



## **Commercial Data Protection Policy**

### **1. PRIVACY STATEMENT**

1.1 Sharpe's Recycle Oil Ltd is committed to protecting the privacy of your personal data collected in the course of our business. This Data Processing Policy forms part of our Terms and Conditions .

1.2 Our Data Protection Manager is Elaine McEachen who can be contacted at Arlington Works, Arlington Road, St Margarets, Twickenham, TW1 2BB and can be contacted on 020 8892 0502 or [admin@sharpesoil.co.uk](mailto:admin@sharpesoil.co.uk)

1.3 We will always comply with relevant data protection legislation, including the Data Protection Act 1998 ("DPA") and General Data Protection Regulation ("GDPR") as applicable, when processing your personal data. Further details on the DPA and GDPR can be found at the Information Commissioner's Office website ([www.ico.gov.uk](http://www.ico.gov.uk)). For the purposes of data protection legislation, we will be the "controller" or "data controller" of all personal data held in respect of this Policy.

### **2. DATA PROCESSING**

2.1 In this Policy we use certain terms from the relevant data protection legislation;

- (a) "data subject" i.e. anyone who can be identified from personal data;
- (b) "controller/data controller" i.e. a business which holds personal data and decides how it should be processed;
- (c) "processor/data processor" i.e. a business which holds personal data on behalf of a controller and processes it in accordance with the controller's instructions;
- (d) "personal data" i.e. recorded information we hold about you and from which you can be identified. It may include contact details and other personal information.
- (e) "processing" i.e. doing anything with personal data including collecting, using, storing, accessing, disclosing and destroying it.

2.2 We will process your personal data in accordance with the following principles:

- (a) all personal data must be processed lawfully, fairly and in a transparent manner;
- (b) all personal data must be collected for one or more specified, explicit and legitimate purposes and not processed in a manner incompatible with those purposes;
- (c) all personal data shall be restricted to what is adequate, relevant and limited for those purposes;
- (d) all personal data shall be kept accurate and up to date (and reasonable steps must be taken to erase or rectify inaccurate personal data);

(e) all personal data must be kept for no longer than is necessary for those purposes;

(f) all personal data must be protected by appropriate technical and organisational security measures to prevent unauthorised or unlawful processing and accidental loss, destruction or damage.

2.3 We may collect, use and store your personal data, as described in this Policy, where necessary in order to:

(a) perform any contract to which you are party or in order to take steps at your request prior to entering into a contract;

(b) exercise our legitimate business interests;

2.4 We will only process your personal data to the extent that it is necessary for the purposes specified in this Policy and we will keep the personal data we store about you accurate and up to date. Where it is inaccurate or out of date, it will be destroyed - please let us know if your personal details change or if you become aware of any inaccuracies in the personal data we hold about you.

2.5 We will not keep your personal data for longer than is necessary for the purposes specified in this Policy. Where it is no longer required, it will be, destroyed or erased as appropriate.

2.6 We will never sell your personal data or make it available to any third parties without your prior consent (which you are free to withhold) except where we are required to do so by law;

2.7 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

2.8 We reserve the right to amend this Policy from time to time without prior notice. You are advised to check the website regularly for any amendments

### **3. WHAT INFORMATION DO WE COLLECT AND WHY?**

3.1 We will only collect personal data to the extent that it is required for the specific purpose made clear to you at the time. We will only process personal data in accordance with relevant data protection legislation.

3.2 If you contact us, we will keep a record of that contact including your contact details and any relevant account information.

3.3 We will hold your personal data on our systems for as long as:

(a) your account remains valid; and/or

(b) any contracts you make with us are live; and/or

(c) is necessary to comply with our legitimate business interests; and/or

(d) is necessary to comply with our legal obligations; and/or

(e) you have indicated you are happy for us to do so

3.4 We may use your personal data:

- (a) to carry out our obligations arising from any contracts entered into between you and us;
- (b) to provide you with information, products or services that you request from us or which we feel may interest you, including changes and updates;
- (c) in accordance with our legitimate business interests and legal obligations.

## **4. YOUR RIGHTS**

4.1 You have the following rights in respect of your personal data held by us. Please send all requests in respect of these rights to our Data Protection Manager:

- (a) to access your personal data;
- (b) to be provided with information about how your personal data is processed (this information is set out in this Policy);
- (c) to have your personal data corrected where necessary (please contact our Data Protection Manager promptly should you become aware of any incorrect or out-of-date information);
- (d) to have your personal data erased in certain circumstances (please refer to the appropriate data protection legislation or consult the ICO for details);
- (e) to object to or restrict how your personal data is processed;
- (f) to have your personal data transferred to yourself or to another business.

4.2 If you consider that we have not complied with this Policy or the relevant data protection legislation in respect of your personal data or someone else's, you should raise the matter with our Data Protection Manager. Any such breach will be taken seriously and will be dealt with in accordance with the relevant data protection legislation.

4.3 You have the right to take any complaints about how we process your personal data to the Information Commissioner:  
Information Commissioner's Office Wycliffe House Water Lane Wilmslow  
Cheshire SK9 5AF  
<https://ico.org.uk/concerns/>  
0303 123 1113.

4.4 For more details, please consult the relevant data protection legislation or address any questions, comments and requests regarding our data processing practices to our Data Protection Manager.