

## I.L. GROW SUSTAINABILITY CONSULTING LTD PRIVACY POLICY

### 1. Introduction

1.1. This Privacy Policy sets out the way in which I.L. GROW SUSTAINABILITY CONSULTING LTD ("we" or "us" or "our"), a company incorporated and registered in Cyprus with registration number HE 431954, collects and processes Personal Information (as defined in paragraph 2.1 below) which are provided by our clients and/or any contact persons and/or functionaries, representatives, agents ("you" or "your") prior to and/or during the offering of our Services (as defined below) and/or which we otherwise collect in the course of our business.

This Privacy Policy also applies to our website [www.grow.com.cy](http://www.grow.com.cy) ("Website"), email communications, digital platforms and any other applications.

1.2. This Privacy Policy is effective from July 1<sup>st</sup> 2020. We may change this Privacy Policy at any time, and if we do so will post the changes to this page as well as the date that the changes take effect.

1.3. Our Privacy Policy below sets out in detail how we process your Personal Information (as this term is defined below), and we encourage and recommend that you read it in full. Below we will also provide you with a brief overview of how and why we process your Personal Information.

1.4. In general, we will only collect the Personal Information that we need from you to offer you our services (the "Services"). These may include:

- Sustainability Training
- ESG Strategy and Planning
- Sustainability Governance & Compliance Advisory
- Corporate Sustainability Reporting
- Sustainability communication services
- Sustainable Supply Chain Management
- Sustainability Related Audits
- Stakeholder Engagement & Materiality Analysis

1.5. By using our Services, you acknowledge that we, as well as any of our agents, partners and subcontractors, will process your Personal Information in accordance with this Privacy Policy, including for the purposes set out in paragraph 5 below. If you do not wish to provide your Personal Information on the basis set out in this Privacy Policy, you should not enter the relevant information on the Website, or otherwise provide us with your Personal Information. However, if you do not provide your Personal Information, you may not be able to use all of the Services.

1.6. Ultimately, we aim to only process your Personal Information where it is necessary. We will always keep your Personal Information secure. Your satisfaction with our Services and your safety are our primary concerns.

1.7. We are committed to protecting your privacy pursuant to applicable laws and regulations including the EU General Data Protection Regulation (the “GDPR”) (collectively the “Applicable Laws”) including safeguarding all confidential information entrusted to us.

## **2. The information we collect**

2.1. Prior to and/or during the provision of our Services, and as part of operating the Website, we collect your Personal Information, including Personal Information of the contact persons of our clients, for the purpose of providing information, communication, initiation, execution and termination of contracts with our clients.

"Personal Information" means, personal data as defined in the GDPR, and specifically any of the following: (a) any information from which you can be personally identified, including your name, surname, title, academic degree, company postal address, email address, home address, gender, telephone number, and date of birth, function/task in the company and/or (b) any financial information, including source of wealth, assets held and bank account details, and/or (c) any information about your employer or business and/or any information about your employees or officers, and/or (d) any documents evidencing such information.

It is noted that further Personal Information may be processed in the course of our contractual relationships with our clients.

2.2. We collect Personal Information which you provide to us, directly from the data subjects themselves (i.e. direct collection) including when you register or submit a query and information you provide in communications with us. Data subjects of the data processing described in this Privacy Policy, shall include without limitation, any contact persons (contact persons, functionaries, representatives, agents) of our clients and other interested parties. 2.3. Furthermore, we receive Personal Information from our clients who provide us with the Personal Information of their contact persons for the purposes of initiation or execution of contractual relationships.

2.4. We may also collect Personal Information through surveys which we, or clients engaged by us for such purpose, undertake. In addition, we collect information about your use of the Website and when we provide our Services.

2.5. Our Website and Services are addressed to adults and so we don't collect data of children.

2.6. When you use our Website we may automatically collect certain data about your device, browsing actions and pattern. We collect such data by using cookies and similar technologies. Please refer to our Cookies Policy below.

