

# Data Protection Policy

**Last Updated:** January 5th, 2026

**ESG DATA CORE** ("Company", "we", "us", or "our"), a legal entity incorporated in Dublin, Ireland, provides the Corporate Impact Stewardship (CIS) platform, a SaaS solution for ESG data management, sustainability benchmarking, and automated reporting.

This Privacy Policy explains how we collect, use, and protect information when the **Customer** uses our CIS Platform ("Service"). It is designed to be read in conjunction with our Terms of Use and our Data Processing Agreement (DPA).

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## 1. OUR ROLE (CONTROLLER VS. PROCESSOR)

To ensure compliance with the privacy laws, we distinguish between two types of data processing:

- **Data Controller:** We act as a Controller for the personal information provided to create accounts, manage billing, and communicate with customers (e.g., names and business emails of platform administrators).
- **Data Processor:** We act as a Processor for the "Customer Data" (ESG metrics, sustainability indicators) uploaded to the Service. We process this data strictly under the Customer's instructions.

## 2. INFORMATION WE COLLECT

### A. Account Information (Controller Data)

- **Identity Data:** Name, job title, and company details.
- **Contact Data:** Business email address and phone number.
- **Credentials:** Login information used to access the platform. Customers are responsible for maintaining the confidentiality of these credentials.
- **Billing Data:** Information necessary to process payments as specified in the Order Form (e.g., VAT number, billing address).

### B. Service Data (Processor Data)

This includes the ESG metrics and sustainability indicators submitted to the Platform.

- **Automated Processing:** We process this data via automated algorithms. Manual access by our staff is strictly limited to technical support or maintenance requests.

- **Sensitive Data Prohibition:** Customers agree not to upload sensitive personal data (e.g., biometric, health, or genetic data) to the platform.

#### C. Usage Data & Cookies (Collected Automatically)

- **Logs:** We collect logs regarding interactions with the Service, including IP addresses, access times, and device information for security monitoring.
- **Cookies:** We use strictly necessary cookies to maintain user sessions and platform security. We do not use third-party tracking cookies for advertising without explicit consent.

### 3. LEGAL BASIS FOR PROCESSING

Under GDPR, we process personal data based on:

- **Contractual Necessity:** To provide the Service and customer support.
- **Legal Obligation:** For tax, billing, and regulatory compliance in Ireland.
- **Legitimate Interest:** To ensure platform security, prevent fraud, and improve Service performance through anonymized analytics.

### 4. HOW WE USE YOUR INFORMATION

- **Service Delivery:** To provide the SaaS solution for ESG management and reporting.
- **Security:** To conduct vulnerability assessments and maintain the AWS environment.
- **Communication:** To send invoices, security updates, and critical patches.
- **Anonymized Benchmarking & IA Training:** ESG DATA CORE shall have the right to aggregate and anonymize Customer Data to generate industry benchmarks and improve our automated algorithms (Machine Learning). This process uses **Differential Privacy** techniques to ensure that no individual, entity, or specific data point can be re-identified. Once data is irreversibly anonymized, it ceases to be personal data.

### 5. INFRASTRUCTURE AND SECURITY

- **Hosting:** The Service is hosted on Amazon Web Services (AWS) using a multi-account architecture for logical isolation.
- **Encryption:** \* **In Transit:** Data is encrypted via TLS 1.2 or superior protocols.
  - **At Rest:** Data is encrypted using AES-256 standards.
- **Isolation:** Customer data is stored in dedicated data shards or logically isolated containers.

### 6. DATA RETENTION AND DELETION

- **Subscription Term:** Data is retained throughout the active Subscription.
- **Post-Termination:** Upon account termination, Customer Data remains available for export (CSV format) for **60 days**.

- **Permanent Deletion:** After this 60-day period, all Customer Data is permanently deleted from our production systems, subject to standard backup rotation cycles.

## 7. DATA SHARING AND TRANSFERS

- **Sub-processors:** We utilize third-party infrastructure providers (e.g., AWS). A current list of sub-processors is available upon request.
- **International Transfers:** As an Irish entity, we ensure that any data transfers outside the EEA comply with GDPR through **Standard Contractual Clauses (SCCs)** or other legal adequacy mechanisms.
- **No Sale of Data:** We do not sell, rent, or trade your data with third parties.

## 8. YOUR RIGHTS

Under GDPR, you have the following rights:

- **Access and Rectification:** Update your information via the Service settings.
- **Erasure ("Right to be Forgotten"):** Request deletion of your account.
- **Data Portability:** Export your data in a structured, machine-readable format.
- **Objection:** Object to processing based on legitimate interests.

To exercise these rights, please contact our **CTO** at the email below. If you are an end-user of one of our Customers, please contact the Customer (the Controller) directly.

## 9. JURISDICTION

This Privacy Policy is governed by the laws of **Ireland**. Any disputes arising from privacy matters shall be resolved exclusively in the courts of **Dublin, Ireland**.

## 10. CONTACT US

If you have questions about this Policy or our data practices, contact us at:

**ESG DATA CORE** Attn: **CTO** Dublin, Ireland Email: [contact@esgdatacore.com](mailto:contact@esgdatacore.com)