Data Privacy Policy

Version 1.1 (September 2025)

Your privacy is very important to us which is why we want to inform you about how we process your personal data in accordance with GDPR, Data Protection Act 2018 and e-privacy regulations as amended from time to time (the "Law").

We comply with the Law when delivering our waste recovery, disposal and recycling services to you ("Services").

We aim to give you more transparent and clear information about how we process your personal data and how you have some processing controls. To help you understand how we process personal data, we have divided the Privacy Notice into different chapters. In each chapter, we describe in more detail what personal data we have about you and how we use it. We also provide information about your personal rights, for example how to get access to your data and how you can request to terminate the usage of your data.

Our Services, the use of this website and this notice applies to persons above the age of sixteen years of age and this Policy only applies to Service customers accessing our website and using our Services in Ireland.

Who is the controller of your personal data?

We are Clean (Irl) Refuse & Recycling Co. UC T/A Clean Ireland Recycling, companies' registration number 152666, located at Ballinagun, Creegh, Kilrush, Co. Clare, Ireland. Our Eircode location is V15 AV82.

Clean Ireland Recycling ("We" "us" and "our") is the data controller of your personal data while delivering our Services to you.

Why we process your personal data

We process your personal data to deliver our Service to you. We may rely on one or more of the following reasons in Law to process your personal data. Which section of the Law that may apply, depends on the way in which you engage with us and our use our Services.

6.1 (a) you have given your consent to the processing by use of our website or support Services.
6.1 (b) our processing is necessary for the performance of our contract for our Services.

6.1 (c) Legitimate Interests, where we may process your personal data as part of the Services where it would be necessary to do so. An example of this is contacting you about Service Information.

When we collect personal data

The following systems we have installed process your personal data. We regulate and control these third-party IT processors by seeking their compliance with our IT and Cyber security Policy as ensure they providers theirs to us.

Below are the technical systems currently used by us to process personal data during delivery of our Services.

Service Provider Name	Purpose for Service
Linkus	Phone
Site Ground	Website host
AMCS	Customer Account Software
AMCS	Website Customer Account Portal
GreenEye Vision Limited	CDS Waste Imaging Service
Formula Networks Limited	Network hosts
Global Pay	Payment Processing Gateway
Microsoft Applications	Emails
CCTV – Mid West Fire & Security	Onsite Safety and Security

Your personal account data

We begin to collect personal data about you when you set up a customer account with us. Customer set up may be actioned online, in which case we collect your personal data via our website or by phone in which case we will record the terms of your contract request before issuing you with a copy of those terms. We only collect personal data that is proportionate and necessary for us to delivery our Services to you. To set up a Service user account, we collect, your name, your address and your preferred method of payment and phone contact details. We may collect sensitive personal data where you disclose this to us for convenience of service. AMCS in Ireland provide the software we use to process your waste account information. If you have a CIR online account or you can edit your personal data under your account online.

Financial data

To purchase our Services, we need to collect payment and or financial information about you which is considered personal data. This includes card payment information and bank account details occasionally directly but mostly only our Global Pay processes your account information. We may retain bank details from time to time.

Phone recording data

We record some calls for training purposes and to substantiate a contract where it was concluded by phone. This enables us to improve our services and apply the correct terms of contract to the delivery and payment of your Service.

Marketing data

We will only conduct direct marketing where you have consented to it. Where you have consented to marketing you may withdraw your consent at any time. To do so just contact us at admin@cleanirl.com and or by telephone at (0818) 600300.

Service Information

We provide customers with Service Information at the Service updates section of our website. We may from time to time need to contact you directly, where doing so, is necessary and urgent and or when customers are alerted to an immediate service change. Such service contact is not marketing but a condition of our Service delivery. It allows us to ensure that we can directly reach our customers where weather service disruptions, price increases or other urgent and important service-related information is communicated to you quickly and efficiently.

Waste Image data

Support services for the delivery of our waste and recycling processing are necessary. These support services process images. Some image processing is defined as personal, about you personally, such as CCTV which is required for safety and security purposes. Some of these images are of your receptable waste (which are not of you personally but are of household waste) relinquished to us for further processing as a recyclable product.

