



## PRIVACY STATEMENT

**NOVATI**

AT THE CENTRE OF INNOVATION

## Revision History

Revision	Date	Author	Description
1	24/05/2018	M Batey	Privacy policy statement
2	27/04/2021	M Batey	Updated with Novati branding

## Approval History

Revision	Date	Approved by
1	25/05/2018	Les Clayton
2	27/04/2021	Matt Batey

# Privacy Statement

Novati is committed to protecting your privacy. This Privacy Policy details what personal information we collect about you, how we use that information and the rights you have in this respect.

## 1 Who is responsible for your data?

UK Waste Solutions Ltd, trading as Novati, is responsible for your data, and is known as the “Controller” of the data that you provide to us. “Novati” or “the Novati group of companies” comprises UK Waste Solutions Ltd and 707 Ltd. The expression “Novati” means either of these companies.

## 2 What data do we collect?

### 2.1 Personal Data

We only collect basic personal data about you, including name, email address and phone number. Generally, we do not collect special types of personal information, such as race, gender or religion.

### 2.2 Payment Data

We collect payment data that is needed to process payments and for fraud prevention. This may include credit/debit card numbers, bank account numbers, sort codes and other related billing information.

### 2.3 Business Data

We collect further business information that is processed within a contractual relationship with Novati, such as non-personal business addresses, phone numbers and email addresses. This may also include any instructions given, payments made or other such requests.

### 2.4 Site Audits

We may collect information during visits to your premises. This may include written, photographic or video evidence. The purpose of this evidence will be to identify any restrictions that may prevent Novati from providing a suitable service to yourself, such as available space to store waste containers, or restrictions that may prevent a vehicle from accessing the premises.

### 2.5 Special Categories

We may collect Special Categories of personal data for the purposes of arranging access to an event, meeting or seminar. This may include asking you to provide information about your health for the purposes of being considerate of any disabilities or any special dietary requirements that you may have. Any use of this information is based on your consent; if you choose not to provide this information to us, we will be unable to make any necessary precautions.

## 2.6 Publicly Available Data

We may collect data from publicly available sources, such as credit reference agencies or any regulatory agencies, including the Environment Agency.

## 3 How do we collect your data?

We collect your data via several means, including:

1. When you or your business engages us to provide services to you;
2. When you or your business browse, make an enquiry or otherwise interact with us via our website, by email or by telephone;
3. When you attend a Novati event or office;
4. When we attend your premises to provide services;
5. When you or your business offer to provide or provide services to Novati;
6. In some circumstances, we may collect data about you from a third-party source, such as validating your business's credit rating when looking to provision services to you.

## 4 Why do we need your data?

We need your data in order to provide you with the services you have requested, as well as provide you with on-going organisational updates, such as contractual terms, legislative updates and service updates. We do not collect any personal data from you that we do not need to provide and oversee this service for you.

You may choose not to provide your personal data to us, however, this may prevent us from providing you with what you request, and we will notify you accordingly.

## 5 What we do with your data?

All the data we process is processed by our staff in the UK. However, for the purposes of IT hosting and maintenance, this information may be located on servers within the European Union, or within the United States providing third-parties comply with the EU-US Privacy Shield Framework.

We may use your data for the following purposes ("Permitted Purposes"):

1. to provide you with the services requested by you or your business;
2. to identify that you are authorised to trade on behalf of our customers or suppliers;
3. to monitor and assess compliance with our policies and standards;
4. to comply with our legal obligations, regulatory obligations and record keeping obligations; this may include financial and credit checks;
5. to analyse and improve our services and communication to you;
6. to investigate and respond to complaints;
7. for insurance purposes dealing with claims made against or by Novati; this may include passing details onto Novati's insurers, insurance claim handlers, loss adjusters or legal advisers;
8. to comply with court orders and exercise and/or defend our legal rights;
9. to protect the security and manage access of our offices, equipment, IT and communication systems, online platforms, websites and other systems,

preventing and detecting security threats, fraud or other criminal or malicious activities.

With your express consent, we may also process your personal data for the following purposes:

10. to communicate with you through the channels you have approved to keep updated on the latest industry developments, government legislations, announcements, events, projects and any other information about Novati and the services Novati provide;
11. to include you within customer surveys, marketing campaigns, market analysis, sweepstakes, contests or other promotional activities or events;

Regarding marketing-related communication, where legally required, we will only provide you with such information after you have opted in and provide you the opportunity to opt out at any point in time. We do not use your personal data to take any automated decisions affecting either yourself or for creating profiles other than as described above.

