

RECAPP

Privacy Policy

Privacy Policy

Last reviewed on: October 18th, 2020

Thank you for using our Veolia operated mobile application, **Recapp** (and/or Facilities, referred to herein below). Your privacy and the protection thereof are of paramount importance to us.

Important information

This Privacy Policy, as amended or otherwise changed from time to time, explains the manner in which **Veolia Environmental Services Emirates LLC (and/or any Veolia entities forming part of the Veolia Group)**, hereinafter referred to as “**Veolia**” or “**Veolia Group**”) collects, uses, maintains, stores, transfers and discloses User personal information obtained through the Veolia operated mobile application, **Recapp** (“**Recapp**”, “**we**”, “**us**”, “**our**”, “**Mobile Application**”, “**Mobile Apps**” “**Veolia Facilities**” “**Facilities**” or “**Platforms**” for the purposes of this Privacy Policy) available on iOS and Android.

Please be advised that this Privacy Policy does not confer any information that we may receive about you through channels external to Veolia’s Facilities, communication and data infrastructures, networks and/or systems.

Please further be advised that, all personal information collected and processed in the United Arab Emirates, is done fairly, lawfully, securely, accurately, transparently, with the information being retained for no longer than is necessary (or as required by law) and being processed only in accordance with your rights.

Definitions

Terms which are not defined in this Privacy Policy shall have the meanings ascribed to them in the [Terms and Conditions](#) of the Veolia Facilities.

User consent: When you (hereinafter referred to as the “**user**”, “**you**” or “**your**”) access and use any content we own or operate on the Veolia Facilities, which is owned, operated, maintained or mandated under service by Veolia; you as the User, expressly consents to the data practices prescribed in this Privacy Policy. This is further supported, but not dependent on your application for and/or the creation of a User account.

Data processor: means any person who processes your personal information on behalf of the data controller. Veolia is a data processor of your personal information and shall process your personal information directly, or may do so through our third parties, such as project partners who may be chosen by us for the purposes of furthering the individual and entities’ business of the Veolia Group.

Data controller: means a person who determines the purposes for and the manner in which any personal information are to be processed. Veolia is the data controller of your personal information. Data protection is important to us and we adhere to all applicable data protection laws and regulations, which include (but are not limited to) the [Constitution of the UAE](#), the UAE Civil Code, the UAE Penal Code, Internet of Things Regulatory Policy and Procedures of the UAE Telecommunications Regulatory Authority (accessible [HERE](#)); the UAE Federal Law No. (1) of 2006 on [Electronic Commerce and Transactions](#); the UAE Federal Law 5 of 2012 on [Combatting Cybercrimes](#) and other applicable data protection and privacy laws, regulations and practices (the “**UAE Regulations**”) for the purposes mentioned in this Policy.

Project Partner(s): means third party partners of Veolia, which presently include, but are not limited to: UAE local and national authorities, application developers, application maintenance service providers and redeem platforms.

What does this policy cover ?

We are committed to adopting the highest standards when it comes to how we collect, use and protect your personal information, and have accordingly developed this privacy policy (the “**Privacy Policy**” or “**Policy**”), which:

- Sets out the types of personal information we collect;
- Explains how and why we collect and use your personal information;
- Explains when and why we may share personal information within Veolia and with other organisations or third parties;
- Explains how we protect the personal information we collect; and
- Explains the rights and choices you have in relation to your personal information.

This Policy applies if you use our services (referred to in this Policy as “**Services**”). Using our Services means:

- Ordering Services from our Mobile Application;
- Redeeming products / gifts from our Project Partners network;
- Using any of our Platforms or Mobile Applications;
- Being a member of any of our rewarding schemes; and/or
- Taking part in our promotions & competitions and registering to receive our newsletters and offers.

This Policy also applies if you contact us or we contact you about our Services.

Personal Information we collect

When you register to our services, you consent to and we may collect:

- Your personal details, including, but not limited to:
 - your first and last name
 - physical address(es)
 - email address(es)
 - phone number(s);
 - profile picture;

- Your geo-location;
- Your account login details, such as:
 - your username; and
 - the password (encrypted) that you have chosen.

(collectively, hereinafter referred to as “**Personal Information**” or “**Personal Data**”)

Certain Services, such as one-time passcode (OTP) authentication may require collection, use, processing, transfer and storage of your phone number and possibly other data. We may associate that phone number to your mobile device identification information.

When you request services with us using our Mobile Apps we may collect:

- Information about your online requests (for example: what, when, where you requested the service, when and what gift you have redeemed);
- Information about your online browsing behaviour on our Mobile Application and information about when you click on one of our adverts (including those shown on other organisations’ websites);
- Information about devices you have used to access our Services (including the make, model and operating system, IP address and mobile device identifiers);
- Information about your precise geolocation.

