

## **Privacy Policy**

Last updated: September 7, 2024

ESGDS Global FZE, Dubai, UAE will be referred as (“**ESGDS**”, “**we**”, “**us**” and “**our**”) in this Privacy Policy (“**Privacy Policy**”).

This Privacy Policy describes our policy and procedures on how we collect, store, use and share personal data, along with details on how you can reach out to us with privacy-related inquiries. Additionally, this Privacy Policy outlines your rights as a data subject and choices you have, including the right to object to certain usages of your personal data by us.

This Privacy Policy covers the information we collect in the usual course of our business when providing services through ESGSure.com and ESGSure.ai (“**Website**”) and our related services, applications, websites, applications, events, newsletters, communications and sales and/or marketing activities (collectively, the “**Services**”).

**Personal data.** Reference to ‘personal data’ or ‘personal information’ under this Privacy Policy means any information that relates to an identified or identifiable individual. For the purposes for GDPR, it means any information relating to you such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity. For the purposes of the CCPA, it means any information that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly, with you.

**Commitment to data privacy rights.** We are committed to rigorously protecting your privacy rights. As a foundational practice across our business operations, we adhere to the General Data Protection Regulation (GDPR), acknowledging its high standards for data protection. It’s worth noting that depending on your geographical location, the extent of data privacy protections afforded to you may vary or may not be applicable at all, however in preview of ESGDS being data compliant and respecting privacy rights its critical for you to review the guidelines.

**Applicability of this Policy.** This Policy is applicable or relevant to anyone who visits our Website and/ or utilizes our Services. – whether you are a “**User**” (defined as an individual acting in a business capacity who has set up an “**Account**” with us for the purpose of utilizing our Services), or a “**Professional Individual**” (defined as someone who has voluntarily made certain information such as profile unique resource locator, image and employment details, and even some personal data like email and hobbies publicly available on the internet), or a “**Site Visitor**” (defined as anyone who accesses or uses our Website but does not fit into the User category including Professional Individuals.

This Privacy Policy should be read along with the “**Terms of Use**” and the “**Cookies Policy**”.

## **Information We Collect**

While you visit our Website and/ or utilize our Services, we may ask us to provide certain personal data.

Information Collection Methods: We gather information about you if you are a Site Visitor or User through direct interactions with you and automatically as you utilize our Services. It is possible that we might consolidate information about you from these different avenues. You have the option to control the data we collect; when prompted to provide personal information, you can opt out. However, opting out of providing necessary information may hinder your ability to fully utilize certain Services (or parts thereof). The type of information we collect is influenced by your interactions with us, your settings and privacy choices not limited to ESGDS services, and the specific Services you utilize.

Information Gathering During n Creation and Accessing Services: We collect data directly from you when you input information into our Services. During Account creation or while accessing our Services, we may collect various personal details. These could include, but are not limited to, your legal name, username, phone number, geographical location, email address, and employer details. Additionally, if you choose to provide it, we may collect your business name, location, and other contact details.

Where we allow you to sign-up and log-in to use the Services through any third-party social media services (e.g., google, apple, etc.) and you decide to sign-up through or otherwise grant us access to such third-party social media services, we may collect personal data that is already associated with your third-party social media service’s account, such as your name, your email address, your activities associated with that account.

Data Collection through Communication: When you reach out to us in any way, be it through phone, email, or other means, we retain all the information you share, including records of our interactions. Please note that for training and security reasons, we may monitor and record phone conversations as well as written communications. Should you offer feedback, testimonials, or participate in customer surveys, events, promotions, product launches, or contests, we will gather any information you choose to provide during these activities.

## **Media**

If you upload media in form of profile picture, avatars or media resources directly fetched basis your sign in activity using a social media or email or form based sign up process to the Website, you should avoid uploading images with embedded location data (EXIF GPS) included. The media will be used to identify a user in our system to differentiate between authentic user and thus stopping any

BOT based activity on the platform which could potentially breach the privacy of ESGDS' users or ESGDS' infrastructure.

### **Understanding personal data**

ESGDS respects data minimisation principles while collecting personal data. This means that we collect only a minimal amount of personal data through the Website and Services that is necessary to ensure the proper provision of the Services. We use your personal data for limited, specified and legitimate purposes mentioned in this Privacy Policy. We do not use your personal data for any purposes that are different from the purposes for which it was provided. When processing personal data, we make sure that we do so by relying on one of the available legal basis. You can find more information about the legal basis below.

