

# **Privacy Policy: - Urban PGM Recycler Pvt Limited**

## **INTRODUCTION**

Urban PGM respects your privacy and is committed to protecting your personal data. This privacy notice explains how Urban PGM uses and protects any personal data that we may collect about you and informs you of your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

## **1. IMPORTANT INFORMATION AND WHO WE ARE**

### **Purpose of this privacy notice**

This privacy notice aims to give you information on how Urban PGM collects and processes your personal data through your use of our online and offline services.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### **Controller**

When we mention "Urban PGM", "we", "us" or "our" in this privacy notice, we are referring to Urban PGM Recyclers Pvt Limited, with CIN Number U37100HR2022PTC107863 registered in India, as processing your data.

### **Contact details**

Should you wish to contact us, our contact details are as follows:

Company Secretary  
Urban PGM Recyclers Pvt Limited  
141, Sector 6, IMT Manesar, 122050  
Gurugram , Haryana, India

### **Changes to your personal data**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes title, first name, maiden name, last name, title and date of birth.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, transactions made by you, your preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and yard services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences. We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may analyse the number of times you visit a yard to calculate the percentage of customers visiting a specific yard at a given time. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## **3. HOW IS YOUR PERSONAL DATA COLLECTED**

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you: create an account, either at our facility or on our website.

**Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your browsing devices, browsing actions and patterns.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources.

## 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Where we need to perform the contract we are about to enter into or have entered into with you.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal or regulatory obligation.

## 5. Purposes for which we will use your personal data

We use the information collected on our web site to deliver research, market intelligence, New Prospective Business, Adverts, advisory and go-to-market services and to enhance site visitors' experience.

1. To Register You as new customer
2. To Process and Deliver your Transaction.
3. To Manage Relationship
4. To Enable you in participation of Surveys
5. To Administer and Protect our business & Website.
6. To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you
7. To use data analytics to improve our website, services, marketing, customer relationships and experiences.
8. To make suggestions and recommendations to you about goods or services that may be of interest to you.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### Promotional offers from us:

We may use your identity, contact, technical, usage and profile data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us, used our services or provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

**Third-party marketing,** We will get your express opt-in consent before we share your personal data with any company for marketing purposes.

**Opting out** You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us

at [info@UrbanPGM.com](mailto:info@UrbanPGM.com) at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a transaction.

## 6. DATA TRANSFERS

We share your personal data within the Urban PGM Group and their Business Associates or any of our customers. This may involve transferring your data outside the Indian Premises.

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. These rules are called "binding corporate rules". Many of our external third parties are based outside the Indian territory so their processing of your personal data will involve a transfer of data outside India.

Please contact us at [Info@UrbanPGM.com](mailto:Info@UrbanPGM.com) if you want further information on the specific mechanism used by us when transferring your personal data out of India.

## 7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. DATA RETENTION

### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

## 10. GLOSSARY

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** Comply with a legal or regulatory obligation.

### THIRD PARTIES

Internal Third Parties

External Third Parties

Service providers acting as processors based in the UK and Europe who provide IT and system administration services.

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.