

PRIVACY POLICY

1. INFORMATION FOR THE USER

Who is responsible for processing your personal data?

ESA Global Ltd. is the **DATA CONTROLLER** responsible for processing the USER's personal data and hereby informs the USER that such data will be processed in accordance with current data protection regulations (UK GDPR, Data Protection Act 2018).

Why do we process your personal data?

To maintain a business relationship with the USER. The intended processing activities are as follows:

- To send advertising and commercial communications by email, fax, SMS, MMS, social media, or by any other electronic or physical means, whether currently available or developed in the future, that enables commercial communications to be sent. Such communications will be sent by the DATA CONTROLLER and will relate to its products and services or those of its partners or suppliers with whom it has entered into a promotional agreement. In such cases, third parties will never have access to personal data.
- To conduct market research and statistical analyses.
- To process orders and requests, respond to inquiries, or handle any other type of request submitted by the USER through any of the contact methods available on the DATA CONTROLLER's website.
- To send electronic newsletters containing news, offers, and promotions relating to our business activities.

What is the legal basis for processing your personal data?

The processing of your personal data is lawful under Article 6 of the GDPR on the following grounds:

- **With the USER's consent:** for sending commercial communications and newsletters.
- **On the basis of the DATA CONTROLLER's legitimate interests:** for conducting market research, statistical analyses, etc., and processing orders, requests, etc. submitted by the USER.

How long will we retain your personal data?

Personal data will be retained for no longer than is necessary to fulfill the purposes for which it is processed or for as long as there are legal requirements requiring its retention. Once such purposes no longer apply, the data will be deleted using appropriate security measures to ensure its anonymization or complete destruction.

To whom do we disclose your personal data?

Personal data is not expected to be disclosed to third parties, except where necessary for the development and implementation of the purposes of the processing. In such cases, data may be disclosed to our service providers involved in communications, with whom the DATA CONTROLLER has entered into the confidentiality and data processing agreements required by applicable data protection legislation.

What are your rights?

The USER has the following rights:

- The right to withdraw consent at any time.
- The right of access, rectification, data portability, and erasure of personal data, as well as the right to restrict or object to its processing.
- The right to lodge a complaint with the Spanish Supervisory Authority (AEPD) if the USER considers that the processing of their personal data does not comply with applicable legislation.

Contact details for exercising your rights:

ESA Global Ltd.

Plumpton House, Plumpton Road, Hoddesdon, Hertfordshire EN11 0LB, UK

Email: info@esalens.com

Details of the Data Protection Officer:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, UK

2. MANDATORY OR OPTIONAL NATURE OF THE INFORMATION PROVIDED BY THE USER

By checking the corresponding boxes and entering data in the fields marked with an asterisk (*) in the contact or download forms, USERS expressly, freely, and unequivocally acknowledge that such data is necessary for the provider to process their request, while voluntarily providing their data in the remaining fields.

The USER guarantees that the personal data provided to the DATA CONTROLLER is accurate and undertakes to notify the DATA CONTROLLER of any changes thereto.

The DATA CONTROLLER hereby informs USERS that all data requested through the website is mandatory, as it is necessary to provide the USER with an optimal service. If not all requested data is provided, it cannot be guaranteed that the information and services provided will fully meet the USER's needs.

3. SECURITY MEASURES

In accordance with the provisions of applicable personal data protection legislation, the DATA CONTROLLER complies with all requirements established under the GDPR and the LOPDGDD

with respect to the processing of personal data for which it is responsible and, in particular, with the principles set forth in Article 5 of the GDPR, pursuant to which personal data must be processed lawfully, fairly, and transparently in relation to the data subject and must be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

The DATA CONTROLLER guarantees that it has implemented appropriate technical and organizational policies and measures to apply the security measures required under the GDPR and the LOPDGDD in order to protect the rights and freedoms of USERS and has provided them with the appropriate information to enable them to exercise those rights.

For further information regarding privacy safeguards, you may contact the DATA CONTROLLER at ESA Global Ltd., Plumpton House, Plumpton Road, Hoddesdon, Hertfordshire EN11 0LB, UK

Email: info@esalens.com

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