

SERI PRIVACY POLICY

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use, and share your personal information and other data we collect from you. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

A SUMMARY OF SERI'S PRIVACY COMMITMENT

While we collect, use and are responsible for certain personal information about you, **SERI will never sell your information to third parties.** In addition, when SERI does collect personal information, we do so while mindful that the collection of such information is potentially subject to various laws in the United States and the General Data Protection Regulation which applies across the European Union (including in the United Kingdom), and that SERI may be responsible as a "controller" or "joint controller" of such personal information for the purposes of those laws, depending on the context and circumstances.

The SERI website may from time to time may post content or contain links to third-party websites that are not owned or controlled by SERI. SERI does not monitor and assumes no responsibility for the content, tracking and data gathering (which includes but is not limited to the use of cookies, flash cookies, web beacons, other data tracking devices, data gathering practices, or collection of personally identifiable information), terms and conditions, or privacy policies or practices of any third-party websites. In addition, SERI does not censor or edit the content of any third-party websites. SERI is not responsible nor liable for your use of any third-party websites accessed through the SERI website. Accordingly, SERI encourages you to be aware when you leave this website and to review the terms and conditions, privacy policies, and any other governing documents of any other website you may visit.

WHAT INFORMATION IS COVERED BY THIS POLICY?

SERI collects two overall types of data and information: 1) Certification data and information SERI may receive in the process of an organization becoming or maintaining a facility certification for a SERI electronics recycling standard ("*Certification Data*"); and 2) User data gathered from visitors to SERI's website, in registrations and purchases of training courses and other products and services, for newsletters and other communications, and other information provided to SERI in the process of entering into contracts with SERI and for the granting of license(s) for the use of SERI products and services, such as in the EULA for download of a copyrighted standard, and as the Applicant submitting a SERI License Application (collectively, "*User Data*"). Keep in mind that both Certification Data and User Data may be governed both by this Privacy Policy as well as the additional contractual terms contained in agreements entered into between you and SERI.

1. Key Terms. It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Sustainable Electronics Recycling International, a United States, District of Columbia non-profit corporation (" <i>SERI</i> ")
Data Protection Officer	SERI's Data Protection Officer ("DPO") can be reached via the contact information provided

	below.
Personal information	Any information relating to an identified or identifiable individual
R2 Standards	R2:2013, The R2 Standard by SERI Version 3 (" <i>R2v3</i> "), and other standards that may be promulgated and published by SERI
Third-party Website	Any website mentioned or directly hyperlinked to or from the SERI website that is not a property or subsidiary of SERI, including, but not limited to, websites directly linked to or from the SERI website, linked to or from content posted in the SERI Knowledge Base, or subsequent links thereto.

- 2. Personal Information We Collect About You.** We may collect and use the following personal information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household; provided that, SERI does not collect, monitor, nor is responsible for any of personal information of any kind and in any form identified and collected by Third-Party Websites, including but not limited to the following:

Categories of Personal Information	Specific Types of Personal Information Collected
Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers)	SERI collects names, email addresses, and Internet Protocol addresses
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	SERI collects telephone numbers, physical addresses, and credit card numbers (as collected by its third-party merchant processor)

<p>Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)</p>	<p>SERI collects/obtains records of intellectual property licenses purchased from SERI, training records, other services that may be purchased from SERI, and confidential records of audit reports and investigations which may include commercial information. In addition, should you participate in the Downstream Recycling Chain Registration, information about services you obtain from R2 Certified vendors, auditors, and the type of materials relevant to your downstream process, will be collected for the purpose of SERI maintaining such information in accordance with R2v3 Appendix A requirement 4(b). This information will be submitted along with your name, phone number and email address.</p>
<p>Biometric information</p>	<p>None at this time.</p>