Waste is a processed product after your disposal of it under contract with us. Our use of the CDS Waste Imaging System is to ensure that hazardous items or contaminants are not placed incorrectly into the wrong waste receptacle that could result in injury, harm or contamination. CDS is a waste segregation tool used to educate our customers about safe and correct waste segregation. It is not our intention nor the purpose of the service to assess your consumption analyse the images outside of the scope of hazards and contaminants. By using CDS we prevent injury to our employees and premises from hazardous contaminants and or prevent contamination of your waste product which we process further to help the environment. We are obliged to process waste in accordance with environmental conditions of our licence and legislation about the circular economy. You can read more about that on the government website at https://www.gov.ie/en/department-of-climate-energy-and-the-environment/policy-information/circular-economy.

We have a dedicated website tab for CDS Service to provide you with further information about GreenEye Vision Limited, our third party CDS imaging service support. There are also useful hints and tips about responsible disposal and how to protect your information security when disposing of personal documents into recycling.

GreenEye Vision Limited capture waste images and provide analysis of the images to identify contaminants. They ensure that the waste images selected protect general privacy. We do not process the images to analyse personal data contained in the images, but to assess contamination rates and how we might address this better.

In fact, waste is not in itself personal data but may contain items from which a person could be identified such as bank statements. We process household waste for recycling which needs image analysis to improve product. Our CDS system and our service support providers ensure

that low resolution settings on cameras protect images that may, inadvertently capture personal data, such as addressed envelopes or letters containing personal data. The low-resolution imaging ensures that such items cannot be line read and customers should responsibly shred personal data documents and place them into a clear plastic bag in the recycling receptacle to ensure information security and privacy.

CDS waste images are reviewed for hazardous waste and or contaminants without any identifiable mark that could attribute the image to the household. This is to ensure your general privacy. Images are also only scanned for contaminant items and or hazardous materials that are described on our website. Items outside this scope are not reviewed. We ensure to always protect your personal privacy during the process. Images with no contamination identified are deleted after one month and images identified with contaminants are deleted after one year following issue of a notice to our customer.

Radio Frequency Identification data

We use Radio-Frequency Identification technology ("Bin Tags") to identify waste receptacles and attach the correct Service charges to the correct Service user and account holder.

An RFID system includes a tag, an antenna, and a reader that transmits and receives data wirelessly. Unlike barcodes, RFID tags are read when our trucks lift waste onto the truck deck for ingestion. The RFID is linked within AMCS to the account holder details. This is how we bill correctly.

These bin tags do not collect personal data they only emit a signal to our truck receivers that allows us to match the correct bin to the correct account for the correct payment.

Customer log in data

As a Clean Ireland Customer, we want to provide you with a seamless customer experience. So that our customers can always access their own personal data and ensure account management control, we provide a customer log in portal on our website. The portal processes your personal data when you register as a new customer with us. The portal technology is integrated onto our website.

Protection of Personal data and information security

We ask our customers to protection their information security by shredding items that could be used to conduct identification fraud. Customers should ensure private or confidential documents are shredded and placed into a clear bag in the paper recycling bins. More about this can be found on our cleaner bin website information page.

Social media data

We have social media accounts to ensure that our customers can reach us when they need to. These links are embedded on our website. We are not responsible for the processing of your personal data when you use connected social media platforms to communicate with our accounts. Where you require information about your personal data processed while using those platforms you should read their own Privacy and Data Protection Policies for reference. We might record your personal data for example in our AMCS customer management system where you have reached out to us on one of our social media accounts to support or resolve a query you send us.

Where we store your data

We use AMCS, an Irish service provider to process your customer account data. You customer data is hosted on a European service with an Irish company located in Limerick. We also use Green Eyed Vision Limited an Irish company to process waste images as a service. These providers host personal data on the Assure cloud platform to ensure international cloud security standards are met within a protected network.

International data transfers

We ensure that your personal data is hosted within the European Economic Area ("EEA") on our AMCS system. Where personal data is transfer to a country outside of the EEA we ensure compliance with local and international Law. We ensure any third-party processors we rely on to deliver our Services do so in accordance with local and European Law and the scope of processing is limited by contract in accordance with Law. Any such transfer of your personal data will be carried out in compliance with applicable laws. Personal data processing may occur in the Philippines, which is subject to its own Data Privacy Commission and ensures protection of privacy subject to the Republic Act 10173 and Data Privacy Act of 2012. We ensure our third-party CDS providers only transfer data in accordance with European Law.