## **3. Information collected from third parties**

We may use information from third party service providers, such as fraud prevention/anti-money laundering (AML) compliance companies. This information may be used to comply with our AML obligations and in application of recognized sanction list and specifically designated nationals (SDN). Third-party service providers also help us verify your identity by registering and remembering your device

information (such as the model, operating system, browser version and IP address), which is used to confirm device identification.

#### 4. How we use your Personal Information

In accordance with Applicable Laws, we will only process your Personal Information where we have a lawful basis for doing so, in the following circumstances:

- (i) where it is necessary to provide services to you under the performance of the contract we have with you;
- (ii) where we are required to do so in accordance with legal or regulatory obligations;
- (iii) where you have given your consent;
- (iv) where it is in our legitimate interests to process your Personal Information, provided that none of these prejudice your own rights, freedoms and interests,
- (v) where it is necessary for protecting the vital interests of a natural person,
- (vi) where it is necessary to perform a task carried out in the public interest or exercise of official authority of the organization.

#### 5. What is the Purpose of Processing your Personal Information

The following list sets out the "Purposes" for which we (including any of our agents, group members, sub-contractors and/or employees) process your Personal Information, and the lawful basis on which we carry out such processing:

Purpose	Lawful Basis
Implementation of pre-contractual communication and fulfilment of contracts with our clients	Necessary for the performance of a contract. Legitimate interest to ensure the direct communication with the contact persons of our clients which is required for the initiation and fulfilment of contractual relationships
Preparation of offers invoicing and exchange of information for the purposes of contract fulfilment	Necessary for the performance of a contract. Legitimate interest to ensure the direct communication with the contact persons of our clients which is required for the initiation and fulfilment of contractual relationships
To set-up, administer and manage your dossier and records	Necessary for the performance of a contract
To provide and personalise our Services	Necessary for the performance of a contract
To provide information, communication, initiation, execution and termination of contracts with you and/or our clients	Necessary for the performance of a contract
To receive and respond to your communications and requests	Necessary for the performance of a contract where such communication relates specifically to our Services, otherwise consent

To notify you about updates to our Website and Services	Necessary for the performance of a contract
To ensure that we are able to fulfil our regulatory obligations regarding your dossier and to comply with our obligations under Applicable Laws	Necessary to comply with a legal or regulatory obligation
To prepare statistics relating to the use of our Website and Services by you and other customers	Legitimate interests so we can understand the use of, and therefore improve, our Website and Services
To provide you with information about, and support for, our Services, including changes to our Services, technical updates for the Website and changes to this Privacy Policy and Cookies Policy	Necessary for the performance of a contract and necessary to comply with a legal or regulatory obligation
To keep you informed of offers and promotions relating to our Services and those of other entities within our group, provided that you don't "opt-out" from this option	Explicit Consent
To support any other purpose necessary for performance of our contractual obligations or specifically stated at the time at which you provided your Personal Information	Necessary for the performance of a contract

## 6. Disclosure of your Personal Information

6.1. We may, for the aforementioned Purposes, disclose your Personal Information to any of the following recipients:

6.1.1. a third party which assists us in providing our Services or which otherwise has a lawful basis to know such information;

6.1.2. any law enforcement body which may have any reasonable requirement to access your Personal Information not protected to the legal professional privilege; and

6.1.3. any regulatory body or authorised entity which may have any reasonable requirement to access your Personal Information not protected to the legal professional privilege.

6.2. If at any time you wish us to stop processing your Personal Information for the above Purposes, you should contact us and we will take the appropriate steps to stop doing so.

## 7. Transfer of your Personal Information outside of the EEA

Within our global operations, Personal Information may be transferred outside the country in which it was collected and/ or processed, for legitimate business activities in accordance with Applicable Laws. In addition, to the extent permissible by Applicable Law, we may store and/ or process Personal Information in facilities operated by third parties on our behalf outside the country in which the Personal Information was collected and/ or processed. Where Personal Information of any the European Economic Area (“EEA”) to other countries in which Applicable Laws do not offer the same level of data privacy protection as the EEA states, we take measures to provide an appropriate level of data privacy protection. For example, using approved model contractual clauses, other measures designed to ensure that the recipients and/or processors of the Personal Information protect it.