- **Your user account.** When you create an Account on the Website, we collect your name, email, and we may also request additional information as for us to craft services better for instance title, organisation you work for etc. We use such information to register and maintain your Account, enable your access to the Services, provide you with the requested services, contact you, if necessary, and maintain our business records. We keep your personal data only till the time you have an Account with us.
- **Your activity on the Website.** When you use the Website, we use third party applications such as Google Analytics to better monitor user traffic and trends on our website. These trends help us optimise the service and experience better for you as a user. Using Google Analytics, the system will monitor your usage basis though not limited to device type, session length, session time, clicks on the page, engagement on different pages and location data based on your IP address. We use such information to ensure security of the Website, analyse your use of the Website, identify your location, to ensure optimal user experience. We keep your personal data only till the time you have an Account with us.
- **Inquiries.** When you contact us via our embedded third party messenger service, we collect your name, email address, and any information that you decide to include in your message. We use such data to respond to your inquiries. We keep your personal data only till the time you have an Account with us.
- **Payments.** When you make a payment, you will be asked to provide your payment details that depend on the chosen payment provider (like your name, credit card number, expiration date, security code, and billing address). Please note that we use third-party payment processors. We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal data is governed by their privacy policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American

Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

- **Cookies.** When you browse the Website, we collect your cookie-related data. For more information about the purposes for which we use cookies, please refer to our Cookies Policy.
- **Other purposes.** We may use your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Services, marketing and your experience.
- **Affiliated Companies.** In certain instances, we may collect personal information from our Affiliated Companies, such as if you integrate your use of our Services with an account or other information from one of our Affiliated Companies.
- **Your feedback.** If you contact us, we may keep records of any questions, complaints, recommendations, or compliments provided by you and any subsequent responses. Where reasonably possible, we remove all personal data that is not necessary for keeping such records.

The legal basis on which we rely to collect, store, process or transfer your data is: (a) your consent, or (b) performing a contract with you (including pre-contractual obligations thereof), or (c) pursuing our legitimate business interest (i.e., operate, analyse, grow, administer and promote the Services), or (d) meeting our legal obligations, or (e) protecting the you vital interest, or of another natural person, or (f) carrying out an act in public interest. Upon receipt of a request, we can clarify the specific basis that applies to a particular personal data collected, stored, processed or transferred here.

### **Aggregated and de-identified data**

If we combine your non-personal data with certain elements of your personal data and such a combination allows us to identify you as a natural person, we will handle such aggregated data as personal data and make sure that we have a legal basis for processing it. If your personal data is de-identified in a way that it can no longer be associated with a natural person, it will not be considered personal data and we may use it for any business purpose.

### **Refusal to provide personal data**

If you refuse to provide us with your personal data when we ask for it, we may not be able to perform the requested operation and you may not be able to use the full functionality of the Website, receive the Services, or get our response. Please contact us immediately if you think that any personal data that we collect is excessive or not necessary for the intended purpose at.

### **How We Keep Your Personal Data Secure**

To help prevent unauthorized access, maintain data accuracy, and ensure the appropriate use of information, we have put in place appropriate technical, organizational, physical, electronic, and managerial procedures designed to protect the personal data we collect (“**Security Measures**”). The measures we use are designed to provide a level of security appropriate to the types and nature of the personal information we process. Our security measures include secured networks, encryption, access limitation, anonymisation, and carefully selected service providers. We have processes for testing, assessing and evaluating the effectiveness of our Security Measures, including training and communication to employees, for ensuring the security of our processing.

We implement commercially reasonable technical, administrative and organisational measures to protect personal information both online and offline from loss, misuse, and unauthorised access, disclosure, alteration or destruction. However, no internet or email transmission is ever fully secure or error free. Therefore, you should take special care in deciding what information is shared to us via the internet service or email. In addition, we are not responsible for circumvention of any privacy settings or security measures contained on the Website or our Services or third party websites.

### **Use and Disclosure of Personal Data**

ESGDS does not sell, rent or lease your personal data to third parties to monetize through ads. We may however share your personal data with third-parties as below:

**Data processors.** ESGDS may share data with trusted partners to help perform statistical analysis, send you email or postal mail and provide customer support. All such third parties are prohibited from using your personal data except in the provision or delivery of information, tools, resources, and such like that you have requested through download options with ESGDS, or in the provision of third party services to ESGDS and they are required to maintain the confidentiality of your personal data.

**Affiliated Companies.** We may combine and use the personal data and usage data we collect from the Services offered by us and our Affiliated Companies over various websites to provide, protect, and improve them, and to develop and offer new services and products. We and our Affiliated Companies may treat you as a single user of these combined services and products. However, any personal data we share with Affiliated Companies will only be used, disclosed and otherwise processed by such Affiliated Companies under the same terms as those applicable to us set forth in this Privacy Policy.

