

1 INTRODUCTION

- 1.1 circularity.com is operated by Ecosurety Limited, (“We”). We are committed to protecting and respecting your privacy.
- 1.2 This policy together with our website terms of use and our Terms and Conditions (and any other documents referred to in them) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we treat it. By visiting <https://www.circularity.com/> you are accepting and consenting to the practices described in this policy.
- 1.3 For the purpose of the Data Protection Act 1998 (the “Act”), the data controller is Ecosurety Limited of 1190 Park Avenue, Aztec West, Bristol, BS32 4FP.

2 INFORMATION WE MAY COLLECT FROM YOU

- 2.1 We may collect and process the following data about you:
 - (a) **Information you give us.** You may give us information about you by filling in forms on our site <https://www.circularity.com/> (the “site”) or by corresponding with us by e-mail or otherwise. This includes information you provide when you register to use our site, create your profile, participate in discussion boards, enter into a competition, provide responses to a survey or when you report a problem with our site. The information you give us may include your name, email address and gender.
 - (b) **Information we collect about you.** When you visit our site we may automatically collect the following information:
 - (i) technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and version, operating system and platform;
 - (ii) information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
 - (c) **Information we receive from other sources.** We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties, (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

3 COOKIES

- 3.1 Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them, please see our Cookies Policy.

4 USES MADE OF THE INFORMATION

- 4.1 We use the information held about you in the following ways:
 - (a) **Information you give to us.** We will use this information:
 - (i) to provide the service on the site and to provide you with the information and services as required or that you request from us;
 - (ii) to notify you about changes to our services;
 - (iii) to ensure that content from our site is presented in the most effective manner for you and for your computer; and
 - (iv) to validate your email address and confirm your eligibility to use our site.
 - (b) **Information we collect about you.** We will use this information:
 - (i) to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - (ii) to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
 - (iii) to allow you to participate in interactive features of our service, when you choose to do so; and
 - (iv) as part of our efforts to keep our site safe and secure.
 - (c) **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

5 DISCLOSURE OF YOUR INFORMATION

5.1 We may share your information with selected third parties including:

- (a) Business partners, suppliers and sub-contractors for the performance of any of the services we provide.
- (b) Analytics and search engine providers that assist us in the improvement and optimisation of our site.

5.2 We may disclose your personal information to third parties:

- (a) In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- (b) If Ecosurety Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- (c) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our website terms of use or our Terms and Conditions and other agreements; or to protect the rights, property, or safety of Ecosurety Limited, our users, customers or others.

6 WHERE WE STORE YOUR PERSONAL DATA

- 6.1 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the administration of the Website and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.
- 6.2 All information you provide to us is stored on secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 6.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

7 YOUR RIGHTS

- 7.1 You have the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at Ecosurety Limited, 1190 Park Avenue, Aztec West, Bristol, BS32 4FP or info@circularety.com.
- 7.2 Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

8 ACCESS TO INFORMATION

- 8.1 The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

9 CHANGES TO OUR PRIVACY POLICY

- 9.1 Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

10 CONTACT

- 10.1 Questions, comments and requests regarding this privacy policy are welcomed and should be sent by email to info@circularety.com.