



Privacy policy—ES Global Ltd



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

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR). We are also subject to the EU General Data Protection Regulation (EU GDPR) in relation to goods and services we offer to individuals and our wider operations in the European Economic Area (EEA).

Key terms

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

We, us, our	ES Global Ltd (CRN: 08305723) whose registered address is at Unit G East, Coate House, 1-3 Coate Street, London, E2 9AG and our ESG group.
Our data protection officer	Dani Gubbay, HR Director, ES Global Ltd. +44 (0) 2070557200
Our website	https://www.esglobalsolutions.com/
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data (when processed to uniquely identify an individual) Data concerning health, sex life or sexual orientation
Data subject	The individual who the personal data relates to



Personal data we collect about you

We may collect and use the following personal data about you:

- your name and contact information, including email address and telephone number and company details
- information to check and verify your identity, eg your date of birth, nationality, etc
- location data,
- your billing information, transaction and payment card information
- your professional interests
- your professional online presence, eg LinkedIn profile
- information to enable us to undertake credit or other financial checks on you
- your responses to surveys, competitions and promotions

We collect and use this personal data to provide services to you or to work with you. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

How your personal data is collected

We collect most of this personal data directly from you—in person, by telephone, text or email and/or via our websites. However, we may also collect information:

- from publicly accessible sources (eg Companies House, your company website, or HM Land Registry);
- directly from a third party, eg:
 - sanctions screening providers;
 - credit reference agencies;
 - customer due diligence providers;
 - sub-contractors;
 - suppliers;
- from a third party with your consent, (eg *your bank or your employer*)



- via our IT systems.

How and why we use your personal data

When we use your personal information we are required to have a legal basis for doing so. There are various different legal bases on which we may rely, depending on what personal information we process and why.

The legal bases we may rely on include:

- **consent:** where you have given us clear consent for us to process your personal information for a specific purpose
- **contract:** where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract
- **legal obligation:** where our use of your personal information is necessary for us to comply with the law (not including contractual obligations)
- **legitimate interests:** where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests)

The table below explains what we use your personal data for and why.

What we use your personal data for	What information we ask for	Our legal bases
Providing services to you	<ul style="list-style-type: none">• Full Name• Location• Contact details• Email address• Job title• Bank details/payment information	CONTRACT - to perform our contract with you or to take steps at your request before entering into a contract.

What we use your personal data for	What information we ask for	Our legal bases
Working with you (eg sub-contractors and suppliers)	<ul style="list-style-type: none"> • Full Name • Location • Contact details • Email address • Job title • Emergency contact details • Dependent contract • Bank details /payment information 	CONTRACT - to perform our contract with you or to take steps at your request before entering into a contract.
Preventing and detecting fraud against you or us	<ul style="list-style-type: none"> • Full Name • Location • DOB • Contact details 	LEGITIMATE INTEREST - to minimise fraud that could be damaging for you and/or us.
<p>Conducting checks to identify our clients/sub-contractors/suppliers and verify their identity</p> <p>Screening for financial and other sanctions or embargoes</p> <p>Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, eg under health and safety law or</p>	<ul style="list-style-type: none"> • Full Name • Location • Contact details • Financial details 	LEGAL OBLIGATION - to comply with our legal and regulatory obligations.

What we use your personal data for	What information we ask for	Our legal bases
rules issued by our professional regulator.		
<p>Ensuring business policies are adhered to, eg policies covering security.</p> <p>Ensuring safe working practices, staff administration and assessments.</p>	<ul style="list-style-type: none"> • Full Name • Location • Contact details 	<p>LEGITIMATE INTEREST - to make sure we are following our own internal procedures so we can deliver the best service to you.</p> <p>LEGAL OBLIGATION - to comply with our legal and regulatory obligations.</p>
Operational reasons, such as improving efficiency, training and quality control	<ul style="list-style-type: none"> • Full Name • Location • Contact details • Email address • IP address • Usage 	<p>LEGITIMATE INTEREST - to be as efficient as we can so we can deliver the best service to you at the best price</p>
Ensuring the confidentiality of commercially sensitive information.	<ul style="list-style-type: none"> • Full Name • Location • Contact details • Job title 	<p>CONTRACT - to perform our contract with you or to take steps at your request before entering into a contract.</p> <p>LEGAL OBLIGATION - to comply with our legal and regulatory obligations</p> <p>LEGITIMATE INTEREST - to protect trade secrets and</p>

What we use your personal data for	What information we ask for	Our legal bases
		other commercially valuable information.
Statistical analysis to help us manage our business, eg in relation to our financial performance, customer base, product range or other efficiency measures	<ul style="list-style-type: none"> • Full Name • Location • Contact details • Email address • Usage 	LEGITIMATE INTEREST - to be as efficient as we can so we can deliver the best service to you at the best price.
Preventing unauthorised access and modifications to systems	<ul style="list-style-type: none"> • Full Name • Location • DOB • Job title • Contact details • ID number • Email address 	<p>LEGITIMATE INTEREST - to prevent and detect criminal activity that could be damaging for you and/or us.</p> <p>LEGAL OBLIGATION - to comply with our legal and regulatory obligations.</p>
Updating customer records	<ul style="list-style-type: none"> • Full Name • Location • Job title • Contact details • Email address 	<p>CONTRACT - to perform our contract with you or to take steps at your request before entering into a contract.</p> <p>LEGAL OBLIGATION - to comply with our legal and regulatory obligations.</p> <p>LEGITIMATE INTEREST – to make sure that we can</p>

What we use your personal data for	What information we ask for	Our legal bases
		keep in touch with our customers about existing orders and new products
Marketing our services to: —existing and former customers; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	<ul style="list-style-type: none"> • Full Name • Location • Job title • Contact details • Email address 	LEGITIMATE INTEREST – to promote our business to existing and former customers
Credit reference checks via external credit reference agencies	<ul style="list-style-type: none"> • Full Name • Contact details • Financial information 	LEGITIMATE INTEREST – to ensure our clients are likely to be able to pay for our products and services.
External audits and quality checks, eg for ISO or Investors in People accreditation and the audit of our accounts	All data collected which is necessary to perform the obligation.	LEGITIMATE INTEREST – to maintain our accreditations so we can demonstrate we operate at the highest standards. LEGAL OBLIGATION - to comply with our legal and regulatory obligations.

