



Privacy Policy

Document Control

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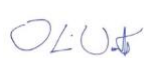
Revision History

Stage	Revision	Date	Status	Description	Author
Draft	P01	04/01/2022	Draft	For Approval	ES Global
Draft	P02	01/08/2022	Draft	For Approval	ES Global

Reviewer List

Name	Role	Organisation
Suzanne Hogan	Head Of HR	ES Global

Approvals

Name	Signature	Title	Date	Version
Olly Watts		Chief Executive Officer	01/08/2022	P02

Statement of Intent

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	Suzanne Hogan, Head of HR, 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	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.
Working with you (eg sub-contractors and suppliers)	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	Full Name Location DOB Contact details	LEGITIMATE INTEREST - to minimise fraud that could be damaging for you and/or us.
Conducting checks to identify our clients/sub-contractors/suppliers and verify their identity Screening for financial and other sanctions or embargoes	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
Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, eg under health and safety law or 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>	<p>Full Name Location Contact details</p>	<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	<p>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
Ensuring the confidentiality of commercially sensitive information.	<p>Full Name Location Contact details Job title</p>	<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 other commercially valuable information.</p>
Statistical analysis to help us manage our business, eg in relation to our financial performance, customer base, product range or other efficiency measures	<p>Full Name Location Contact details Email 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.

What we use your personal data for	What information we ask for	Our legal bases
Preventing unauthorised access and modifications to systems	Full Name Location DOB Job title Contact details ID number Email address	LEGITIMATE INTEREST - to prevent and detect criminal activity that could be damaging for you and/or us. LEGAL OBLIGATION - to comply with our legal and regulatory obligations.
Updating customer records	Full Name Location Job title Contact details Email address	CONTRACT - to perform our contract with you or to take steps at your request before entering into a contract. LEGAL OBLIGATION - to comply with our legal and regulatory obligations. LEGITIMATE INTEREST - to make sure that we can 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.	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	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, Head of Marketing, +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.