

Data Protection and Privacy Policy

Policy Statement:

HF Recycle Limited is committed to protecting the privacy and personal data of our employees, customers, suppliers, and other stakeholders. This Data Protection and Privacy Policy outlines our practices for collecting, using, storing, and safeguarding personal data in compliance with applicable data protection laws, including the General Data Protection Regulation (GDPR).

1. Data Collection and Use:

a. Purpose and Consent: We collect and process personal data for specific and legitimate purposes, with the consent of the data subjects or under a lawful basis as defined by applicable data protection laws.

b. Data Minimisation: We only collect and retain personal data that is necessary and relevant for the intended purposes. We strive to keep personal data accurate, complete, and up-to-date.

c. Lawful Processing: Personal data is processed in accordance with applicable data protection laws and the rights of the data subjects. We will not process personal data unlawfully or for purposes incompatible with the original collection.

d. Sensitive Data: We handle sensitive personal data, such as health information, with additional care and only process it when necessary and in compliance with relevant laws and regulations.

2. Data Security and Storage:

a. Security Measures: We implement appropriate technical and organisational measures to ensure the security and confidentiality of personal data. This includes protection against unauthorised access, loss, destruction, alteration, or disclosure.

b. Data Retention: Personal data is retained only for as long as necessary to fulfil the purposes for which it was collected, unless a longer retention period is required by law or for legitimate business purposes.

c. Data Transfers: We ensure that any transfer of personal data outside the European Economic Area (EEA) is done in compliance with applicable data protection laws and adequate safeguards are in place to protect the data.

3. Individual Rights:

a. Access and Rectification: Data subjects have the right to access their personal data and request corrections or updates if it is inaccurate or incomplete.

b. Erasure and Restriction: Data subjects may request the erasure or restriction of

their personal data under certain circumstances, as provided by applicable data protection laws.

c. Data Portability: Data subjects have the right to receive their personal data in a structured, commonly used, and machine-readable format and transmit it to another controller when technically feasible.

4. Privacy Notice:

a. Transparency: We provide clear and concise privacy notices to individuals, informing them about the purposes, legal basis, and rights associated with the processing of their personal data.

b. Consent and Withdrawal: We obtain valid consent for the processing of personal data when required. Data subjects have the right to withdraw consent at any time, where applicable.

5. Data Breach Notification:

a. Reporting and Response: We have procedures in place to promptly detect, investigate, and respond to data breaches. In the event of a data breach, we will notify affected individuals and the appropriate supervisory authorities in accordance with applicable legal requirements.

Responsibility:

The responsibility for implementing and maintaining this Data Protection and Privacy Policy rests with the management team of HF Recycle Limited. All employees and contractors are expected to support and adhere to the principles outlined in this policy.

By signing below, I acknowledge that I have read and understood the HF Recycle Limited Data Protection and Privacy Policy and agree to comply with its principles and requirements.

A handwritten signature in black ink, appearing to read 'Jadav V.' with a stylized flourish.

Mr. Vrushabh Jadav
Recycling Plant General Manager, HF Recycle Limited.
Date: 01/10/2021