

Welcome to Ship2Shred's privacy policy.

Ship2Shred is a service provided by Shred Station Limited, a company incorporated and registered in England and Wales with company number 06359628.

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website, and also inform you about your privacy rights and how the law protects you.

Notice last updated: 19<sup>th</sup> October 2020.

## 1. IMPORTANT INFORMATION AND WHO WE ARE

### PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how Ship2Shred collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, purchase a product or service or take part in a competition.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice 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 the other notices and is not intended to override them.

### CONTROLLER

This privacy policy is adopted by Ship2Shred (referred to as "Company", "we", "us" or "our" in this privacy policy). Ship2Shred is a service provided by Shred Station Limited, a company registered in England and Wales with company number 06359628. Shred Station Limited, owner of the Ship2Shred brand, is the Data Controller and is responsible for your personal data.

When we process your personal data we are regulated under the [General Data Protection Regulation](#) which applies across the European Union (including in the United Kingdom), we are also regulated by any national laws which supplement the [General Data Protection Regulation](#) in the United Kingdom.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

### CONTACT DETAILS

Our full contact details are:

**Name:** Ship2Shred

**Address:** Osborne House, Wendover Road, Rackheath, Norwich, Norfolk. NR13 6LH.

**Email:** Please email [shred@ship2shred.co.uk](mailto:shred@ship2shred.co.uk)

**Telephone:** 0800 078 3245

### CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 19/10/2020 and historic versions can be obtained by contacting us. We may change this privacy policy from time to time. You should check this notice occasionally to ensure you are aware of the most recent version.

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

This website 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. When you leave our website, we encourage you to read the privacy policy and notices of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

The information we collect about site and service users falls into two types.

(1) Personal Data – Information that relates directly to 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, last name and title
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 products and services you have purchased from us
Technical Data	includes internet protocol (IP) address, browser type and location
Profile Data	includes purchases or orders made by you
Usage Data	includes information about how you arrive at and use our website, products and services
Marketing and Communications Data	includes your preferences in receiving marketing from us

(2) Aggregate Data – Data that does not directly identify you.

We may collect, use and share anonymous Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity.

For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not under any circumstances 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 products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## 3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

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

- Apply for our products or services;
- Request marketing to be sent to you;
- Enter a competition, promotion or survey; or
- Give us some feedback.

**Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:

- Technical Data from analytics providers such as Google Analytics, as well as our IT and technical service providers.
- Technical and Usage Data from advertising networks and search information providers.
- Contact, Financial and Transaction Data from providers of IT, technical, payment and delivery services.
- Identity and Contact Data from publicly available sources, Companies House and the Electoral Register.
- Phone numbers collected through the third party, ResponseTap Limited (company number 06613420) of 7th Floor, Building 8, Exchange Quay, Salford Quays, Manchester, M5 3EJ. ResponseTap provides Ship2Shred with phone numbers recorded when a website visitor makes a phone call to Ship2Shred during or following a visit to our website.

## 4. HOW WE USE YOUR PERSONAL DATA

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

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

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending certain direct marketing communications to you via email or post. 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, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact 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 the basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process your order and deliver the products or our services including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
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 customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	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)
To make suggestions and recommendations to you about products or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

## PROMOTIONAL OFFERS FROM US

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 products, services and offers may be relevant for you.

For individual consumers, sole traders and partnerships, you will receive marketing communications from us if you have opted-in when requesting information from us, purchased products or services from us, or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

For businesses customers and corporate bodies, you may receive marketing communications from us if you have previously requested information from us, purchased products or services from us, or if you provided us with your details when you entered a competition or registered for a promotion. Under General Data Protection Regulations, business to business promotional communications via email, text and direct mail do not require informed consent. However, your organisation can opt-out, as can individual employees within your organisation. For live calls and faxes, we will screen against the Corporate Telephone Preference Service and Fax Preference Service and offer an opt-out.

## THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any third party or company outside of Ship2Shred for marketing purposes.

