

# NOWOS

## Respecting privacy and protecting personal data

At Nowos, we envision a global economy that uses business as a force of good. This economy is comprised of a new type of corporation, which is purpose-driven and creates benefit for all stakeholders. We aim to not only reclaim raw materials from Lithium-Ion batteries, but to reclaim them in a way that has a positive effect on our planet, people and profit. We aim to add value by treating used Lithium Ion batteries not as waste, but as a valuable material for re-creation:

- We believe you should actually get paid for your used products! Recycling should be cheaper than digging materials from the ground.
- Moreover, we believe the process of reclaiming raw materials should have no additional negative side effects on the planet and people, giving our earth and population a chance to regenerate!

This asks of our partners and us to co-create a radically different process of reclaiming raw materials: more efficient, better in quality, with less negative side effects. This people oriented, environmental approach is also expressed in the company name: 'NOWOS', meaning *a new common spirit, living again*<sup>1</sup>.

Our core activities include:

1. Recycling of useful materials from urban waste (Urban Mining) and the facilitation of end-to-end circular and logistic processes in the field of Lithium Ion batteries (Reversed logistics);
2. Providing advice and services with regard to all aspects of safe handling, legal rules and administration in relation to Lithium Ion and all other (logistic) processes concerning battery waste.

## Data, people and society

Through everyday choices about the use of our electronic waste, Nowos continuously invests in a fairer, greener and more human economy and society. Waste can help change the world; data can as well. Data can be used to better understand our world and each other. This understanding can be used to prevent waste, to reduce costs and create societal benefits. For instance, by analysing sales data, weather forecasts and seasonal trends, manufacturers can determine an optimum inventory level, avoiding overstock and thereby reducing the effects of food wastage. Or data related to a person (personal data) may be used for personalised medicine, providing more effective and targeted treatment of diseases with less side effects and reduced costs. At the same time, Nowos must also be cognisant of the fact that while the use of data may have positive impact on our lives, misuse or abuse may also negatively impact us.

## Data at Nowos

Data helps Nowos to become a better organization by improving service offerings and operations. Data assists Nowos to discover areas for approval, assess risk and enhance the reliability of our services. These insights help to improve products and tailor services to improve people's quality of life. Nowos is aware of the fact that the (personal) data it processes can be sensitive and can impact the privacy of our clients and co-workers. As such, Nowos is committed to respecting privacy and ensuring data protection.

---

<sup>1</sup> "Nous" meaning "spirit" in Greek and "we" in French: our common spirit, we are in this together.

# NOWOS

## Position on the use of data, privacy and data protection

When it comes to privacy and data protection, Nowos believes:

- that data is an abstraction, reduction of reality and an interpretation of behaviour. The world cannot be captured in abstractions. People should not be reduced to the data collected about them. Data refers to the past and are not always a prediction for the future.
- that every individual has the right to be different in different situations, in other roles or at different times.
- that each individual should keep the power and control over her or his own life, including personal data. This calls for freedom of choice, fairness and transparency on data collection, processing and usage.
- that data are valuable, therefore Nowos has an obligation to keep the data when holding them accurate, secure and confidential.

## Guiding principles

Responsible use of personal data in line with the above beliefs, requires conscious decision-making. In our decision-making on the use of personal data Nowos is therefore always guided by the following principles

### 1. Legal and regulatory compliance

In line with applicable laws and regulations (e.g. GDPR as a whole, and specifically art 5 and 6), processing of personal data must be fair, legitimate and transparent. Furthermore, data needs to be kept secure and accurate and the rights of the data subjects needs to be respected (access, portability, deletion etc.). Finally, Nowos is responsible for its use of personal data.

### 2. Positive Sum

The interests of using personal data and respect for privacy should not be mutually exclusive. We strive to optimise both values. Benefits should also go to the individual and society, rather than just the organization.

### 3. Respect for human dignity and individuality

Nowos values and considers the human scale, also when it comes to respecting privacy and data protection. An individual is not to be solely judged upon his/her data shadow.

### 4. Transparency and openness

Nowos is open about its use of personal data. Activities, products and transactions of Nowos are reasonably explainable to our clients, co-workers, data protection authorities and the general public (e.g. GDPR art 12, 13 and 14). Nowos clearly, transparently and actively communicates its position on privacy and data protection. Furthermore, Nowos provides actionable insight into the use and protection of personal data to our clients to avoid surprises.

### 5. Personal autonomy

Nowos provides meaningful choice. Where processing of personal data is based on consent, the choice is free, informed, specific and an unambiguous indication of wishes. Nowos facilitates the exercise of an individual's rights and preferences when it comes to personal data (e.g. GDPR art 15) and provides users with control over their personal data through measures such as privacy settings. (e.g. GDPR art 12 and 25).

### 6. Context sensitivity

Privacy and personal data are context specific. Data used outside of the context in which they were collected or shared can lead to surprises and even harm. Nowos is mindful of the specific context in which data were collected and will process the data only for these and compatible purposes (e.g. GDPR art 5.1.b and 6.2). Context specificity guides our thinking on the (future) use of data.

Nowos, January 2019