<p>Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement)</p>	<p>Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You will be asked to consent to the use of cookies. You may refuse to accept cookies, but then you may be unable to access certain parts of our Website if the cookies are essential for you to browse the Website and use its features, such as accessing secure areas of the site. The following represents a current list of cookies in effect on the SERI website, and their duration/persistence: AWSALBCORS (7 days) and FORMASSEMBLY (end of session); _ga and _ga_E3V55VVS2N (730 days), _ga_gtag_UA_187609587_1 (1 minute), and _gid (1 day).</p> <p>Flash Cookies. Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies.</p> <p>Web Beacons. Pages of our Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).</p>
<p>Geolocation data</p>	<p>Users of the SERI Website may have geolocation data collected in order to provide location based information requested by the user, such as in order to locate the nearest certified electronics recycler in SERI’s database of facilities certified to the R2 Standards.</p>

Audio, electronic, visual, thermal, olfactory, or similar information	None at this time.
Professional or employment-related information	SERI documents training records, and confidential records of audit reports and investigations which may include professional or employment-related information.
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA)	None at this time.
Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	None at this time.

The personal information that SERI collects, as described above, is required for SERI to provide certain of its products and services to you, as such are described in this Privacy Policy. If you do not provide personal information we ask for, it may delay or prevent us from providing such products and services to you.

3. How Your Personal Information is Collected. We collect most of the personal information listed directly from you via our website and webforms linked from the website, license agreement(s) we enter into with you directly, and other agreements for products and services, such as training. SERI does not monitor and is not responsible for any personal information collected and/or processed either directly, or indirectly by any Third-party Websites linked on the SERI website. We may also collect information:

- From publicly accessible sources (e.g., property records);
- Directly from a third-party (e.g., confidential audit reports);
- From a third-party with your consent (e.g., your credit card company if you pay us by credit card);
- From cookies and other means on our website as provided above; and
- Via our IT systems, including automated monitoring of our websites and other technical systems, such as our computer networks and connections, communications systems, email and instant messaging systems. Our IT systems include third party platforms, such as

FormAssembly and Salesforce, used for the purpose of obtaining and storing data. Information on their respective privacy practices, which you consent to by submitting your data on the SERI website or in links to forms therefrom, can be obtained at <https://www.formassembly.com/privacy-policy/> and at <https://www.salesforce.com/company/privacy/>.

4. How and Why We Use Your Personal Information. Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.,:

- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- For our legitimate interests or those of a third-party; or
- Where you have given consent, such as by participation in the R2 Certification program and/or the Downstream Recycling Chain Registration referenced above.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

In most instances, the provision of such personal information is not requested or required by SERI, and is instead provided incidentally or at the choice of the party providing such information in addition to the non-identifiable information SERI has requested. In other instances, the provision of such personal information is simply for the identification of the party with whom SERI is entering into a contract, and the person providing such information is aware of the purpose of the contract. Further, from time-to-time SERI will publish links to Third-party Websites, and SERI’s website may be linked to or from Third-party Websites. Any information collected and/or processed from those websites do not fall under this Privacy Policy. SERI does not monitor nor is responsible for the processing of personal information by these Third-party Websites. **The table below explains what we use (process) your personal information for and our reasons for doing so:**

What we use your personal information for	Our reasons
To provide the R2 Standards, and other products and services to you, including maintenance of the Downstream Recycling Chain Registration	For the performance of our contract(s) with you or to take steps at your request before entering into a contract, such as license agreements for a facility’s use of certification marks related to the R2 Standards (such as R2:2013 and R2v3), any copyright license agreements for the downloading of R2 Standards from the SERI website, training related to the R2 Standards, or otherwise.
To prevent and detect fraud against you or SERI	For our legitimate interests or those of a third-party, i.e. to minimize fraud that could be damaging for us and for you

