

Privacy Policy – TRACE

1. Introduction

Corp Colab Limited (“CorpColab”, “we”, “our”, “us”) is committed to protecting and respecting your privacy.

This Privacy Policy explains how we collect, use, store, disclose and protect personal data when you:

- Visit our website
- Use the TRACE platform
- Register for demos, updates or marketing communications
- Contact us regarding our services
- Engage with us as a customer, supplier or business partner

TRACE is an enterprise Software-as-a-Service (SaaS) platform designed for waste management, ESG reporting, operational visibility and supply chain compliance.

We process personal data in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)
- Any other applicable data protection laws

2. Who We Are

Data Controller: CorpColab Limited

Company Registration Number: 14169374

Registered Office: 7 Canute House, Durham Wharf Dr, Brentford TW8 8HP

Website: <https://www.corpcolab.com/>

TRACE Platform: <https://www.corpcolab.com/trace>

Email: trace@corpcolab.com

If required, you may contact our Data Protection Lead using the details above.

2. Personal Data We Collect

We may collect, store and process the following categories of personal data:

A. Identity Data

- Full name
- Job title
- Employer / organisation name
- Username or account ID

B. Contact Data

- Email address
- Telephone number
- Business address
- Billing contact details

C. Technical Data

- IP address
- Browser type and version
- Device identifiers
- Time zone setting
- Operating system
- Login timestamps
- Platform access logs

D. Usage Data

- Pages viewed
- Features used
- Clickstream behaviour
- Session duration
- Aggregated date
- Usage data
- Interaction history within TRACE

E. Commercial Data

- Subscription records
- Contract history
- Support requests
- Product enquiries

F. Operational Data Submitted by Customers

TRACE may process operational data uploaded by customers, including (but not limited to):

- Company and legal entity
- Digitised intercompany contracts
- Waste movement records
- Waste materials
- Waste processing
- Waste processing outcomes
- Facility information
- Chain of custody records
- QR scan events
- Driver or operator names
- Site contacts
- Compliance evidence
- ESG reporting data

Where such data contains personal data, we process it under customer digital instructions.

4. How We Collect Data

We collect data through:

- Website forms
- Demo requests
- Landing page registrations
- Customer onboarding
- Direct correspondence
- Telephone calls
- Support tickets
- Cookies and analytics tools
- Usage of platforms provided

- Platform usage logs
- API integrations authorised by customers

5. How We Use Your Data

We use personal data to:

Service Delivery

- Create and manage user accounts
- Provide access to TRACE
- Authenticate users
- Deliver platform functionality
- Process subscriptions and billing

Waste & ESG Platform Functions

- Track chain of custody events
- Validate handoffs and receipts
- Support waste reporting workflows
- Generate dashboards and ESG insights
- Produce compliance evidence

Communications

- Respond to enquiries
- Deliver service notices
- Provide customer support
- Send relevant product updates

Security & Operations

- Detect fraud or misuse
- Maintain platform security
- Troubleshoot incidents
- Improve reliability and performance

Business Improvement

- Analyse trends
- Improve user experience
- Develop new features
- Measure campaign performance

Legal & Regulatory

- Meet legal obligations
- Respond to lawful requests
- Maintain records for audits

6. Legal Basis for Processing

Under UK GDPR, our lawful bases include:

Contract

Where processing is necessary to provide services to you or your organisation.

Legitimate Interests

Including:

- Operating and improving TRACE
- Maintaining TRACE functionality

- Supporting wider TRACE ecosystem features
- Providing resilience of service
- Protecting systems and users
- Managing customer relationships
- Business development

We balance these interests against your privacy rights.

Legal Obligation

Where required to comply with laws, regulations or lawful authority requests.

Consent

Where required, such as certain marketing communications or non-essential cookies.

You may withdraw consent at any time, as under the standard Terms and Conditions of TRACE.

7. Cookies and Tracking Technologies

We use cookies and similar technologies.

Essential Cookies

Used for:

- Login sessions
- Security
- Load balancing
- Core website functionality

Analytics Cookies

Used to understand:

- Visitor traffic
- Page performance
- Content engagement

Preference Cookies

Used to remember settings and improve experience.

Where legally required, we request consent before placing non-essential cookies.

You may manage cookies through your browser settings.

8. Marketing Communications

We may contact business users regarding:

- TRACE updates
- Events
- Relevant insights
- Product launches
- Service information

You may unsubscribe at any time using the link in communications or by contacting us.

10. International Transfers

Where personal data is transferred outside the UK, we ensure appropriate safeguards are in place, including:

- UK International Data Transfer Agreement (IDTA)
- UK Addendum to EU SCCs

- Adequacy regulations
- Equivalent lawful safeguards

11. Data Security

We implement appropriate technical and organisational security measures, including:

- Access controls
- Encryption in transit where appropriate
- Secure hosting environments
- Role-based permissions
- Monitoring and logging
- Backup and recovery processes
- Staff confidentiality obligations

No internet transmission is completely secure, but we take reasonable steps to protect your data.

12. Personal Data Retention

We retain personal data only as long as necessary for the purposes collected.

Retention periods may depend on:

- Contract duration
- Customer instructions
- Legal obligations
- Accounting requirements
- Security investigations
- Audit and reporting needs

Operational waste tracking records may be retained longer where required for compliance, service integrity or contractual audit trails.

Corp Colab reserves the right to deletion, redaction, obfuscation or other mechanisms to comply with legal and regulatory requirements and retain the integrity of the TRACE platform and community.

13. Your Rights

Subject to applicable law, you may have rights to your personal data:

- Access your personal data
- Correct inaccurate data
- Request erasure
- Restrict processing
- Object to processing
- Request portability
- Withdraw consent
- Lodge a complaint

To exercise rights, contact us using the details below.

We may request identity verification before responding.

14. Complaints

If you are unhappy with how we handle personal data, please contact us first.

You may also complain to the UK Information Commissioner's Office (ICO):

Website: <https://ico.org.uk/>

15. Third-Party Websites

Our website may contain links to third-party websites. We are not responsible for their privacy practices. Please review their policies separately.

16. Customer Data / Processor Role

Where TRACE processes data uploaded by customers on their behalf, CorpColab may act as a **data processor** and the customer remains the **data controller**.

In such cases, processing is governed by customer contracts and data processing agreements.

17. Children

TRACE is a business platform and not intended for children. We do not knowingly collect children's personal data.

18. Changes to This Policy

We may update this Privacy Policy periodically.

Any changes will be posted on our website with an updated effective date.

19. Contact Us

For privacy enquiries, rights requests or data concerns:

CorpColab Limited

Canute House, 7 Durham Wharf Dr, Brentford TW8 8HP

info@corpcolab.com

<https://www.corpcolab.com/>

20. Practical Summary

We use personal data responsibly to operate TRACE, deliver services, improve performance and support compliant, secure waste and ESG data management.