

Plastics Recyclers Europe Privacy Policy

We understand that your trust in us, is Plastics Recyclers Europe's most important asset (hereinafter referred to as "PRE", "we", "us"). As such, your privacy is essential to us.

This Privacy Policy (hereinafter referred to as "Privacy Policy") is applicable, *inter alia*, to (i) our websites <https://www.plasticsrecyclers.eu>, <https://www.plasticsrecyclersam.org>, <https://www.eucertplast.eu>, <https://www.recyclclass.eu> (hereinafter referred as the "Websites"), and (ii) all (commercial) relations between PRE and its customers, prospects, members and business partners.

This Privacy Policy includes information about the personal data collected by PRE, as well as the manner in which PRE uses and processes these personal data.

PRE wishes to emphasize that it always attempts to act in accordance with (i) the Belgian Privacy Law of 8 December 1992 on privacy protection in relation to the processing of personal data and/or Privacy Policy (ii) the EU General Data Protection Regulation of 2016 concerning the protection of individuals with regards to the processing of personal data, the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred as "the GDPR"), and (iii) all (future) Belgian laws regarding the implementation of this Regulation.

Visiting the Websites, appealing on our services, subscribing to our communication tools or attending web seminars and conferences implies explicit approval of the data subject (through disclosure of personal information or opt-in) of the Privacy Policy and consequently of how we collect, use and process personal data.

The terms used in this agreement shall have the meaning given in the national data protection laws or in the GDPR. If a term is used or defined in both legal frameworks, its definition or meaning shall be the one of the GDPR.

For the purposes of the present agreement, 'personal data', 'processing', 'controller' and 'processor' and shall be defined as by Article 4 "Definitions", para. 1, 2, 7 and 8 of the GDPR:

- 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

- 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

- 'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

- 'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

Types of Personal Data

Provided the purpose and its proportionality of the collection, PRE can collect and process the following personal data:

- Title
- First Name
- Family name
- Sex
- Nationality
- E-mail address

- Telephone or mobile numbers
- Company information
- Position
- Geographical location data
- Credentials required to access restricted webpages, online tools, forums
- Invoicing details, payment and billing information
- Images/videos
- Vehicles plate numbers
- All personal data freely provided to PRE (e.g. disclosed in the correspondence with PRE).

PRE also automatically collects anonymous information regarding data subject's use of the Websites. As such, PRE shall, for example, automatically log which sections of the Websites and Platform data subjects visit, which web browser is used, which website is visited when obtained access to the Website. We cannot identify data subjects through these data, but it allows PRE to draw up statistics regarding the use of the Websites.

Methods of Personal Data Collection

- Collaboration with PRE
- Incoming and outgoing correspondence with PRE
- Visiting the Websites or the PRE office
- Subscription to the newsletter
- Appealing on the services of PRE, whether or not through the Websites and/or whether or not via a mobile device
- Subscription and registrations to PRE webinars/seminars/events/workshops/etc.
- Taking pictures and video recording, taken during events or voluntarily received
- Exchanging of business cards
- Verification of one's identity (e.g. when a data subject contacts customer service)

All personal data, collected by PRE, are thus expressly and voluntarily provided by the data subject.

Providing certain personal data is (sometimes) a requirement to be able to enjoy certain services (e.g. to gain access to certain parts of the Websites, to subscribe to newsletters, to participate in certain activities and events). In this respect, it shall be indicated which data must be provided mandatory and which data is optional.

Use of Personal Data

- Performance of the agreements stipulated with PRE (incl. follow-up thereof)
- Responding to inquiries (whether or not received through the contact form)
- Optimizing the quality, management and content of the Website
- Sending newsletters and press releases
- Targeted marketing and advertising, membership updates based on data subject's communication preferences and – where applicable – upon explicit consent
- Creating statistics
- Drawing-up quotes (articles, papers, minutes and other written statements)
- Follow-up meetings
- Creation of an account and the confirmation thereof
- Providing support/assistance (e.g. in case of problems)
- Conducting members' satisfaction studies, surveys and other market research
- Registration of visitors to the office/building of PRE
- Confirmation of the subscription or registration to a webinar/seminar/event/etc.
- Issuing of invoices and the collection thereof
- Securing parking spaces

Processing takes place on the following legal grounds, as the case may be:

- Upon prior consent to the processing of data subject's personal data for one or more specific purposes
- Processing is necessary for the performance of the agreement with PRE or to take steps at data subject's request prior to entering into an agreement
- Processing is necessary for compliance with a legal obligation to which PRE is subject

- Processing is necessary to protect data subject's vital interests or of another natural person
- Processing is necessary for the performance of a task carried out in the public interest
- Processing is necessary for the purposes of the legitimate interests pursued by PRE or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, which require protection of personal data

Disclosure of personal data to third parties

PRE shall not disclose personal data to third parties, unless it is necessary in the context of performing the agreement and optimisation thereof (including but not limited to PRE). In this respect, personal data might be disclosed to payment providers, software providers, cloud partner, external IT-consultants, insurance and employment companies, financial institutes and service providers (among others, translators and photographers).

