

PRIVACY NOTICE

ESTEIRO BUSINESS SOLUTIONS LIMITED

Introduction & Contents

Esteiro Business Solutions Limited (**Esteiro, we, our, us**) respects your privacy and is committed to protecting your personal data. This privacy notice explains how we use and protect the personal data you provide to us. It also explains your privacy rights and protections.

We have tried to keep this privacy notice simple without compromising on the information provided to you. We have therefore broken it down into the following sections.

SECTION	HEADING
1.	<u>Important information & our details</u>
2.	<u>The data we collect about you</u>
3.	<u>How your personal data is collected</u>
4.	<u>How we use your personal data</u>
5.	<u>Disclosures of your personal data</u>
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1. [Important information & our details](#)

Purpose of this privacy notice

This privacy notice gives you information about how we collect and process personal data you provide to us, including any data you provide via our website (<https://www.gold-vision.com/>) (our **Site**), when you register with us, use our software or our platform (**Platform**), receive services or when you provide us with your contact details through day to day business contact.

This privacy notice should be read together with any other privacy notice or fair processing notice we may provide when we are collecting or processing personal data about you. This privacy notice supplements any other notices and is not intended to override them.

Our contact details and role

We are the data controller responsible for your personal data. Our full details are:

Name: Esteiro Business Solutions Limited

Company registration number: 04292582

Data protection registration number: Z617694X

Email address: privacy@gold-vision.com

Postal address: Ryehills Park, Ryehills Road, West Haddon, Northamptonshire, NN6 7BX

Telephone number: +44 (0)1788 511110

If you have any questions about this privacy notice, including any requests to exercise your legal rights (see section 9 below), please contact the data privacy manager using the details set out above.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) (www.ico.org.uk), which is the supervisory authority for UK data protection issues. However, we ask that you contact us in the first instance and give us the opportunity to address your concerns before you consider contacting the ICO.

It is important that the personal data we hold about you is accurate and current, so please let us know if your personal data changes at any time.

Third-party links

Our Site and/or our Platform may include links to third-party websites, vendor offerings or other applications, plug-ins and/or applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, you should read the privacy notice of any website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer the following kinds of personal data about you, which we have summarised into categories:

- **Identity Data** includes first name, last name, username, password or similar identifier.
- **Contact Data** includes billing address, delivery address, email address, Social Media ID's and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website or our platform.
- **Profile Data** includes your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.

- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

The above categories are used as defined terms elsewhere in this privacy notice, in particular section 4.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Our business offering is not intended for children and we do not knowingly collect data relating to children.

Personal data required to perform a contract

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform our obligations under our contract with you. In that case, we may have to cancel a product or service. If we do, we will notify you.

3. How your personal data is collected

We use different methods to collect your personal data including through:

- **Directly from you.** You may give us your Identity and Contact Data either face to face or by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our website or platform;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - meet us at business or networking events; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our site or our platform, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy www.gold-vision.com/cookie-policy for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EU;
 - (b) advertising networks based inside the EU, such as SelectCRM and outside the EU such as Business Software.
 - Identity and Contact Data from network organisations based in the EU.
 - Identity and Contact Data from publicly available sources such as Companies House based inside the EU.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform our business contractual obligations to your business.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Legitimate Interest(s) means the interest of conducting and managing our business to enable us to give you good services/products and a good and secure experience. We consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Please contact us if you would like any further guidance concerning how we assess legitimate interests against any potential impact on you.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and legal bases we rely on in doing so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Personal Data Retention
To register your interest in our products and services	I. Identity II. Contact III. Marketing and communications	<ul style="list-style-type: none"> • Necessary for our legitimate interests • Specific Consent gathered in certain circumstances 	<ul style="list-style-type: none"> • Lead Data – 2 years • Prospect Data – 7 years
To register you as a customer	I. Identity II. Contact	<ul style="list-style-type: none"> • Performance of a contract with you 	<ul style="list-style-type: none"> • Live Customer – 10 years
To process and deliver goods or services to you including: a) Manage payments, fees and charges b) Asking you to leave a review or take a survey c) Notifying you about changes to our terms or privacy notice	IV. Identity V. Contact VI. Marketing and Communications	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests 	<ul style="list-style-type: none"> • Live Customer – 10 years • Dormant Customer – 6 years

To administer and protect our business, our Site and our Platform (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	I. Identity II. Contact III. Technical	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) • Necessary to comply with a legal obligation 	<ul style="list-style-type: none"> • Industry or Supplier contacts - 10 years
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	I. Identity II. Contact III. Profile IV. Usage V. Marketing and Communications VI. Technical	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) 	<ul style="list-style-type: none"> • Lead Data – 2 years • Prospect Data – 7 years • Live Customer – 10 years
To use data analytics to improve our Site, Platform, products/services, marketing, customer relationships and experiences	I. Technical II. Usage	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) 	<ul style="list-style-type: none"> •

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms regarding our marketing activities:

- *Promotional or educational information from us*

We may use your Identity, Contact, Technical, Usage and Profile Data to decide what we think you may want or need, or what may be of interest to you to use our platform more effectively.

You will receive technical and marketing communications from us if you have requested information from us or purchased products or services from us and, in each case, you have not opted out of receiving that marketing.

- *Opting out*

You can ask us to stop sending you marketing messages at any time by using the unsubscribe link, or by updating your marketing preferences from links within the e-mail or by contacting us at privacy@gold-vision.com.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us for the purposes of Gold-Vision support.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal third parties – Esteiro Business Solutions Canada, Inc. acting as joint controllers or processors and who are based in Canada and provide coordinated sales implementation and support services.
- The following external third parties:
 - Professional advisers including lawyers, accountants and auditors based in the UK who provide [legal and accounting services].
 - HM Revenue & Customs, regulators and other authorities based in the United Kingdom who may require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

Although your personal data is held in UK secure environments, our employees may view your data over secure internet devices outside the European Economic Area to countries such as Canada and the US. This classifies as an international data transfer. For example, Esteiro Business Solutions Limited and Esteiro Business Solutions Canada, Inc. are sister companies that operate jointly to support our customer base.

Whenever we transfer your personal data out of the EEA, we ensure that the data is transmitted using secure, encrypted protocols and subject to the same security processes as the UK business.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Personal data retention periods are summarised in the table in [paragraph 4](#)

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see [Request erasure](#) below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have Data Subject Rights under data protection laws in relation to your personal data. You can find further information from the Information Commissioners website at www.ico.org.uk.

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not

always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at privacy@gold-vision.com

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.