When you use any of our reward program(s), we may collect:

- Transaction information, including any online services you earn points for and how you use your points, coupons, and vouchers within the Veolia Group or with other Project Partners;
- Share the information about your reward activity including points and redeeming gifts with our Project Partners’ platforms.

When you contact us or we contact you or you take part in promotions, competitions, surveys or questionnaires about our Services, we may collect:

- Personal information you provide about yourself;
- Details of emails and other digital communications we send to you including information about the emails you open and links in them that you click on;
- Your feedback and contributions to customer surveys and questionnaires.

Other sources of Personal Information

We may also use personal information from other sources, such as: specialist companies that supply information, online media channels, our Project Partners and public registers. We may collect the following types of personal information about you from other sources: contact details, credit history, purchases, interests, preferences, together with other types of publicly/non-publicly available information. This other personal information helps us to review and improve the accuracy of the personal information we hold.

We may be required by law to collect Personal Information about you, or as a consequence of any contractual relationship which we have with you and with any Project Partner, but we do ensure to you that we will only use your Personal Information when and how the applicable laws allow us to, as well as in accordance with this Privacy Policy.

If you choose not to provide your Personal Information to be collected and used in accordance with this Policy, you will still be able to visit our Facilities, but you may not be able to access certain options, products or Services; and in some cases we may not be able to fulfill a Service which you may request. In such a scenario, Veolia shall have the right to discontinue the provision of any options, products, or Services; however, we shall notify you if this is the case at the time.

Please be advised that your Personal Information collected and processed in the United Arab Emirates, is done so in accordance with the best data protection practices and principles from the applicable laws and regulations. As such Veolia will:

- (a) only collect data for specified and lawful purposes; and not use that information for any reason that would be incompatible with those purposes (**purpose limitation**)
- (b) only collect as much data from users as is actually needed in order to achieve the above purposes and no more (**data minimisation**)
- (c) retain this data only for so long as it is actually needed in order to achieve the above purposes and no longer, unless the law requires otherwise (**storage limitation**)
- (d) use data encryption standards that fulfil the requirements of the competent UAE authorities.
- (e) when developing software and hardware, that 'attempts to make systems free of vulnerabilities and robust to attacks to the best possible extent through continuous testing, authentication safeguards and adherence to best practices' are made (**privacy by design**)

- (f) classify data collected on the basis of the anticipated harm that could result should such information be disclosed without consent (**data classification**) and further comply with the applicable data localisation requirements.

Why and how we use your Personal Information

We will only use your Personal Information when and how the applicable laws allow us to. Most commonly, we will use your Personal Information to provide the Services you have requested and in the following ways:

- To process your orders and Services;
- For the creation of and securing of your User account on the Veolia Facilities;
- To prudently identify you and perform the necessary identity verification through our own efforts, or through our partners or service providers;
- To improve the quality of your User experience when you interact with Veolia's Facilities and Services; and/or
- For the management of the accounts you hold with us.

This is done so that we can provide the Services to you in line with our contractual obligations with you; and/or with reference to the Terms and Conditions and this Privacy Policy, within Recapp.

Personalise your experience

We may use your personal information to personalise your experience and to make our services and marketing messages we send to you more relevant and interesting, as this is in our legitimate business interests. Where necessary, we will obtain your consent first. We may use your Personal Information for this purpose in the following ways:

- Using your online browsing behaviour, as well as your online requests and Services, to help us better understand you as a customer and provide you with personalised offers and Services;
- Providing you with relevant marketing communications (including by email, post, telephone, SMS, or online advertising), relating to products and services we offer, and those of our suppliers and partners. As part of this, online advertising may be displayed on our Facilities and on other organisations' websites and online media channels. We may also measure the effectiveness of our marketing communications and those of our suppliers and partners;
- To help us to better understand you and provide you with services and marketing communication that are relevant to your interests, we combine Personal Information we collect from our Facilities and other available sources.

Contact and interaction with you

We may use your Personal Information when we communicate with you, in order to:

- Contact you about our Services, for example by phone, email or post, or to respond to your enquiries or other requests received;
- Manage promotions and competitions you take part in, including those we run with our suppliers and Project Partners;
- Invite you to take part in and manage customer surveys, questionnaires and other market research activities, carried out by Recapp and by other organisations on our behalf;
- Send you a one-time password (OTP) to verify the ownership of the e-mail address or the mobile number provided when your User account is created;
- Send you administrative notifications or other communications: i.e. related to User Activity, security, support and maintenance or other advisory services, sent via in-App, mobile SMS and/or email; and
- Notify you about important changes or updates to Veolia Facilities.

Manage and improve our day-to-day operations

We analyse information about how you use our services to:

- Manage and improve our Mobile App;
- Help to develop and improve our product range, Services, information technology systems, know-how and the way we communicate with you;
- Detect and prevent fraud, money laundering or other crime.