## **6 What is the legal basis for processing your data?**

Depending on which of the above Permitted Purposes we use your personal data for, we may process your data on one or more of the following legal grounds:

1. for the legitimate interest reasons;
2. because processing your data is required to meet our legal obligations (e.g. to keep records for tax purposes) and contractual obligations we may have with you or your business;
3. in certain limited circumstances with your express consent.

## **7 Who do we share your data with?**

We may share your personal data with third-parties to help us meet our legal obligations and contractual obligations to you or your business, these may include:

1. our service partners that provide services on our behalf;
2. credit rating, debt collection and similar agencies;
3. government and law enforcement organisations, including the Environment Agency and Her Majesty's Revenue and Customs (HMRC).

Novati take your privacy very seriously and will never disclose, share or sell your data without your express consent, unless we are required to do so by law.

## 8 How long do we keep your data?

Our standard policy is to retain data and information for only as long as it is necessary to meet the purpose(s) for which it is collected (e.g. UK tax law dictates the retention period for financial data). After this time has passed, it is then disposed of in a methodical and secure way.

## 9 What are your rights?

As an individual, you have certain rights over your personal data, which as a data controller Novati are responsible for fulfilling these rights.

### 9.1 Access to your personal data

You have the right of access to the personal data held by Novati. To exercise this right, please email us at [privacy@novati.co.uk](mailto:privacy@novati.co.uk). We endeavour to respond to any requests for information promptly and within the legally required limits.

### 9.2 Updating your personal data

You have the right for the information we collect about yourself to be accurate and up-to-date. If you believe the personal data we hold about yourself is incorrect, please email us at [privacy@novati.co.uk](mailto:privacy@novati.co.uk). Where practically possible, we will aim to resolve any inaccuracies as soon as possible.

### 9.3 Withdrawal of consent

You have the right to withdraw consent for Novati to store your personal data, providing it does not conflict with any legal, regulatory or contractual obligations. If you wish to withdraw consent, please utilise one of the following options:

1. update your preferences via The HUB;
2. click the 'unsubscribe' link at the bottom of a marketing-based email communication;
3. call our Customer Services team on 01636 640744;
4. send an email to [privacy@novati.co.uk](mailto:privacy@novati.co.uk).

### 9.4 Other data subject rights

This privacy statement is intended to provide information about what personal data we collect about you and how it is used. As well as rights of access and updates referred to above, individuals may have other rights in relation to the personal data we hold, such as a right to erasure/deletion, to restrict or object to our processing of personal data and the right to data portability. If you wish to exercise any of these rights, please email us at [privacy@novati.co.uk](mailto:privacy@novati.co.uk).

## 10 Website

This website and its owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. This website complies to all UK national laws and requirements for user privacy.

## 11 Cookies

This website uses cookies to improve the users experience while visiting the website. Where applicable, this website uses a cookie control system allowing the user to allow or disallow the use of cookies on their computer / device on their first visit to the website. This complies with current legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.

Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server, to provide the users with a tailored experience within this website. Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors. This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information [<http://www.google.com/privacy.html>].

Other cookies may be stored to your computer's hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

## 12 Review of this Privacy Statement

We reserve the right to update and change this Privacy Statement to reflect any changes in the way in which we process your data or changing legal requirements. We will review this Privacy Statement at least once every twelve months. In case of any such changes, we will update this document and publish such changes on our website.

## 13 Data controller and contact information

The data controller is UK Waste Solutions Ltd (a limited liability company registered in England under registration no. 4995890 and with its registration address at Alexander House, Cafferata Way, Newark-on-Trent, Nottinghamshire, NG24 2TN). We are registered on the Information Commissioner's Office Register; registration number ZA101567.

If you have any questions about this privacy statement or how and why we process personal data, please contact us at:

The Company Secretary  
UK Waste Solutions Ltd,  
Alexander House,  
Cafferata Way,  
Newark-on-Trent,  
Nottinghamshire  
NG24 2TN

Email: [privacy@novati.co.uk](mailto:privacy@novati.co.uk).

Phone: 01636 640 744