

Date	Name	Role	Change	Version
Tue Jul 22 2025	Tim Murnaghan	CTO	Approved	V1.0

Data and Privacy Policy

1. General

We are committed to safeguarding the privacy of our website visitors, service users, individual customers and customer personnel.

2. Role and responsibilities

Responsibility to follow this policy applies to all Integrum ESG employees by reading and following the policy prescriptions. The Data Protection Officer (DPO) is responsible for developing, maintaining, and implementing the Data and Privacy Policy.

3. Purpose and scope

This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.

Integrum ESG Limited is registered with the Information Commissioner's Office (ICO), the UK's data protection regulator. We pay an annual data protection fee to the ICO. This is public information and can be verified at the Data Protection public register.

We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website. We do not use non-essential cookies in the delivery of our dashboard.

In this policy, "we", "us" and "our" refer to Integrum ESG Ltd.

4. The personal data we collect

4.1 In this Section 4 we have set out the general categories of personal data that we process and, in the case of personal data that we did not obtain directly from you, information about the source and specific categories of that data.

4.2 We may process data enabling us to get in touch with you ("contact data"). The contact data may include your name, email address, telephone number, postal address and/or

social media account identifiers. The source of the contact data is you and/or your employer. If you log into our website using a social media account, we will obtain elements of the contact data from the relevant social media account provider.

4.3 We may process your website user account data ("account data"). The account data may include your account identifier, name, email address, business name, account creation and modification dates, website settings and marketing preferences. The primary source of the account data is you and/or your employer, although some elements of the account data may be generated by our website. If you log into our website using a social media account, we will obtain elements of the account data from the relevant social media account provider.

4.4 We may process information contained in or relating to any communication that you send to us or that we send to you ("communication data"). The communication data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms.

4.5 We may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system.

5. Purposes of processing and legal bases

5.1 In this Section 5, we have set out the purposes for which we may process personal data and the legal bases of the processing.

5.2 Operations - We may process your personal data for the purposes of operating our website, the processing and fulfilment of orders, providing our services, supplying our goods, generating invoices, bills and other payment-related documentation, and credit control. The legal basis for this processing is our legitimate interests, namely the proper administration of our website, services and business.

5.3 Publications - We may process account data for the purposes of publishing such data on our website and elsewhere through our services in accordance with your express instructions. The legal basis for this processing would be consent or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

5.4 Relationships and communications - We may process contact data, account data, transaction data and/or communication data for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, post, fax and/or telephone, providing support services and complaint handling. The legal basis for this processing is our legitimate interests, namely communications with our website visitors, service users, individual customers and customer personnel, the maintenance of relationships, and the proper administration of our website, services and business.

5.5 Direct marketing - We may process contact data, account data and/or transaction data for the purposes of creating, targeting and sending direct marketing communications by email, SMS, post and/or fax and making contact by telephone for marketing-related purposes. The legal basis for this processing is our legitimate interests, namely promoting our business and communicating marketing messages and offers to our website visitors and service users. Integrum ESG will respond in a timely and compliant fashion to any request from a recipient to cease such marketing communications and/or delete contact data.

5.6 Research and analysis - We may process usage data and/or transaction data for the purposes of researching and analysing the use of our website and services, as well as researching and analysing other interactions with our business. The legal basis for this processing is our legitimate interests, namely monitoring, supporting, improving and securing our website, services and business generally.

5.7 Record keeping - We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this policy.

5.8 Security - We may process your personal data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our website, services and business, and the protection of others.

5.9 Insurance and risk management - We may process your personal data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

5.10 Legal claims - We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

5.11 Legal compliance and vital interests - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

6. Providing your personal data to others

6.1 We may disclose your personal data to our insurers and/or professional advisers only insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice.

7. International transfers of your personal data

7.1 In this Section 7, we provide information about the circumstances in which your personal data may be transferred to a third country under UK and EU data protection law.

7.2 We may transfer your personal data from the European Economic Area (EEA) to the UK and process that personal data in the UK for the purposes set out in this policy, and may permit our suppliers and subcontractors to do so, during any period with respect to which the UK is not treated as a third country under EU data protection law or benefits from an adequacy decision under EU data protection law; and we may transfer your personal data from the UK to the EEA and process that personal data in the EEA for the purposes set out in this policy, and may permit our suppliers and subcontractors to do so, during any period with respect to which EEA states are not treated as third countries under UK data protection law or benefit from adequacy regulations under UK data protection law.

7.3 The hosting facilities for our website are situated in the UK. The competent data protection authorities have made an adequacy determination with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the competent data protection authorities.

7.4 Customer relationship data are situated in EU(Germany) and the US. The competent data protection authorities have made an adequacy determination with respect to the data protection laws of each of these countries. Transfers to each of these countries will be

protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the competent data protection authorities.

7.5 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

8. Retaining and deleting personal data

8.1 This Section 8 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

8.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

8.3 We will retain your personal data as follows:

(a) contact data will be retained for a minimum period of one year following the date of the most recent contact between you and us, and for a maximum period of 3 years following that date;

(b) account data will be retained for a minimum period of one year following the date of closure of the relevant account, and for a maximum period of 7 years following that date;

(c) transaction data will be retained for a minimum period of one year following the date of the transaction, and for a maximum period of 7 years following that date;

(d) communication data will be retained for a minimum period of one year following the date of the communication in question, and for a maximum period of one year following that date;

(e) usage data will be retained for one year following the date of collection.

8.4 Notwithstanding the other provisions of this Section 8, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

9. Your rights

9.1 In this Section 9, we have listed the rights that you have under data protection law.

9.2 Your principal rights under data protection law are:

(a) the right to access - you can ask for copies of your personal data;

(b) the right to rectification - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;

(c) the right to erasure - you can ask us to erase your personal data;

(d) the right to restrict processing - you can ask us to restrict the processing of your personal data;

(e) the right to object to processing - you can object to the processing of your personal data;

(f) the right to data portability - you can ask that we transfer your personal data to another organisation or to you;

(g) the right to complain to a supervisory authority - you can complain about our processing of your personal data; and

(h) the right to withdraw consent - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

9.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-%20the-general-data-protection-regulation-gdpr/individual-rights/>.

9.4 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

10. About cookies

10.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

10.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by

the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

10.3 Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

11. Cookies that we use

11.1 We use cookies for the following purposes:

(a) authentication and status - we use cookies to identify you when you visit our website and as you navigate our website, and to help us determine if you are logged into our website.

(b) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

12. Cookies used by our service providers

12.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

12.2 We use Netlify for web hosting. This services uses cookies for security and google analytics purposes. You can view the privacy policy of these service providers at <https://www.netlify.com/privacy/> and <https://policies.google.com/privacy>

13. Managing cookies

13.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

(a) <https://support.google.com/chrome/answer/95647> (Chrome);

(b) <https://support.mozilla.org/en-US/kb/enhanced-tracking-protectionfirefox-desktop> (Firefox);

(c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera);

(d) <https://support.microsoft.com/en-gb/help/17442/windows-internetexplorer-delete-manage-cookies> (Internet Explorer);

(e) <https://support.apple.com/en-gb/guide/safari/manage-cookiesand-website-data-sfri11471/mac> (Safari); and

(f) <https://support.microsoft.com/en-gb/help/4468242/microsoftedge-browsing-data-and-privacy> (Edge).

13.2 Blocking all cookies will have a negative impact upon the usability of many websites.

13.3 If you block cookies, you will not be able to use all the features on our website.

Document Ownership

The DPO is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with Integrum ESG's review requirements. A current version of this document is available to all members of staff in the company shared platform (Sharepoint).