If it is necessary that PRE discloses personal data to third parties, the third party concerned is required to use your personal data in accordance with the provisions of this Privacy Policy.

Notwithstanding the foregoing, it is however possible that PRE discloses personal data:

- to the competent authorities **(i)** if PRE is obliged to do so under the law or under legal or future legal proceedings and **(ii)** to safeguard and defend your rights.
- If PRE, or the majority of its assets, are taken over by a third party, in which case your personal data – which PRE has collected – shall be one of the transferred assets
- Exchange of the information among members – they do not have contractual agreements among each other

In all other cases, PRE will not sell, hire out or pass on personal data to third parties, unless **(i)** approval from the data subject, or **(ii)** has completed a data processing agreement with the third party in question, which contains the necessary guarantees regarding confidentiality and privacy compliance of your personal data.

Cross-border processing of personal data

Any transfer of personal data outside the European Economic Area (EEA) to a recipient whose domicile or registered office is in a country which does not fall under the adequacy decision enacted by the European Commission, shall be governed by the provisions of a data transfer agreement, which shall contain **(i)** the standard contractual clauses, as referred to in the 'European Commission decision of 5 February 2010 (Decision 2010/87/EC)', or **(ii)** any other mechanism pursuant to privacy legislation, or any other regulations pertaining to the processing of personal data.

Storage of Personal Data

Unless a longer storage period is required or justified **(i)** by law or **(ii)** through compliance with another legal obligation, PRE shall only store personal data for the period necessary to achieve and fulfil the purpose in question, as specified in the Privacy Policy under 'Use of personal data'.

Data Subject's Privacy Rights

In light of the processing of personal data, data subjects (you) enjoy the following privacy rights:

- Right of access to your personal data
- Right to rectification, completion or update of your personal data
- Right to delete your personal data ('right to be forgotten'). (PRE wishes to point out that in this context certain services will no longer be accessible and/or can no longer be provided after deletion or pending a request for deletion for certain required personal data)
- Right to limit the processing of your personal data
- Right to transferability of your personal data
- Right to object to/oppose the processing of your personal data

If a data subject wishes to invoke privacy rights, he or she can do so by submitting a written request by email (info@plasticsrecyclers.eu) or delivering it to PRE by post at:

Plastics Recyclers Europe
Avenue de Cortenbergh 71
1000 Brussels
Belgium

In principle, data subjects can exercise these rights free of charge. In addition, data subject can always, via the personal account, update, modify and/or verify personal data, which were required to submit when registering.

If a data subject no longer wishes to receive newsletters or information about the services of PRE, he or she can unsubscribe at any time by clicking the "unsubscribe" button, where available, or by notifying the sender.

Security of personal data

PRE undertakes to take reasonable, physical, technological and organisational precautions in order to avoid **(i)** unauthorised access to personal information, and **(ii)** loss, abuse or alteration of personal data.

PRE shall store all personal data, which it has collected on its servers.

Notwithstanding PRE's security policy, the checks it carries out and the actions it proposes in this context, an infallible level of security cannot be guaranteed. Since no method of transmission or forwarding over the internet, or any method of electronic storage is 100% secure, PRE is, in this context, not in a position to guarantee absolute security.

Finally, the security of data subjects' accounts will also partly depend on the confidentiality and complexity of their passwords. PRE will never ask for passwords, meaning that data subjects will never be required to communicate it personally. If nonetheless communication of the password was forwarded to a third party – offering for example additional services – this third party will have access to the account and to the personal data. In such case, data subjects are liable for the transactions which occur as a result of the use made of their account. PRE therefore strongly advises the data subjects, to immediately change passwords and contact us when breaches have been reported.

Update of Privacy Policy

PRE is entitled to update this Privacy Policy by posting a new version on the Websites. As such, it is strongly recommended to regularly consult the Websites and the page displaying the Privacy Policy, to make sure that data subjects are aware of any changes.

Other websites

The Websites may potentially contain hyperlinks to other websites. When data subjects click on one of these links, they might be redirected to another website or internet source that could collect information about them through cookies or other technologies. PRE does not bear any responsibility, liability or control authority over these other websites or internet resources, nor about their collection, use and disclosure of personal data. Data subjects must check the privacy statements of these other websites and internet sources in order to be able to judge whether they act in accordance with the Privacy Legislation.

Contact PRE

For questions and/or remarks about this Privacy Policy or the manner in which PRE collects, uses and/or processes personal data, please contact us:

- Via e-mail: info@plasticsrecyclers.eu

or

- Via post: Plastics Recyclers Europe
 Avenue de Cortenbergh 71
 1000 Brussels
 Belgium

In case data subjects are not satisfied with the way PRE handled inquiries and/or remarks or have any complaints about the way PRE collects, uses and and/or processes personal data, data subjects have the right to lodge a complaint with the Privacy Commission.