## OPTING OUT

You can ask us to stop sending you marketing messages at any time by [contacting us](#) at any time, or by clicking on the unsubscribe link in any of our marketing messages. As per the General Data Protection Regulations, all requests to unsubscribe from marketing communications will be actioned within 30 days from the date of request.

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

## 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 email [shred@ship2shred.co.uk](mailto:shred@ship2shred.co.uk).

## ADVERTISING AND PERSONALISATION USING CONVERSION TRACKING PIXELS

When you use social media websites such as Facebook or Twitter, a cookie from their website is stored on your device. This cookie may still be active even once you've logged out of your social media profile. A tracking pixel is a small piece of code that is embedded into websites and connects to the cookies from social media and analytics services. Once a tracking pixel is embedded into a website's code, it can be used to show personalised ads on social media, and track conversions from these ads.

Our website uses conversion tracking and pixels for several third-party websites. We use these to monitor customer's journeys around the website and track conversions, create personalised social media adverts targeted to previous website visitors and see how you interact with these ads. These pixels **do not** enable us to view social media profile information of individual users. We use:

- Facebook Ads Conversion Tracking Pixel

This allows us to create personalised Facebook and Instagram ads and track conversions that are attributable to Facebook ads, Instagram ads, and the Facebook Audience Network service. If you do not wish to see personalised ads from Ship2Shred, you can click to hide these whenever they appear

on your Facebook and Instagram feeds. You can also change your ad preferences and withdraw consent to receive personalised advertising on Facebook by visiting the link below: [https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen)

- LinkedIn Insight Tag

This allows us to create personalised ads which will appear on your LinkedIn newsfeed, track conversions from these ads, view ad insights, and also monitor your journey through our website. The LinkedIn Insight tag is connected to your LinkedIn browser cookies. These cookies are stored in your browser until you clear your cookies, or the cookies expire. You can opt-out of cookies from LinkedIn via the [LinkedIn settings page](#). You can also read LinkedIn's cookie policy [here](#).

- Twitter's Tailored Audience Program and Conversion Tracking Program

This tracking pixel allows us to create personalised Twitter adverts targeted to previous users of our website. It also allows us to see how you interacted with these ads and monitor your journey through our website. You can change your personalisation preferences on Twitter by going into [your account settings](#).

## 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 by emailing [shred@ship2shred.co.uk](mailto:shred@ship2shred.co.uk).

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.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

Service providers who provide IT and system administration services for us.

Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

Selected subcontractors who we have vetted and have contracts in place with, and use from time to time to fulfil some of our services or for fulfilling orders of our products. However, in almost all cases we provide our services and products directly, but when we do use any subcontractors, we remain liable and responsible under the contract with you.

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.

## **6. INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the European Economic Area (EEA).

## **7. DATA SECURITY**

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

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

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

## **8. DATA RETENTION**

### **HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

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

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

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

In some circumstances, we may 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.

## **9. YOUR LEGAL RIGHTS**

Under certain circumstances, you have the following rights under the [General Data Protection Regulation](#) concerning your personal data:

- Fair processing of information and transparency over how we use your personal information;
- Access to your personal information and to certain other supplementary information that this privacy policy is already designed to address;
- Require us to correct any mistakes in your information which we hold;
- Require the erasure of personal information concerning you in certain situations;
- Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- Object at any time to processing of personal information concerning you for direct marketing;

- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- Object in certain other situations to our continued processing of your personal information; and
- Otherwise restrict our processing of your personal information in certain circumstances

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you wish to exercise any of the rights set out above, please [contact us](#).

## **NO FEE USUALLY REQUIRED**

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

## **WHAT WE MAY NEED FROM YOU**

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

## **TIME LIMIT TO RESPOND**

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

## **YOUR RIGHT TO COMPLAIN**

If you believe we have not adhered to the privacy policy as outlined above, please notify us and we will try to solve any issues you have promptly.

If you are not satisfied at our response, 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 at any time:

By web: <https://ico.org.uk/concerns/> or  
By telephone: 0303 123 1113.