**Business transfers.** Should ESGDS undergo a sale, merger, consolidation, change in control, transfer of substantial assets, reorganization, or liquidation, ESGDS’ accumulated customer information will be treated as an asset and, like other business assets, and be subject to transfer to or acquisition by a third party. We may also disclose information about our users in connection with a commercial transaction where we, or any one of our businesses, is seeking financing, investment, support, or funding.

**Commercial communication.** If we have your email address, we may, from time to time, send you a newsletter informing you about the latest developments related to the Services, our Affiliated Companies and our special offers. You will receive our newsletters in the following instances:

- If we receive your express (“**opt-in**”) consent to receive marketing messages; or
- If you voluntarily subscribe for our newsletter; or
- If we decide to send you information closely related to Services already used by you.

The newsletters sent by us may contain tracking pixels that allow us to conduct analysis of our marketing campaigns. Tracking pixels allow us to see whether you opened the newsletter and what links you have clicked on. We use such information to conduct analytics and pursue our legitimate business interests.

If necessary, we will send you important informational messages, such as confirmation receipts, invoices, order updates, payment information, technical emails, and other operational and administrative updates. Please note that such messages are sent on an “**if-needed**” basis and they do not fall within the scope of commercial communication that may require your prior consent. You cannot opt-out from these service-related notices.

**Submissions.** Any content, document or image that you upload to the Website during the course of utilising our Services, (other than the purposes listed under “**Understanding personal data**”) , and contains personal data, will not be controlled by us and we do not control the policies and practices of any other third party site or service which may interact with our Services.

**Legal and government body requirements.** ESGDS will disclose your personal data, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on ESGDS or the site; (b) protect and defend the rights or property of ESGDS; and, (c) act under exigent circumstances to protect the personal safety of users of ESGDS, or the public. Your technical (non-personal) data may be disclosed to third parties for any purpose. For example, we may share it with prospects or partners for business or research purposes, for improving the Services, responding to lawful requests from public authorities or developing new products and services.

### **Tracking Technologies & Analytics Services**

We and our third-party partners and vendors may use tracking technologies, such as cookies, pixels, and web beacons and collect and store information about you when you use or interact with our

Services. For more information about opting out from such tracking technologies, please refer to our Cookies Policy.

### **Your Data Protection Rights**

You may request access to or ask us to correct, update, or delete your personal data. In addition, you can object to processing of your personal data, ask us to restrict processing of your personal data (including specifically not to use automated decision-making in profiling), or request portability of your personal data. Similarly, if we have collected and processed your personal data with your consent, you can withdraw your consent at any time. Withdrawing your consent may result in Services being discontinued or being significantly impacted, however it will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.

To exercise your rights under GDPR or CCPA, you can contact us by using the information below under “Contact Information”. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws no later than within 30 days. We may ask you to verify your identity in order to help us respond efficiently to your request.

**Privacy Settings and Opting Out.** Any recipient of email notices/newsletters/surveys may opt out of receiving them at any time. To opt out of receiving emails, follow the unsubscribe instructions located near the bottom of each service update, newsletter, or promotional email, or email your request using the information below under “Contact Information”.

**Turning off tracking technologies.** Our Website will alert you each time a persistent or session cookie is being sent, or you can choose to reject such cookies.

### **GDPR-specific Disclosures**

This section is applicable only to (i) residents of the European Economic Area and Switzerland (“**European Residents**”), and discusses how we comply with the General Data Protection Regulation (2016/679) of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons regarding the processing of Personal Information and on the free movement of such data (“**EU GDPR**”); (ii) residents of the United Kingdom (“**UK Residents**”), and discusses how we comply with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (United Kingdom General Data Protection Regulation), as amended by the Data Protection, Privacy and Electronics Communications (EU Exit Amendment) Regulations 2020 (“**UK GDPR**”). Collectively, EU GDPR and UK GDPR are referred to as “**GDPR**” in this Privacy Policy.

Under the GDPR, we are the controller and co-processor of the personal data of European Residents and UK Residents. Our purpose for collecting and processing personal data from European Residents

or UK Residents is to provide them with information regarding our Services and them utilising our Services. The legal basis for collecting personal data is your consent to obtain information about, and you utilizing our Services. You may withdraw consent from receiving marketing and promotional communications by clicking the “**Unsubscribe**” link on the communication or contacting us by using the information below under “Contact Information”.

