

# Privacy Policy for ESOPA LTD

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## 1. Introduction

ESOPA LTD (hereinafter “the Company”), registered at 17 Bath Street, Weymouth, England, United Kingdom, DT4 7DS, provides global payroll services acting as a commercial agent for clients, facilitating payments to contractors. This Privacy Policy explains how we collect, use, store, and protect personal data in accordance with the UK General Data Protection Regulation (GDPR), the Data Protection Act 2018, and other applicable laws. By using our services, you agree to the data practices described in this policy.

## 2. Data We Collect

We collect personal data to provide and manage our services. Types of data we may collect include:

- Identity information: Full name, date of birth, identification documents (including passports), nationality, and other identity-related details.
- Contact details: Email addresses, phone numbers, and physical addresses.
- Financial information: Bank account numbers, crypto wallet addresses, payment details, salary information, tax information, and invoice records.
- Employment details: Contractor agreements, performance data, and any other work-related details necessary for payroll purposes.
- Technical data: IP addresses, browser type, login times, cookies, and interaction history on our website.
- Sensitive personal data: In some instances, we may process special categories of data (e.g., health information or background checks), but only where necessary and lawful.

## 3. How We Collect Data

We collect data through several channels, including:

- Direct interactions: Submission of information via online forms, contracts, and support communications.
- Verification services: Collection of identification and verification data (including passports and other identity documents) through third parties, such as Veriff.
- Third-party services: Data provided by clients regarding contractors and employment details.
- Automated technologies: Data collected through the use of cookies, log files, and other tracking technologies on our website.

## 4. Purpose and Legal Basis for Processing

We process personal data for the following purposes:

- Contractual obligations: To provide payroll services, make payments, and manage employment-related services.
- Legal compliance: Compliance with UK and international laws, including anti-money laundering (AML), know-your-customer (KYC) regulations, and tax reporting.
- Legitimate business interests: For service improvement, fraud prevention, data analytics, and marketing (with consent).
- User consent: For optional communications or marketing, where explicit consent is obtained.
- Public interest or vital interests: In rare cases, for protecting vital interests, such as in emergencies.

## 5. How We Use Your Data

We may use personal data to:

- Facilitate and process global payroll payments to contractors.
- Verify the identity of users and contractors through services like Veriff, including the processing of passports and other identity documents.
- Manage compliance with tax obligations and other legal requirements.
- Ensure security and fraud prevention.
- Improve our services and website functionality.
- Communicate with you about updates, changes to services, or marketing offers (with consent).
- Perform analytics and generate reports to better serve our clients.

## 6. Sharing of Your Data

We may share personal data, including identity documents (such as passports), bank account numbers, and crypto wallet addresses, with:

- Payment service providers: Only to the extent necessary to facilitate payments and transactions.
- Regulators and law enforcement: Where required by law, including AML and KYC compliance.
- Third-party service providers: Who help us process your data under GDPR-compliant agreements.

We do not share this sensitive data with any other third parties unless required by law or with your explicit consent.

## 7. Automated Decision-Making and Profiling

We may use automated decision-making processes for tasks like identity verification, fraud detection, and contract processing. These processes do not produce legal effects or similarly significant consequences for data subjects without human intervention. You have the right to request manual review of decisions made by automated systems.

## 8. International Transfers of Personal Data

If personal data is transferred outside the UK or European Economic Area (EEA), we ensure that such transfers are done in compliance with GDPR requirements. We rely on the following safeguards:

Adequacy decisions: Where the country receiving the data has been deemed to provide adequate protection by the European Commission.

Standard contractual clauses: Contracts with third-party processors to ensure data protection.

Binding corporate rules: For internal data transfers within a group of companies.

## 9. Data Security

We implement a variety of technical and organizational measures to ensure the security of personal data, including:

Encryption: Secure data transmission and storage.

Access controls: Limiting access to personal data only to authorized personnel.

Regular audits: Conducting regular reviews and risk assessments.

Data minimization: Collecting only the necessary amount of data required for specific purposes.

Despite these measures, no system is completely secure. In the event of a data breach, we will promptly notify affected individuals and regulatory authorities, as required by law.

## 10. Data Retention

We retain personal data for the duration necessary to fulfill the purposes outlined in this policy. Data retention periods may vary based on:

- Legal requirements: For compliance with tax and financial reporting obligations.
- Service provision: While the contractor or client relationship is active.
- Litigation and defense: Where necessary to protect our legal rights or defend against claims.

## 11. Data Subject Rights

As a data subject, you have the following rights under GDPR:

Right to access: Request access to your personal data and a copy of the information we hold about you.

Right to rectification: Request correction of inaccurate or incomplete personal data.

Right to erasure: Request deletion of your personal data where applicable.

Right to restrict processing: Request restriction of processing in certain circumstances.

Right to data portability: Request transfer of your data to another entity.

Right to object: Object to data processing based on legitimate interests.

Right to withdraw consent: Withdraw consent at any time for processing based on consent.

Right to complain: Lodge a complaint with the Information Commissioner's Office (ICO) if you believe your data rights have been violated.

## 12. Cookies and Online Tracking

We use cookies and other tracking technologies on our website for several purposes, including enhancing user experience and collecting analytics. You can control your cookie preferences through your browser settings. More information about our use of cookies can be found in our Cookie Policy.

## 13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or for legal reasons. Any updates will be published on our website, and we will notify users of significant changes.

## 14. Contact Information

If you have any questions about this Privacy Policy or wish to exercise your rights, please contact us at:

Email: [info@yougo.money](mailto:info@yougo.money)

Address: 17 Bath Street, Weymouth, England, United Kingdom, DT4 7DS