<p>Conducting checks to identify our customers and verify their identity</p> <p>Screening for financial and other sanctions or embargoes</p> <p>Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator</p>	<p>To comply with our legal and regulatory obligations, as well as those in the R2 Standards</p>
<p>Gathering and providing information required by or relating to audits, enquiries or investigations by certification bodies and regulatory bodies</p>	<p>To comply with our legal and regulatory obligations, as well as those in the R2 Standards. Your Certification Body (“CB”) may provide audit reports and records upon request as part of SERI’s quality control and assurance processes related to the certification programs for the R2 Standards. While SERI does not determine the purpose and means of the CB’s processing of data you provide to your CB, SERI nevertheless enters into Joint Controller agreements with its authorized Certification Bodies in furtherance of and to support principles of transparency with all involved, and to encourage the appropriate treatment of private data that may be incidentally gathered by those Certification Bodies auditing to the R2 Standards. SERI requires authorized CB’s to enter into agreements with each of the CB’s customers for which it provides services related to the R2 Standards providing information regarding the CB’s collection and use of data, as well as provisions regarding the CB and SERI’s respective obligations with respect to their status as potential Joint Controllers.</p>
<p>Ensuring business policies are adhered to, e.g. policies covering security and internet use</p>	<p>For our legitimate interests or those of a third-party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you</p>
<p>Operational reasons, such as improving efficiency, training and quality control</p>	<p>For our legitimate interests or those of a third-party, i.e. review your records to identify potential quality issues related to an audit program</p>

<p>Ensuring the confidentiality of commercially sensitive information</p>	<p>For our legitimate interests or those of a third-party, i.e. to protect trade secrets and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations, as well as those in the R2 Standards</p>
<p>Statistical analysis to help us manage our business, e.g. in relation to performance, subscriber/licensee base, product range or other efficiency measures</p>	<p>For our legitimate interests or those of a third-party</p>
<p>Preventing unauthorized access and modifications to systems</p>	<p>For our legitimate interests or those of a third-party, i.e. to prevent and detect criminal activity that could be damaging for us and for you</p> <p>To comply with our legal and regulatory obligations, as well as those in the R2 Standards</p>
<p>Updating and enhancing licensee and other customer records</p>	<p>For the performance of our contract(s) with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations, as well as those of the R2 Standards</p> <p>For our legitimate interests or those of a third-party, e.g. making sure that we can keep in touch with our subscribers and licensee(s) about existing certifications, industry updates and news, and new products and services</p>
<p>Marketing our services and those of selected third parties to:</p> <ul style="list-style-type: none"> — existing and former subscribers and licensees; — third parties who have previously expressed an interest in our services; — third parties with whom we have had no previous dealings. 	<p>For our legitimate interests or those of a third-party, i.e. to promote the R2 Standards to existing and former subscribers and licensees</p>
<p>External audits, investigations, and quality checks</p>	<p>For our legitimate interests or a those of a third-party, i.e. to maintain certifications in accordance with the R2 Standards</p> <p>To comply with our legal and regulatory obligations, as well as those of the R2 Standards</p>

The above table does not apply to special category personal information, which we will only process with your explicit consent.

- 5. Promotional Communications.** We may use your personal information to send you updates by email, text message, telephone or post about the R2 Standards, and other SERI products services, including offers, promotions or new products and services.

We have a legitimate interest in processing your personal information for promotional purposes (see above “How and why we use your personal information”). This means while we do not usually need your consent to send you promotional communications, where consent is needed, we will ask for this consent separately and clearly. SERI does not monitor and is not responsible, per the terms and conditions found in the SERI Terms of Service, for the promotional communications and/or promotional communication policies of any third-party websites that may be linked to the SERI website. Accordingly, SERI encourages you to be aware when you leave this website and to review the terms and conditions, privacy policies, and any other governing documents of each other website you may visit.

We will always treat your personal information with the utmost respect and never sell or share it with other organizations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- Contacting us at admin@sustainableelectronics.org; or
- Using the “unsubscribe” link in emails or “STOP” number in texts.

We may ask you to confirm or update your marketing preferences if you instruct us to provide R2 Standards updates, newsletters, products and/or in the future, or if there are changes in the law, regulation, or the structure of our business.