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, eg:

- we have your explicit consent;



- the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent; or
- the processing is necessary to establish, exercise or defend legal claims.

Marketing

We may use your personal data to send you updates (by email, text message, telephone or post) about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in using your personal data for marketing purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you marketing information. However, where consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by contacting us at ES Global Ltd. - Sara Roberts, Marketing Manager, +44 (0) 2070557200.

We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell it with other organisations for marketing purposes.

Who we share your personal data with

We routinely share personal data with:

- companies within the ESG group
- third parties we use to help deliver our services to you, (eg payment service providers, warehouses and delivery companies, sub-contractors, suppliers));
- other third parties we use to help us run our business, (eg marketing agencies or website hosts);
- credit reference agencies;
- our insurers and brokers;
- our banks;



We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

We may also need to:

- share personal data with external auditors, eg in relation to ISO accreditation and the audit of our accounts;
- disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations;
- share some personal data with other parties, such as potential buyers of some or all of our business or during a restructuring—usually, information will be anonymised but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations.

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

Where your personal data is held

Personal data may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see above: '**Who we share your personal data with**').

Some of our group companies and third parties may be based outside the UK/EEA. For more information, including on how we safeguard your personal data when this happens, see below: '**Transferring your personal data out of the UK and EEA**'.

How long your personal data will be kept

We will keep your personal data while you have an account with us or we are providing services to you. Thereafter, we will keep your personal data 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;
- to keep records required by law.

We will not keep your personal data for longer than necessary. Different retention periods apply for different types of personal data.



When it is no longer necessary to keep your personal data, we will delete or anonymise it.

Transferring your personal data out of the UK and EEA

To deliver services to you, it is sometimes necessary for us to share your personal data outside the UK/EEA, eg:

- with our offices or other companies within our group located outside the UK/EEA;
- with your and our service providers located outside the UK/EEA;
- if you are based outside the UK/EEA;
- where there is a European and/or international dimension to the services we are providing to you.

Under data protection law, we can only transfer your personal data to a country or international organisation outside the UK/EEA where:

- the UK government or, where the EU GDPR applies, the European Commission has decided the particular country or international organisation ensures an adequate level of protection of personal data (known as an 'adequacy decision');
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects; or
- a specific exception applies under data protection law.

These are explained below.

Adequacy decision

We may transfer your personal data to certain countries, on the basis of an adequacy decision. These include:

- all European Union countries, plus Iceland, Liechtenstein and Norway (collectively known as the 'EEA');
- Gibraltar; and
- Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Switzerland and Uruguay.



The list of countries that benefit from adequacy decisions will change from time to time. We will always seek to rely on an adequacy decision, where one exists.

Other countries or international organisations we are likely to transfer personal data to do not have the benefit of an adequacy decision. This does not necessarily mean they provide poor protection for personal data, but we must look at alternative grounds for transferring the personal data, such as ensuring appropriate safeguards are in place or relying on an exception, as explained below.

Transfers with appropriate safeguards

Where there is no adequacy decision, we may transfer your personal data to another country or international organisation if we are satisfied the transfer complies with data protection law, appropriate safeguards are in place, and enforceable rights and effective legal remedies are available for data subjects.

In relation to transfers to our overseas offices or other companies within our group, the safeguards may instead include legally binding rules and policies that apply to ESG group (known as binding corporate rules), which have been approved by the UK data protection regulator.

To obtain a copy of the standard data protection contract clauses and further information about relevant safeguards, please contact us (see '**How to contact us**' below).

Transfers under an exception

In the absence of an adequacy decision or appropriate safeguards, we may transfer personal data to a third country or international organisation where an exception applies under relevant data protection law, eg:

- you have explicitly consented to the proposed transfer after having been informed of the possible risks;
- the transfer is necessary for the performance of a contract between us or to take pre-contract measures at your request;
- the transfer is necessary for a contract in your interests, between us and another person; or
- the transfer is necessary to establish, exercise or defend legal claims

We may also transfer information for the purpose of our compelling legitimate interests, so long as those interests are not overridden by your interests, rights and freedoms. Specific conditions apply to such transfers and we will provide relevant information if and when we seek to transfer your personal data on this ground.



Further information

If you would like further information about data transferred outside the UK/EEA, please contact **our** Data Protection Officer (see '**How to contact us**' below).

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal data 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
To object	The right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests.
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
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For further information on each of those rights, including the circumstances in which they apply, please contact us (see '**How to contact us**' below) or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights](#).

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: '**How to contact us**'; and
- provide enough information to identify yourself (eg your full name, address and customer or matter reference number) and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised 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.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

Please contact us if you have any query or concern about our use of your information (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner. The Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.



Changes to this privacy policy

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.

How to contact us

Individuals in the UK

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please send an email to danig@esglobalsolutions.com or call at +44 (0) 2070557200.

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).