European Residents and UK Residents may obtain information about the personal data that we hold about them by contacting us using the information below under “Contact Information”.

### **California-specific disclosures**

The section is applicable only to individuals or households in California (“**California consumers**”).

The California Consumer Privacy Act (“**CCPA**”) provides California consumers with additional rights regarding personal information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly with a particular consumer or household. The categories of personal information we collect are generally described above but differ for individual consumers depending on the Services used by such consumers.

Under the CCPA, California consumers have the following rights:

#### *Right to Know and Right to Delete*

A California consumer has the right to request that we disclose what personal information we collect, use, disclose and sell. A California consumer also has the right to submit requests to delete personal information.

When we receive a request to know or delete from a California consumer, we will confirm receipt of the request within 10 business days and provide information about how we will process the request, including our verification process. We will respond to such requests within 45 days.

#### *Right for Disclosure of Personal Information*

A California consumer may also submit requests that we disclose specific types or categories of personal information that we collect.

Under certain circumstances, we will not provide such information, including where the disclosure creates a substantial, articulable and unreasonable risk to the security of that personal information, customers’ accounts with us, or the security of our systems or networks. We also will not disclose California consumers’ social security numbers, driver’s license numbers or other government-issued identification numbers, financial account numbers, any health insurance or medical identification numbers, or account passwords and security questions and answers.

#### *Submitting Requests*



If you are a California consumer and would like to make any requests under the CCPA, please direct them to us using the information below under “Contact Information”.

### Verifying Requests

If we receive any request we will use a two-step process for online requests where the California consumer must first, clearly submit the request and then second, separately confirm the request. We will use other appropriate measures to verify requests received by mail or telephone.

In submitting a request, a California consumer must provide sufficient information to identify the consumer, such as name, email address, home or work address, or other such information that is on record with us so that we can match such information to the personal information that we maintain. Do not provide social security numbers, driver’s license numbers, account numbers, credit or debit card numbers, medical information or health information with requests. If requests are unclear or submitted through means other than as outlined above, we will provide the California consumer with specific directions on how to submit the request or remedy any deficiencies. If we cannot verify the identity of the requestor, we may deny the request.

### California Do Not Track Disclosures

Although some browsers currently offer a “do not track (‘DNT’) option,” no common industry standard for DNT exists. We therefore do not currently commit to responding to browsers’ DNT signals.

### **International data transfers**

Your data may be collected, stored or processed outside the country in which you reside. Even though you access the Website and/ or utilize the Services from a foreign land we ensure we will follow the best practices in keeping your information protected. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your personal data will take place to an organization or a country unless there are adequate controls in place including the security of your data.

### **Miscellaneous**

#### **Children**

Our Services are directed at an audience that are not under the age of 18 (‘minors’). ESGDS asks that minors not submit any personal data to us. ESGDS does not knowingly collect personal data from minors, and if we obtain actual knowledge that a user is minor, we will take steps to remove that individual’s personal data from our systems.

#### **Retention of Personal Data**

We retain personal data we collect from you for as long as you use our Services or, if longer, as necessary to fulfil the legitimate business need for which it was collected. For example, we retain information in order to provide you with the Services, to comply with applicable legal, tax, or accounting requirements, and to enforce our agreements, prevent fraud, assist with investigations, resolve disputes, analyse or troubleshoot programs, enforce our terms of use, or take other actions permitted by law. We may also retain information to prevent re-registration in the event that your account has been suspended or terminated or to create an archival copy of your information, which might be used by us for record keeping and internal purposes.

We do not discriminate against you if you decide to exercise your rights. It means that we will not (i) deny any services, (ii) charge you different prices, (iii) deny any discounts or benefits, (iv) impose penalties, or (v) provide you with lower quality services.

### **Changes to This Privacy Policy**

From time to time, ESGDS may update its Privacy Policy. Where these changes are material in nature we may notify you either by prominently posting a notice of such changes prior to implementing them, by directly sending you a notification, or by posting the most recent version of the Privacy Policy on the Website with the “**Last Updated**” date posted at the top. You should check the Website frequently for updates. We encourage you to review this Privacy Policy frequently to be informed of how ESGDS is collecting and protecting your personal data.

### **Links to Other Websites**

ESGDS is not responsible for the content or the privacy policies of websites to which it may link. This Privacy Policy applies solely to information collected by ESGDS. You should consult the respective privacy policies of any applicable third parties to learn more about their privacy practices.

### **Contact Information**

If you have any questions, comments or concerns, please contact us using the details below:

Email: [info@esgsure.com](mailto:info@esgsure.com)