- 6. Who We Share Your Personal Information With.** We routinely share personal information with:

- Service providers we use to help deliver our products and/or services to you, such as payment service providers, warehouses and delivery companies, and contractors engaged by SERI to support SERI’s operations who have a “need to know” in order to perform such services and who are bound by confidentiality agreement(s) with SERI. Further information may be available upon written request.
- Other third parties we use to help us run our business, such as marketing agencies or website hosts, data storage providers, cloud IT services and SaaS providers, and online training platforms, including, but not limited to, [Authorize.net](https://www.authorize.net/), [Constant Contact](https://www.constantcontact.com/), [WordPress](https://www.wordpress.com/), [SalesForce](https://www.salesforce.com/), [Microsoft](https://www.microsoft.com/), [Bluehost.com](https://www.bluehost.com/), FormAssembly.com;
- Third parties approved by you, including those designated via the dispute resolution processes of license agreement(s) and other contracts with you, as well as third-party payment providers;
- Certification bodies selected by you for certification to the R2 Standards, and their individual auditors.
- Information about R2 Certified companies (which may or may not include Personal Information depending on the nature and circumstances of a particular facility’s registration and contact information) is listed on the SERI website as a way to inform the public, and is

also disclosed via programmatic access to the same information through an API licensed for use by third parties to display the status of R2 Certified facilities.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. You can click on the links provided above to learn more about how the listed service providers deal with privacy concerns.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations, as well as to the extent provided in any separate agreement(s) between you and SERI.

We may also need to share some personal information with other parties with a bona fide need to know in order to accomplish a business transaction that does not exploit or sell the consumer's information, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by enforceable confidentiality obligations preserving the privacy of such information as provided herein.

Except as described above, we will not share your personal information with any other third-party. Further, SERI does not monitor nor is responsible, per the terms and conditions in the SERI Terms of Service, for any personal information collected and shared by Third-party Websites that may be linked to the SERI website. Accordingly, SERI encourages you to be aware when you leave this website and to review the terms and conditions, privacy policies, and any other governing documents of each other website you may visit.

- 7. Where Your Personal Information is Held.** Information may be held at our offices and those of our service providers, representatives and agents as described above (see above: "Who We Share Your Personal Information with").

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: "Transferring Your Personal Information Out of the EEA".

- 8. How Long Your Personal Information Will Be Kept.** We will keep your personal information while you are certified to one or more of the R2 Standards, are a party to a contract with SERI, have an online account or any type of active license with SERI, or while we are providing products and/or services to you (such as newsletters and other information you have requested). Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly and complied with the R2 Standards; or
- To keep records required by law.
- To prevent fraud or other deceptive practices related to R2 certification

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

When it is no longer necessary to retain your personal information, we will delete or anonymize it.

SERI does not monitor nor is responsible, per the terms and conditions in the SERI Terms of Service, for the duration which third-party websites that may be linked to the SERI website retain your personal information. Accordingly, SERI encourages you to be aware when you leave this website and to review the terms and conditions, privacy policies, and any other governing documents of each other website you may visit.

9. Transferring Your Personal Information Out of the EEA. To deliver services to you and perform obligations related to the R2 Standards, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), e.g.:

- With your and our service providers located outside the EEA, including SERI contractors as provided herein, and to your own Certification Bodies;
- If you are based or have locations and personnel outside the EEA; or
- Where there is another international dimension to the services we are providing, such as while following up as necessary for compliance with the R2 Standards.

These transfers are subject to special rules under European and UK data protection law.

The following countries to which we may transfer personal information have been assessed by the European Commission as providing an adequate level of protection for personal information: Canada.

For any non-EEA countries that do not have the same data protection laws as the United Kingdom and EEA we will take steps to ensure the transfer complies with applicable data protection law and all personal information will be secure. SERI further believes its collection and use of personal information as described in this Privacy Policy is only that which would constitute an “occasional” transfer of information necessary for the performance of a contract, under GDPR Article 49 (derogation), and not for any other purpose associated with the further use or processing of such data. Nevertheless, SERI advises you to seek legal counsel of your own choice regarding the possible risks of data transfer to the United States of America given the recent determination by the European Commission of inadequate governmental safeguards. You should take the time to carefully review SERI’s Privacy Policy, including the description of the additional and specific safeguards utilized by SERI, as well as the non-judicial third-party mechanisms for dispute resolution used by SERI contract(s) to which you may be a party with SERI, to determine on a case-by-case basis whether they are adequate for you and the type of data you will provide, after considering all of the above.

