



# PERSONAL DATA POLICY

RETUR

## TABLE OF CONTENTS

<b>1</b>	<b>INTRODUCTION AND PURPOSE.....</b>	<b>2</b>
<b>2</b>	<b>DATA CONTROLLER.....</b>	<b>2</b>
3.1	Legal basis for data processing.....	3
3.2	Sharing of personal data .....	3
<b>4</b>	<b>STORAGE AND SECURITY OF YOUR PERSONAL DATA.....</b>	<b>3</b>
4.1	Deletion procedure .....	4
<b>5</b>	<b>YOUR RIGHTS REGARDING YOUR PERSONAL DATA.....</b>	<b>4</b>
5.1	Submitting complaints to the Danish Data Protection Agency.....	4
<b>6</b>	<b>REVISION OF RETUR'S PERSONAL DATA POLICY.....</b>	<b>5</b>



## **1 INTRODUCTION AND PURPOSE**

This personal data policy applies to Retur, which operates a family of non-profit Producer Responsibility Organisations managing the producer responsibility for electronics, batteries, packaging, and textiles on behalf of importers and manufacturers. Information about these organisations can be found at retur.dk, elretur.dk, emballageretur.dk, batteriretur.dk, and tekstilretur.dk.

The purpose of this policy is to inform you, as a member and user of Retur, about how we process your personal data, including which personal data we have collected.

We respect the protection of personal data submitted digitally or otherwise, and we are aware of the need for appropriate protection and proper processing of all personal data that we receive or collect.

## **2 DATA CONTROLLER**

Retur is the data controller for processing the personal data we have received about you. You will find the data controller's contact details below.

Retur  
Høje Taastrup Boulevard 30,1.  
2630 Taastrup  
Denmark

Company registration no.: DK-44513498  
Telephone: +45 33 36 91 98  
Email: retur@retur.dk

Retur has appointed Jesper Bøttcher as the contact person.

## **3 THE SCOPE AND PURPOSE OF THE COLLECTION OF PERSONAL DATA**

When we provide you and your company with member services.

When you use member pages and contact forms on the websites retur.dk, elretur.dk, emballageretur.dk, batteriretur.dk, and tekstilretur.dk, we need your name, email, telephone, and user information to process your inquiry.

When you sign up for our newsletter, we need your name, email, phone number, and company name. These newsletters are divided by topic. You can subscribe to and unsubscribe from the newsletters you want. We collect information to deliver the newsletter to you.

If you send us questions via email, we will use the information you provide to answer your enquiry.



When you hand in used devices at municipal recycling sites or other collection points, we do not examine the device (a device being a data-carrying mobile phone, computer, or iPad/tablet) for personal data. Retur and our partners ensure that data is deleted from the device before it gets a new life in Denmark or Europe or that the device is disassembled to recycle the materials for new products.

### **3.1 Legal basis for data processing**

The legal basis for our processing of your personal data is as follows:

- Your consent, cf. the Data Protection Regulation article 6 paragraph 1 a, and/or
- The accepted agreement/contract/order, cf. the Data Protection Regulation article 6 paragraph 1 b, and/or
- Legislation, cf. the Data Protection Regulation article 6 paragraph 1 c, and/or
- For the data controller or a third party to pursue a legitimate interest (unless the data subject's interests or fundamental rights and freedoms that require the protection of personal data take precedence, especially if the data subject is a child), cf. the Data Protection Regulation article 6 paragraph 1 f. The legitimate interests relate to handling our members' producer responsibility in an environmentally responsible manner.

### **3.2 Sharing of personal data**

We do not sell your personal data to third parties, and we do not transfer your personal data to third countries. Third countries are non-EU/EEA countries.

We use external companies to provide our services in the best possible way. These external providers are data processors and will, in some circumstances, process personal data in connection with their provision of services to us. Our data processors only process personal data following our instructions and in compliance with the legal requirements for data processors.

We have made data processing agreements with our data processors, which is our guarantee that they comply with applicable regulations on the protection of your personal data.

## **4 STORAGE AND SECURITY OF YOUR PERSONAL DATA**

We process your personal data securely and confidentially in accordance with applicable legislation, including the Personal Data Regulation and the Data Protection Act.

Your data will be used solely for the purpose for which they were collected and will be deleted when this purpose is fulfilled or no longer relevant.



We have taken technical and organisational measures to prevent your data from being accidentally or illegally deleted, published, lost, degraded, made available to unauthorised people, misused, or otherwise processed in violation of the legislation.

#### 4.1 Deletion procedure

Your data will be deleted immediately after there is no longer a contractual basis and legislation that may require us to store it for an extended period.

### 5 YOUR RIGHTS REGARDING YOUR PERSONAL DATA

According to the Data Protection Regulation, you have several rights regarding your submitted personal data, including how Retur processes it.

If you wish to exercise your rights, you must contact the data controller. The contact details of the data controller are in section 2 above.

You have the following rights:

- You have the right to be **informed** about what personal data has been collected
- You have the right to **access** your personal data and how this data is processed
- You have the right to **rectify** incorrect personal data
- You have the right to **delete** your personal data
- You have the right to **revoke your consent**
- You have the right to **limit** how your data is processed
- You have the right to **data portability**
- You have the right to **object**
- You have the right **not to be subject to a decision based solely on automatic processing, including profiling**

#### 5.1 Submitting complaints to the Danish Data Protection Agency

If you believe that Retur's processing of your personal data does not comply with the rules of the Data Protection Regulation, you should initially contact the data controller at Retur.

However, you can always submit a complaint to the national supervisory authority, which in Denmark is the Data Protection Agency. You can find more information about submitting such a complaint at [www.datatilsynet.dk](http://www.datatilsynet.dk).



## **6 REVISION OF RETUR'S PERSONAL DATA POLICY**

This personal data policy may be updated in accordance with Retur's requirements and circumstances or if this is required by law. We therefore recommend that you regularly read updates of this personal data policy on our website.

Updated on 18 September 2023