It is in our legitimate business interests to use the information provided to us for this purpose, so that we can understand any issues with our Services, in order to improve it.

Please be advised that we may process your Personal Information without your knowledge or consent where this is required or permitted by law.

Veolia adheres to all applicable legislative provisions and data protection laws of each jurisdiction it operates in; hence Veolia shall retain, store and process all User specific data as recommended by the regulations.

Sharing Personal Information

We may share your Personal Information with third parties under the following circumstances:

Veolia Group

We may share your Personal Information within the Veolia Group of associated companies, which are based in various locations globally and that Personal Information may be transferred and used for the purposes listed above.

Retail Partners

We may share your Personal Information and other information related to Recapp, with other companies and retail partners, that will enable them to provide their services and/or products in relation to the redemption of your gifts. For example, if you redeem your gift using Recapp, we may give the relevant retail partner your name, contact details, and address so that they can deliver your redeemed items.

Service Providers

We work with carefully selected service providers that carry out certain functions on our behalf. These include, for example, companies that help us with technology services, storing and combining data. We only share personal information that enables our service providers to provide their services.

Some of the service providers we work with operate online media channels, and they place relevant online advertising for our Services, as well as those of our suppliers and our retail partners, on those online media channels on our behalf.

Sharing Personal Information with other organisations

We may share Personal Information with other third parties or organisations in the following circumstances:

- To any law enforcement agencies, regulators, government of public officials, in order to comply with any applicable law, *subpoenas*, court orders, government requests, in order to establish, exercise or defend our legal rights. This includes providing personal information to others for the purposes of preventing fraud and reducing credit risk;

- to business partners with whom we have a business relationship to provide with our Services, products, process your Service requests and redeem your points, better predict and deliver content that may interest you;
- to an organisation we sell or transfer (or enter into negotiations to sell or transfer) any of our businesses or any of our rights or obligations under any agreement we may have with the App User. If the transfer or sale goes ahead, the organisation receiving your personal information can use your personal information in the same way as us.
- to any other successors in title to our business; and/or
- to anyone to whom we transfer or may transfer our rights and duties under our agreement with you.

Transfer of your Personal Information

Your Personal Information may be transferred to, stored, and processed in a country that is different from your country of residence, or our country of incorporation. Whenever we transfer your Personal Information outside of the United Arab Emirates, or any other territory, we will ensure that it is transferred to countries that have been deemed to provide an adequate level of protection for your Personal Information, in accordance with the applicable laws and regulations.

In any case, we have additionally put in place appropriate safeguards in accordance with applicable legal requirements to ensure that your Personal Information is adequately protected.

In the event your Personal Information is transferred to a foreign jurisdiction, it may be subject to the laws of that jurisdiction and we may be required to disclose it to the courts, law enforcement or governmental authorities in those jurisdictions but we will only do so where required by applicable laws.

How we protect Personal Information

We take the protection of your Personal Information seriously and in so doing, we maintain physical, technical, and organisational safeguards, including the use of industry-standard data encryption technology. Further, we have implemented restrictions related to the storage of your Personal Information to secure your Personal Information from unauthorized access, use, alteration and destruction.

Veolia's Facilities are scanned on a regular basis for security holes and known vulnerabilities, in order to best ensure its security. Your Personal Information is contained behind secured networks and is

only accessible by a limited number of individuals who have special access rights to such systems and are required to keep the information confidential.

Please note that no transmission over the Internet or any method of electronic storage can be guaranteed to be absolutely 100% secure, however, we will take all reasonable endeavours to secure data and the ability to access your Personal Information.

Without prejudice to our efforts on protection of your data, nothing contained in this Privacy Policy constitutes a warranty of security of the Veolia Facilities, and you agree to transmit data at your own risk. Please note, that Veolia does not guarantee that your data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

If you do receive any suspicious communication of any kind or request, do not provide your information and report it to us by contacting our offices immediately. Please also immediately notify us if you become aware of any unauthorised access to or use of your User account.

Since we cannot guarantee against any loss, misuse, unauthorised acquisition, or alteration of your data, please accept that you play a vital role in protecting your own Personal Information, including: the adoption of sufficient safety measures such as your choosing of an appropriate password of sufficient length and complexity and to not reveal this password to any third-parties.

Retention

We keep records for as long as required to:

- a) manage purchases, bookings, memberships and provide the other relevant products or Services anticipated by this Privacy Policy, including keeping you up-to-date with our marketing;
- b) personalise the products, Services and communications with you;
- c) comply with the applicable record retention legal requirements.

When deciding how long to keep your Personal Information after our relationship with you has ended, we take into account our legal obligations and regulators' expectations.

Further, we will ensure that all records of your Personal Information are retained in the format which accurately represents the information received, to ensure that the information is usable and accessible for future references, in compliance with your rights.

