

PRIVACY NOTICE

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The ESP Group comprises of ESP Systex Holdings Limited and its subsidiaries ESP Systex Limited and Journeycall Limited ("the ESP Group"). This privacy notice outlines what personal data the ESP Group collects and processes about you when you interact with this website, when you contact us by phone, email, letter, social media (or otherwise), use our online chat facility, complete one of our surveys or for other activities as referred to in the 'Our Processing' section below. It also covers use of CCTV at our office locations. Please note this privacy notice does not cover any personal data we collect during the course of onboarding new employees or providing services to our clients.

ESP Systex Holdings Limited shall be the Data Controller of any personal information collected via this website. Information will be shared within the ESP Group depending on the nature of the information, with the recipient group company becoming Data Controller of that information. All information shared will be limited to what is necessary to process the enquiry or otherwise attend to the issue.

Otherwise, the Data Controller of any personal data collected when you contact us will be the particular group company that you contact e.g. if you telephone Journeycall, the Data Controller shall be Journeycall. Lastly, the Data Controller of any personal data collected via CCTV at our office locations, shall be the group company that occupies that particular office.

Our DPO is WorkNest Limited. If you have any concerns about how the ESP Group processes your personal data or if you have a general enquiry in relation to data protection, please contact dpo@the-espgroup.com.

The ESP Group may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy was last reviewed in October 2026.

What is personal data?

Personal Data: means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Special Category of Data: means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

When we use the term 'personal data' we mean both personal data and special category of data.

Our Processing

Personal data is collected in several different ways dependent on your interaction with the ESP Group. The table below sets out what personal data we process about you, where we get it from, why we use it, our legal basis and who we share it with. We will not share your personal data with any other organisation or third parties without seeking your prior consent. Exceptions to this are:

1. where we are required to share your personal data in accordance with law e.g. such as to assist with investigations carried out by the police or other authorities or any regulatory requirement to which we are subject;
2. where we are undergoing a corporate restructure, sale or investment;
3. where we use third parties to undertake certain services on our behalf and in doing so they require to process personal data in order to do this. If so we will ensure adequate arrangements in place to protect your personal data. These include:

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- i) our Website chat provider;
- ii) our CRM platform;
- iii) Online Marketing Platform.
- iv) our legal or professional advisors including our external Data Protection Officer;

4. if stated in the table below.

Purpose	Personal Data	Where do we get it from?	Legal Basis	Will we Share it?
To respond to enquiries (online, via our online chat facility and/or otherwise).	Name, email, any information you provide to us.	When you submit an enquiry on our website, via our online chat facility, contact us by telephone, email, post, social media and/or complete feedback forms and questionnaires.	Legitimate Interest – it is in our legitimate interest to respond to enquiries.	We shall only share your personal data within the ESP Group as is necessary to respond to your enquiry.
To respond to a Data Subject Request	Name, email, any other information you provide to us.	From you or your representative.	Compliance with a legal obligation*. We are legally obliged to respond to a Data Subject Request.	We shall only share your personal data within the ESP Group as is necessary to complete your request.
To improve the website and for internal system administration	IP Address; your access to the website, your browser. Further information on how we use cookies is available in our Cookies Policy.	From you when you use our website, the cookies provide us with information. We also receive information from Google Analytics, Google Tag Manager and other third parties from time to time.	Our legal basis is that it is in our legitimate interest to use these to operate the website and to fix issues with the website. For non-essential cookies, we rely on your consent	No
To market our services, ideals or aims.	Name, email address.	From you	All marketing is aimed at business to business; therefore, legitimate interest is the lawful basis relied on for processing	We shall only share your personal data within the ESP Group as is necessary to respond to your enquiry.

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			relating to marketing.	
To manage visitors at our offices and for security of our offices and staff.	Name, organisation, vehicle registration number, telephone number, who they are visiting, images from CCTV.	From you when you visit our office and complete a Visitor Form, sign a visitor NDA or from our CCTV.	Our legal basis is that it is in our legitimate interest to identify visitors at our offices for security purposes.	No
Surveys and Market Research	Name, email and any information you provide to us e.g., postcode, preferences and interests.	From you	Consent	No
To perform a contract.	Name, email, occupation, employer.	From you or your employer.	Performance of a contract*	We shall only share your personal data within the ESP Group as is necessary to respond to your enquiry

* where the provision of personal data is a legal or contractual requirement or a requirement necessary to enter into a contract and you do not provide us with the necessary information, we may not be able to fulfil our obligations to you e.g. respond to your data subject request.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Read our **Cookies Policy**.

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How can I stop ESP Group using my personal data for marketing purposes?

If you no longer wish to receive communication from the ESP Group you can opt-out on any of our email communications or you can contact the DPO (details above).

How long will ESP Group retain my personal data?

ESP Group will keep your personal data for no longer than is necessary for the purpose we obtained it for, or until such time that you withdraw your consent and exercise your right to request that the ESP Group stops processing your personal data (if relevant). We have noted specific timeframes in our Record of Processing Activity Record for each company within the ESP Group. For more information on specific processing times, please contact the DPO (details above).

Does ESP Group make any automated decisions about me or profile my personal data?

No

Will the ESP Group transfer my personal data outside the EEA?

In some limited circumstances, the ESP Group engages third party processors who have servers located outside the UK. Where this does occur, we will ensure such transfer complies with applicable data protection laws and that adequate technical and organisational controls are in place including in some cases Standard Contractual Clauses. Currently we use third party processors with servers outside the UK as follows:

- Zoho CRM – Data centres are located in Dublin and Amsterdam. The UK government has decided that the EU provides an adequate level of security for personal data.

What are my rights in relation to the personal data the ESP Group holds about me?

We have summarised your rights below. Please contact our Data Protection Officer at the contact details above to exercise these rights.

- If we are relying on your consent, you can withdraw your consent at any time, at which point we shall stop processing your personal data in that way. Please note this does not affect the legality of our processing up to the date of your withdrawal of consent.
- You can seek to restrict our processing of your personal data, ask us to rectify any personal data we hold about you or object to us processing your personal data for the purposes stated above.
- You have the right to lodge a complaint with the Information Commissioners Office (ICO) if you think that we have infringed your rights. You can find more information about reporting a matter to the ICO at the following link: <https://ico.org.uk/>
- You have the right to access personal data held by us about you.
- In certain circumstances you have the right to ask us to provide you with your personal data in a structured, commonly used and machine-readable format to allow you (or us on your behalf) to transmit this information to another party. More information can be found at <https://ico.org.uk>
- In certain circumstances you have the right to ask us to erase the personal data we hold about you. Such circumstances include (a) where we no longer need your personal data for the purposes set out above; (b)

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if you withdraw your consent to our processing; (c) if you object to our processing based on our legitimate interest and we have no overriding legitimate grounds to continue processing your personal data; (d) if we process the data unlawfully; or where the personal data has to be erased to comply with legal obligation to which we are subject. We will consider any such request in line with GDPR. Please note that the above rights are not absolute and we will consider each request in line with applicable data protection laws.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.