10. Your Rights Under the GDPR.

Right to Access	The right to be provided with a copy of your personal information (the right of access)
Right to Rectification	The right to require us to correct any mistakes in your personal information
Right to be Forgotten	The right to require us to delete your personal information—in certain situations
Right to Restriction of Processing	The right to require us to restrict processing of

	your personal information—in certain circumstances, e.g. if you contest the accuracy of the data
Right to Data Portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third-party—in certain situations
Right to Object	The right to object: <ul style="list-style-type: none"> — at any time to your personal information being processed for direct marketing (including profiling); — in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.
Right Not to be Subject to Automated Individual Decision-Making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, see the [guidance](#) from the UK Information Commissioner's Office (ICO) on individual rights under the General Data Protection Regulation.

11. Keeping Your Personal Information Secure. We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need in furtherance of the purposes provided herein to access it. While personal information is not encrypted at rest, it is encrypted during transmission through HTTPS secure socket layer protocols. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so. SERI regularly tests, assesses, and evaluates the effectiveness of its technical and organizational measures for ensuring the security of its processing of data. SERI practices both “Privacy by Design” and “Data Minimization,” meaning any processes or services for which your personal information are necessary are engineered and designed by SERI to require the least amount of personal information (if any), and that SERI does not retain your personal information for any longer than necessary to accomplish the associated purpose(s). You may request further details and information regarding SERI security measures by contacting us at the information provided below.

SERI does not monitor nor is responsible, per the terms and conditions in the SERI Terms of Service, for the security policies, procedures, and protocols of any Third-party Websites that may be linked to the SERI website. Accordingly, SERI encourages you to be aware when you leave this website and to review the terms and conditions, privacy policies, and any other governing documents of each other website you may visit.

12. Disclaimer Regarding Appendix A, R2v3. Appendix A, Section 4(b) of the R2v3 Reuse and Recycling (R2) Standard provides that an R2 Facility shall register with SERI the portion of the downstream recycling chain that it manages, including all R2 Controlled Streams to final disposition or the first R2 Facility, to enable mapping of the entire chain, and register any changes prior to shipment. Any information provided to SERI for this purpose is solely for the purpose of SERI's interim centralized hosting of such information to carry out this provision of R2v3, and is not processed by SERI for any other purpose. SERI disclaims all warranties as to the verification or validity of the registered information and registration of the required information should not be considered a verification to the validity or veracity of the information by SERI. The collection of the required data and any personal information that may comprise that collected data fall under the categories listed in Section 2, and the reasons for processing provided in Section 4.

13. How to Exercise Your Rights. If you would like to exercise any of your rights as described in this Privacy Policy, please:

- Call us at +00 1 (202) 921 2260; or
- Email/write to us at admin@sustainableelectronics.org or PO Box 721 – Hastings, MN 55033 (USA)

When contacting us, please provide us with:

- Enough information to identify you (e.g., your full name and address);
- Secure proof of your identity and address (e.g., an encrypted copy of your driving license or passport and a recent utility or credit card bill); and
- A description of what right you want to exercise and the information to which your request relates.

We are not obligated to act on your request if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person's behalf. For your own security, we will investigate your identity before providing any information.

Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

In the instance of information that may have been provided to your CB and further provided to SERI as well, you may also contact your CB.

SERI is not responsible for complaints originating from third-party websites that may be linked to the SERI website. Therefore, any complaint regarding a third-party website that may be linked to the SERI website must be directed to the administrators of that third-party website.

14. How to File a GDPR Complaint. We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws occurred.

15. Changes to This Privacy Notice. This privacy notice was published on October 30, 2021.

We may change this privacy notice from time to time—when we do, we will inform you via our website or other means of contact such as email.

16. How to Contact Us. Please contact our Data Protection Officer by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

SERI Data Protection Officer Contact Details:
PO Box 721 Hastings, MN 55033 (USA)
admin@sustainableelectronics.org
+00 1 (202) 921 2260

17. Do You Need Extra Help? If you would like this notice in another format (for example: audio, large print, braille) please contact us (see “How to contact us” above).