

ECONORTH LTD.

# Privacy

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## Policy

John Thompson

Next Review Date: 11.02.26



**This policy applies to all EcoNorth Staff / Internships / Consultants / Placements who work on behalf of the company and is reviewed annually to ensure its continuing suitability.**

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## Privacy Policy

### 1. Introduction

EcoNorth takes privacy very seriously and is committed to the robust protection of personal data. This Privacy Policy governs the way EcoNorth may collect, process and disclose personal data from Data Subjects who use EcoNorth’s websites and all services offered by EcoNorth, and is in line with current data protection laws in the UK and Ireland. It applies to all EcoNorth’s employees and all parties working on behalf of the company.

### 2. Company Registration

EcoNorth is registered at Companies House (registration number 2274277). Our registered office is 11 Enterprise Court, Cramlington, Northumberland, NE23 1LZ, United Kingdom.

EcoNorth is registered with the Information Commissioner’s Office (ICO) as a Data Controller. Our registration number is ZA481793.

EcoÉireann is a branch of EcoNorth, registered at Companies House (registration number 2274277).

EcoÉireann is registered at Companies Registration Office (CRO) (registration number 908445). Our registered branch is 6 Fern Road, Sandyford, Dublin, D18 FP98, Ireland.

### 3. Reference Documents

- UK’s General Data Protection Regulation.
- UK’s Data Protection Act 2018.
- EU’s General Data Protection Regulation.
- Ireland’s Data Protection Act 2018.
- EcoNorth’s Data Protection Policy.

### 4. Definitions

“EcoNorth” or “we” or “us” or “our” means EcoNorth Ltd.

“Personal data” means any information relating to an identified or identifiable natural person. In legal terms, a natural person is a person that is an individual human being, distinguished from the broader category of a legal person, which may be a private (ie business entity or non-governmental organisation) or public (ie government) organisation. An identifiable natural person is one who can be identified directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier or to one or

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more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“Special category data” means sensitive personal data which includes racial or ethnic origin, political opinions, religious or philosophical beliefs, dietary choices, trade union membership, physical or mental wellbeing, a Data Subject’s sex, gender identity or sexual orientation and the processing of genetic data or biometric data for the purpose of uniquely identifying a Data Subject. In order to lawfully process special category data, both a lawful basis under Article 6 of the GDPR and a separate condition for processing under Article 9 must be identified; these do not have to be linked.

“Data 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.

“Data Subject” means an individual on whom data is collected and processed. This can be an organisation’s customers, contractors, suppliers and employees for example.

“Processing” means any operation or set of operations 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.

## 5. Privacy Promise

EcoNorth promises to:

- Process personal data fairly, lawfully and transparently.
- Process personal data for the legitimate purpose for which that personal data was originally collected.
- Only collect personal data that is essential for the fulfilment of that legitimate purpose.
- Retain personal data only when necessary and delete it once its legitimate purpose has been fulfilled.
- Ensure all personal data that is processed is accurate and kept up to date.
- Ensure that robust security measures are in place to protect against unauthorised or unlawful processing of personal data.
- Ensure Data Subjects know how to exercise their rights in relation to personal data.

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## 6. Personal Data

EcoNorth may process standard personal data which has been collected from a variety of sources. This includes:

- Personal data that Data Subjects provide us with directly eg name, address, email address, telephone number, bank and invoice details.
- Personal data we collect automatically through our websites eg Data Subjects' IP addresses.
- Personal data we collect from other sources eg publicly available information such as social media blogs and postings.

EcoNorth will only process special category data where we have identified both a lawful basis and a separate condition for processing, in accordance with the General Data Protection Regulation. This may include:

- Personal data you provide us with directly eg details of your physical / mental health.

## 7. Purposes

EcoNorth may collect, process and disclose Data Subjects' personal data only for specific and legitimate purposes, in order to provide them with our services and to operate our business, including:

- Provide Data Subjects with progress updates.
- Process Data Subjects' payments.
- Respond to customer service requests and support Data Subjects' needs.
- Use feedback from Data Subjects to improve our websites and services.
- Use information in the aggregate to understand how Data Subjects as a group use the services and resources provided on our websites.
- Personalise Data Subjects' experiences.
- Analyse our performance.
- Meet our legal requirements.

