

PRIVACY POLICY

1. INTRODUCTION

Wheelabrator Technologies Holdings Inc. ("WTI") is a private limited company registered in the State of Delaware whose principal place of business is at 100 Arboretum Drive, Suite 310, Portsmouth, NH 03801. WTI UK Limited is a wholly owned subsidiary of WTI registered in the UK under company number 01332476 whose registered office is at Cannon Place, 78 Cannon Street London EC4N 6AF. The terms "**Wheelabrator**", "**we**", "**us**" and "**our**" in this policy shall refer to both WTI and WTI UK Limited as applicable.

We are a "data controller" for the purposes of the General Data Protection Regulation 2016/679 ("**GDPR**").

We are committed to protecting your privacy and processing your personal data fairly and lawfully in compliance with data protection law and the GDPR.

In the course of our business we may need to gather and use "**Personal Data**" about you, by which we mean any information about you from which you can be identified, such as your name or contact details. The purpose of this privacy policy ("**Privacy Policy**") is to inform you of how we will process your Personal Data and the measures and processes we have put in place to ensure its adequate protection.

2. WHEN WE PROCESS YOUR PERSONAL DATA

We will only process your Personal Data, where:

- (a) you have given your consent to such processing (which you may withdraw at any time, as detailed at section 7 below);
- (b) the processing is necessary to provide our services under a contract with you or through our website;
- (c) the processing is necessary for compliance with our legal obligations; and/or
- (d) the processing is necessary for our legitimate interests or those of any third party recipients that receive your personal data.

By "**processing**", we mean the collection, recording, storage, use, disclosure and any other form of operations or dealings with your Personal Data.

3. PERSONAL DATA WE COLLECT AND HOW WE USE IT

3.1 Website use and registration

We collect Personal Data from you when you voluntarily provide such information, including but not limited to when you register with us to open an account to access and use our Services, such as our ePay Bill Payment Services, Special Waste Profile Services, or Contractor Training Centre Services.

You may be asked to choose a username and password for access to certain Services, and to provide various types of information, some of it relating to the governmental or corporate entity on behalf of which you will be using our Services, some of it related to individuals who will be authorized users of the Services. The information you may be asked to provide in order to register for the Services, includes, without limitation:

- (a) your company's or municipality's name and contact information;

- (b) the names, work phone numbers and work email addresses of your employees who will be using the Site and our Service(s); and
- (c) Payment information (credit card details or bank account information to ACH transfers), if applicable.

We also collect Personal Data and transactional information about bills and payment of those bills if and when you use our ePay Bill Payment Service, including when you pay your bills through the Service. Although payment information is collected through the ePay Bill Payment Site, it is never stored by Wheelabrator. All payment information entered through the Site is directly delivered to and is processed by a third party service provider.

By voluntarily providing us with Personal Data, you are consenting to our use of it in accordance with this Privacy Policy. If you provide Personal Data to us through the Site(s), you acknowledge and agree that such Personal Data may be transferred from your current location to the offices and servers of Wheelabrator and the authorized third parties referred to in this policy located in the United States and other countries.

3.2 **Individuals who work for our customers and suppliers**

Corporate organisations are not data subjects, although any individuals who work for them are. If you work for or otherwise represent one of our corporate customers or suppliers and you are engaging with us on behalf of that organisation, whether through our website or otherwise, we may collect and process your name, work email address, work phone number, work contact address, position within your employment, area of employment (e.g. marketing, sales, procurement) and details of your visits to our premises.

If you engage with us on behalf of a customer or supplier, we usually collect your Personal Data through you sending us emails and other correspondence, business cards, and/or when you are named as an authorized person to trade on behalf of your employer. It is necessary for us to collect and process this Personal Data to provide your employer with requested services and to identify persons authorized to trade on behalf of our customers and suppliers.

3.3 **Careers**

Our website provides you with the ability to view and apply for job opportunities with us. We use a third party provider named ADP to provide this service. Any applications made using the website careers service and Personal Data provided through it is with ADP and subject to ADP's privacy policy (which is available on ADP's website and which we recommend you read before applying).

If you otherwise apply for a job with us directly, we may collect and process any Personal Data you provide to us in connection with your application as it is necessary for us to do so to take steps requested by you and required by us prior to potentially entering into a contract with you.

3.4 **Marketing**

We may use your Personal Data to contact you about the services and products we offer which we think would be of interest to you. The information we send you will always be in relation to the services or products you have requested from us or similar products or services to those which you have previously acquired, or indicated your interest in acquiring, from us.

The way we communicate with you in this way is based on what is known as our legitimate interest, and we will only ever send you communications that you would reasonably expect and have a minimal impact on your privacy.

If you receive email communications from us and don't want to in the future, please use the unsubscribe link within the email and we will stop sending you this information via email. In addition, if at any time you wish not to receive any future communications or you wish to have your name deleted from our mailing lists, please contact us at the details provided in section 10 below.