If you wish to request that we no longer use your information to provide you services, please email us at uae.recycling@veolia.com.

However, we will retain and use your registration information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

If during a period of twelve (12) months, you do not connect to the App, all your Personal Information will be deleted from the App database and the points collected and not redeemed will be lost.

Marketing Communications

All marketing communications we may send to you will provide you with a way to withdraw your consent to future marketing. If you no longer wish to receive promotional materials, we will provide you with an option through which you may “opt-out” from receiving these communications or by choosing to unsubscribe, this will remove you from marketing lists.

Please note that should you unsubscribe from marketing communications you will still receive operational and service messages from us regarding the services to be executed using the App and responses to enquiries made to us, and that we may hold your details on a suppression list so we don't send you marketing communications in the future.

Cookies and similar technologies

Cookies are small data files that allow the Mobile App to collect and store a range of data on your desktop computer, laptop or mobile device. When you interact with the Veolia Facilities, we try to make your experience simple and meaningful. Veolia presently does not use cookies or similar technologies, however, when you visit our platform, the third party service providers and/or retail partners may use cookies for various purposes in order to help provide the Services to you and to improve your customer experience.

Third party service providers and our retail partners may use cookies to do the following:

Deliver relevant online advertising

They may use cookies to help deliver online advertising that is believed to be the most relevant to you on our App and their organisations' websites.

Cookies used for this purpose are often placed on our App by other organisations, and always with our permission. These cookies may collect information about your online behaviour, such as your IP

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address and information about your purchase / request history or the content of your shopping basket. This means that you may see adverts for other organisations on our Facilities.

Your choices when it comes to Cookies

You can use your settings to accept or reject new cookies and to delete existing cookies. You can also set your application to notify you each time new cookies are placed on your computer or other device.

If you choose to disable some or all cookies, you may not be able to make full use of our Facilities.

If you wish to withdraw your consent at any time, you will need to delete the cookies using your settings, from within the Application.

Aggregate Data and Data Analytics

We may aggregate personal information and remove any identifying elements in order to analyse patterns and improve our marketing and promotional efforts, to analyse the use of our Facilities, to improve our content and Service offerings, and to customize our Mobile Application content, layout, Services, and we may appoint third parties to do this on our behalf, as set out above.

We gather certain usage information like the number and frequency of visitors to our Facilities. We only use such data in the aggregate. This collective data helps us to determine how much our customers use parts of our Facilities, and do research on our users' demographics, interests, and behaviour to better understand and serve you.

Your Rights

Please be advised that under the UAE Regulations, you, as a data subject and User of our Mobile Application may have certain rights regarding your Personal Information.

If you would like to discuss or exercise such rights with respect to your Personal Information (in so far as they are applicable), please contact us via email at uae.recycling@veolia.com.

If you are concerned that any of the Personal Information we hold about you is incorrect, or out of date, please write to the address above to report your concerns and we will take appropriate steps to amend our records.

Please note that we will likely require additional information from you in order to honor such requests.

Links

Our Mobile Apps may contain links to other websites operated by other organisations that have their own privacy policies. Please make sure you read the terms and conditions and privacy policy carefully before providing any Personal Information on a website as we do not accept any responsibility or liability for websites of other organisations.

Social Media

We may in the future operate channels, pages and accounts on some social media sites to inform, assist and engage with customers. We may monitor and record comments and posts made on these channels about us so that we can improve our services.

Veolia will not be responsible for any information posted on those sites other than information we have posted ourselves. We do not endorse the social media sites themselves or any information posted on them by third parties.

Children

Our Facilities are not directed towards children. If you're under the age required to manage your own User account, you must have your parent or legal guardian's permission to use a User account. Please have your parent or legal guardian read this Privacy Policy, together with the Terms and Conditions with you.

If you're a parent or legal guardian, and you allow your child to use the Veolia services or access the Veolia Facilities, then this Privacy Policy, together with the Terms and Conditions applies to you and you're responsible for your child's activity on the Facilities and/or services.

Veolia does not and will not knowingly solicit or collect information from anyone who is not of legal age. Should we retrospectively become aware that a minor has provided us with Personal Information where such Services and / or Facilities are unavailable to minors, we will erase such information immediately and close the related User account.

Notification of Changes to this Privacy Policy

We may revise, amend, update or supplement this Privacy Policy when needed, to reflect necessary changes, i.e. changes in law, our Personal Information collection and usage practices, the features of Veolia Facilities, or certain advances in technology. If we are going to use your Personal Information in a manner different from that stated at the time of collection, we will notify you. All changes will

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become effective when posted unless indicated otherwise. We encourage you to review this Privacy Policy periodically.

Privacy Concerns

If you have any concerns about our compliance with applicable privacy laws or this Privacy Policy email us at uae.recycling@veolia.com.