## 8. Legal Basis

EcoNorth will only process personal data where the law allows us to do so, as follows:

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- Where it is necessary for performing a contract EcoNorth has entered into with you.
- Where we need to comply with a legal obligation.
- Where, on the rare occasion, it becomes necessary to protect your vital interests.
- Where it is in the public interest.
- Where we have your informed consent.
- Where it is necessary for the purposes of the legitimate interests of EcoNorth.

## 9. Data Sharing

Personal data is processed within the UK and Ireland only. It is shared within EcoNorth, where appropriate, and with our business partners and trusted affiliates where permission has been granted or where we are required to do so by law.

## 10. Data Retention

EcoNorth retains personal data for as long as we need it for the purpose for which it is being processed and in line with legal requirements, after which we employ measures to permanently destroy / delete / anonymise it securely when there is no longer a legal or consumer need for it to be retained.

## 11. Web Browser Cookies

Please refer to EcoNorth's Cookie Policy for information.

## 12. Data Security

EcoNorth has adopted appropriate data collection, storage and processing practices and robust security measures to protect all personal data against unauthorised access, improper use, alteration, disclosure or destruction or accidental loss.

In the event of a suspected data breach, EcoNorth will notify Data Subjects and the Information Commissioner's Office (ICO) in the UK and/or the Data Protection Commission in Ireland of this event where we are legally required to do so.

## 13. Data Subjects' Rights

Data Subjects have the following rights with regard to the processing of their personal data:

- The right to ask for information about what personal data is being processed and the rationale for such processing.

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- The right to get access to their personal data that is being processed, as well as to request copies of that personal data.
- The right to rectification ie to ask for modifications to their personal data in the event that their personal data is not up to date or accurate.
- The right to withdraw their previously given consent for the processing of their personal data for a purpose.
- The right to object to the processing of their personal data.
- The right to object to a decision based on automated processing and profiling.
- The right to be forgotten (or the right to erasure) ie the right to ask for their personal data to be deleted.
- The right to data portability ie the right to ask for a transfer of their personal data.
- The right to claim compensation for damage caused by EcoNorth's breach of the Data Protection Act.

If Data Subjects have concerns about how EcoNorth processes their personal data, they can make a Data Subject Access Request (DSAR) by email to [enquiries@econorth.co.uk](mailto:enquiries@econorth.co.uk) or by post to:

Data Protection Department  
EcoNorth Ltd  
11 Enterprise Court  
Cramlington  
Northumberland  
NE23 1LZ  
United Kingdom

Data Subjects in Ireland can make a Data Subject Access Request (DSAR) by email to [enquiries@ecoeireann.ie](mailto:enquiries@ecoeireann.ie) or by post to:

Data Protection Department  
EcoÉireann  
6 Fern Road  
Sandyford  
Dublin  
D18 FP98  
Ireland

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## 14. Complaints

If Data Subjects wish to complain about how their personal data is being handled, they should contact the Data Protection Department, as detailed above, in the first instance so the situation can be investigated.

If they still feel that their personal data is not being handled appropriately according to the law, they can contact the Information Commissioner's Office (ICO) at:

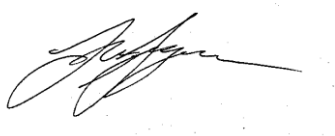
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
United Kingdom  
(Tel: 0303 123 1113)

Data Subjects based in Ireland should contact the Data Protection Commission (DPC) at:

21 Fitzwilliam Square South  
Dublin 2  
D02 RD28  
Ireland  
(or use their online tool: <https://forms.dataprotection.ie/contact>)

## 15. Policy Review

EcoNorth's Privacy Policy is reviewed annually, or earlier if there are changes to the processing of personal data or applicable legislation. Any amendments that are made will be shared with the EcoNorth team at these times.



John Thompson  
Executive Director  
14.02.25