3.5 **Other processing activities**

We may otherwise process your Personal Data in connection with the management of our relationship with you for the following purposes:

- (a) for monitoring and assessing compliance with our policies and standards;
- (b) for administrative purposes in relation to the security and access of our systems, premises, platforms and secured websites and applications;
- (c) for administrative purposes in relation to data backup and disaster recovery;
- (d) to comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory bodies;
- (e) to comply with court orders and exercise and/or defend our legal rights; and
- (f) as otherwise permitted or required by any applicable law or regulation.

3.6 In certain circumstances it will be necessary for you to provide us with your Personal Data, to enable us to manage our operations, to provide services to you or your employer or to comply with our statutory obligations. In other circumstances, it will be at your discretion whether you provide us with Personal Data or not. However, if you decide not to supply any of the Personal Data we request, this may mean that we are unable to maintain or provide services or products to you or your employer.

3.7 We make every effort to maintain the accuracy and completeness of your Personal Data which we store and to ensure all of your Personal Data is up to date. However, you can assist us with this considerably by promptly contacting us if there are any changes to your Personal Data or if you become aware that we have inaccurate Personal Data relating to you. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete Personal Data that you provide to us.

4. **WHEN WE MAY DISCLOSE YOUR PERSONAL DATA**

We do not and will not sell, rent out or trade your Personal Data. We will only disclose your Personal Data in the ways set out in this notice and, in particular, to the following recipients:

- (a) to any of our group companies (including those outside of the EEA, see below);
- (b) to third parties who process your Personal Data on our behalf (such as our systems providers, database maintainers or cloud providers);
- (c) to third parties who process your Personal Data on their own behalf but through providing us or your employer with a service on our behalf (such as our suppliers);
- (d) to companies providing services for money laundering checks, credit risk reduction and other fraud and crime prevention purposes and companies providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such information is shared;
- (e) to any third party to whom we assign or novate any of our rights or obligations;

- (f) to any prospective buyer in the event we sell any part of our business or assets; and/or
- (g) to any government, regulatory agency, enforcement or exchange body or court where we are required to do so by applicable law or regulation or at their request.

5. INTERNATIONAL TRANSFERS OF PERSONAL DATA

The Personal Data we collect from you may be transferred to (including accessed in or stored in) a country or territory outside the European Economic Area ("**EEA**"), including to countries whose laws may not offer the same level of protection of Personal Data as are enjoyed within the EEA, such as the US. We will ensure that any such international transfers are made subject to appropriate or suitable safeguards as required by the GDPR.

6. HOW WE PROTECT YOUR PERSONAL DATA

We are committed to safeguarding and protecting Personal Data. We have implemented and continue to maintain appropriate technical and organizational measures to ensure a level of security appropriate to protect any Personal Data provided to us from accidental or unlawful destruction, loss, alteration, or unauthorized disclosure.

7. YOUR RIGHTS IN RELATION TO THE PERSONAL DATA WE COLLECT

7.1 If you wish to:

- (a) update, modify, delete or obtain a copy of the Personal Data that we hold on you;
- (b) restrict or stop us from using any of the Personal Data which we hold on you, including by withdrawing any consent you have previously given to the processing of such data; or
- (c) where any Personal Data has been processed on the basis of your consent or as necessary to perform a contract to which you are a party, request a copy of such Personal Data in a suitable format,

you can request this by emailing us at the address set out in section 10 below. We endeavor to respond to such requests within a month or less, although we reserve the right to extend this period for complex requests.

7.2 In any of the situations listed above, we may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorized disclosure of data.

7.3 We reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your Personal Data, and for any additional copies of the Personal Data you request from us.

8. HOW LONG WE WILL HOLD YOUR PERSONAL DATA FOR

We will only retain your Personal Data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements.

9. HOW WE UPDATE OR CHANGE THIS PRIVACY POLICY

9.1 We may change or update parts of this Privacy Policy in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. We will do this by updating this Privacy Policy on our website. You will not necessarily be directly notified of such a change. Therefore, please ensure that you regularly check this Privacy Policy so you are fully aware of any changes or updates.

9.2 This Privacy Policy was last updated on September 7, 2018.

10. HOW YOU CAN CONTACT US

If you have any queries about the contents of this Privacy Policy, or wish to inform us of a change or correction to your Personal Data, would like a copy of the data we collect on you or would like to raise a complaint or comment, please contact us using the details set out below:

Email: dataprotection@wtienergy.com

Post: Wheelabrator Technologies Inc., 100 Arboretum Drive, Suite 310, Portsmouth, NH 03801, Attention: General Counsel.

11. HOW TO LODGE A COMPLAINT TO THE REGULATOR

You are entitled to lodge a complaint with our data protection regulator if you consider that we have breached your data protection rights. Our data protection regulator is the Information Commissioner's Office, which can be contacted at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

12. CHILDREN

The Site is not designed for or intended to be used by children. We do not knowingly collect Personal Data from children under the age of 13. If you are under the age of 13, please do not submit any Personal Data to us through the Site.

13. THIRD PARTY SITES

This Privacy Policy applies only to the Site. The Site may contain links to or otherwise interact with other web sites not operated or controlled by us (the "Third Party Sites"). The policies and procedures we described here do not apply to the Third Party Sites. We suggest contacting those third parties directly for information on their privacy policies.