For transfers outside the EEA, Clean Ireland Recycling Use Service providers who incorporate Standard Contractual Clauses as safeguards to protect your personal data.

Who accesses your data

Our highly trained customer Service agents in Ireland and authorised employees of third parties may access your data to deliver our Service. We do not knowingly transfer your personal data outside of the EEA other than what is declared to us. Where this does occur, your personal data is accessed and not transferred in the Philippines, a county subject to stringent data protection laws, regulations and controls.

International data transfers

Personal data may be made available to third parties, outside of the EEA but is only only access to provide you with customer support and or our Services. This is in accordance with our terms and conditions.

How long we keep customer personal data

We are legally obliged to retain customer records for a period of 7 years from the date a customer leaves our Services. We may retain your personal data for a longer period where we have a legal obligation such as at the request of a statutory authority, enforcement authority and or by Court Order.

Who we are legally obliged to share your personal data with

We are obliged to share your personal data with statutory authorities, such as county councils and the Gardai where we are requested to do so. We ask authorities to submit such requests in writing to document the legal basis for each request.

What are your rights?

Where we process your personal data as a Service user you are entitled to avail of the rights and protections of Law. These are referred to as Subject Access Rights and entitle you to have certain rights with respect to how your personal data is controlled and processed. However, these rights are not absolute and are subject to Law and competing legal obligations placed on us.

We will ask you security questions to ensure you are the person entitled to receive personal data requested. Only the subject of the personal data ie. the customer named on the account may request their own personal data.

Right to access:

You have the right to request your personal data, which we process. You can contact us and we will provide you with the necessary documents to request and receive your personal data. We may ask you for identification or an account number for security reasons.

Right to portability:

Whenever we process your personal data, you have the right to request a copy of your data and to ask for a copy to be transferred to you or to another party at your instruction. This only includes the personal data you have submitted to us. We cannot request third parties to do so.

Right to rectification:

You have the right to request rectification of your personal data if details are incorrect, including the right to have incomplete personal data completed. We are happy to do this or you may do so by accessing your account through the online portal we provide on our website.

Right to erasure

You have the right to erase any personal data processed by us except for the following situations:

(a) you have an ongoing matter with Customer Service

(b) you have an open order which has not yet been shipped or partially shipped

(c) you have an unsettled debt with us, regardless of the payment method

(d) if you are suspected or have misused our services within the last four years

(e) your debt has been sold to a third party within the last three years

(f) if you have made any purchase, we will need to keep your personal data to evidence compliance with financial legislation in relation to your transaction and for book-keeping purposes

(g) if we are required to retain the data for legal and or regulatory purposes.

Your right to object to processing

You have the right to object to direct marketing, including profiling analysis made for direct marketing purposes.

You can opt out from direct marketing by the following means:

*By following the instruction in each marketing email

*By editing the settings of your account through online portal access

*By contacting us directly to the email address admin@cleanirl.com or by telephone.

Right to restriction:

You have the right to request that we restrict the processing of your personal data. We may refuse that request but where we do, we will provide a reason to you for that refusal. A request you submit, may or may not affect your terms of Service. Please read our terms and conditions for further information.

How can you exercise your rights?

We take data protection very seriously and therefore we have dedicated customer service personnel to handle your requests in relation to your rights stated above. You can always reach them at admin@cleanirl.com

Data Protection Officer:

We have appointed a Data Protection Representative to ensure that we continuously process your personal data in an open, accurate and legal manner. You can contact our Data Protection Representative at admin@cleanirl.com and write DPR in the subject matter.

Right to complain with a supervisory authority:

In accordance with GDPR you have the right to exercise the right of complaint. Where you feel we have not performed in way concordant with GDPR you should let us know first before reverting to the Data Protection Commissioner's Office. If, after having given us the right to respond you feel that your complaint was not addressed in a satisfactory way, you can contact the Data Protection Commissioner's Office on their website at https://www.dataprotection.ie

Or by post at:

6 Pembroke Row
Dublin 2
D02 X963
Ireland

Updates to our Privacy Notice:

We may need to update our Privacy Notice. The latest version of the Privacy Notice is always available on our website. We will communicate any material changes to the Privacy Notice, for example the purpose of why we use your personal data, the identity of the Controller or your rights under a Service Information notification procedure.