## 8. Your rights

8.1. You have the following rights in relation to your Personal Information:

8.1.1. Access: You are entitled to ask us if we are processing data in relation to you and request access to the Personal Information that we hold about you.

8.1.2. Rectification: You have the right to request correction of any inaccurate or incomplete Personal Information that we hold about you.

8.1.3. Erasure: You have the right to ask us to remove or delete Personal Information where the Personal Information in question is no longer necessary in relation to the purposes for which it was collected.

8.1.4. Restriction: You are entitled to restrict our processing of your Personal Information or to object to the processing of your Personal Information.

8.1.5. Portability: You have the right to request transfer of your Personal Information to another person (controller).

8.1.6. Objection/withdrawal of consent: where we are processing your data on the basis of consent given by you, you have the right to withdraw that consent at any time.

8.1.7. A right to complain to the Office of the Commissioner of Personal Data Protection in Cyprus, email: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy).

8.2. If you are unsure about your rights or are concerned about how your Personal Information may be processed, please contact us at [grow@grow.com.cy](mailto:grow@grow.com.cy).

8.3. If you would like to exercise any of your rights, then you can do so by contacting us as described above. Please be aware that while we will try to accommodate any request you make in respect of your rights, they are not absolute rights. This means that we may have to refuse your request or may only be able to comply with it in part.

8.4. Where you make a request in respect of your rights, we will require proof of identification. We may also ask that you clarify your request. If we receive repeated requests or have reason to believe requests are being made unreasonably, we reserve the right not to respond.

## **9. Retention of your Personal Information**

We will retain your Personal Information for the period necessary for us to provide you with our Services. Accordingly, your Personal Information will be retained for up to 5 years following the closure of your account (if applicable) or the last contact with us emanating from you. Where it is no longer necessary for us to process your Personal Information, we will delete it. Please note, however, that we may be subject to legal and regulatory requirements to keep Personal Information for a longer period, in particular pursuant to any applicable statutory limitation period. If you request that you should not be able to access our Website and Services (i.e. self-exclude), we will retain this information indefinitely.

## **10. Security**

We have taken all necessary measures to protect your Personal Information from being accidentally or unlawfully destroyed, lost, altered, disclosed, accessed or used in an unauthorized manner. Third parties processing your data in accordance with this Policy will be under the same duties.

## **I.L. GROW SUSTAINABILITY CONSULTING LTD COOKIES POLICY**

### **1. Introduction**

1.1. This Cookies Policy sets out the way in which **I.L. GROW SUSTAINABILITY CONSULTING LTD** ("we" or "us" or "our"), a company incorporated and registered in Cyprus with registration number HE 431954 uses cookies on our website [www.grow.com.cy](http://www.grow.com.cy) ("Website").

1.2. The purpose of this Policy is to explain to you:

- what the cookies are;
- main cookies that we use, and what we use them for;
- how you can restrict, block or delete cookies; and
- other useful information about cookies.

### **2. What Are Cookies**

As is common practice with almost all professional websites, our Website uses cookies, which are small text files stored on your computer when you visit certain web pages.

### **3. How We Use Cookies**

3.1. We use cookies for a variety of reasons detailed below. Unfortunately, in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to the Website. This Website is built on the Wix platform. You can read more about the Wix cookies and privacy policy [here](#).

3.2. We use cookies for important reasons, such as:

- To provide a great experience for our visitors and customers;
- To identify your registered members (users who registered to our Website);
- To monitor and analyze the performance, operation and effectiveness of our Website; and
- To ensure our Website is secure and safe to use.

3.3. The types of cookies used on this Website can be classified into one of three categories:

- **Strictly Essential Cookies:** These are essential in order to enable you to use certain features of the Website, such as submitting forms on the Website.
- **Functionality Cookies:** These are used to allow the Website to remember choices you make (such as your language) and provide enhanced features to improve your web experience.
- **Analytical / Navigation Cookies:** These cookies enable the Website to function correctly and are used to gather information about how visitors use the Website. This information is used to compile reports and help us to improve the Website. Cookies gather information in anonymous form, including the number of visitors to the site, where visitors came from and the pages they viewed.

3.4. Take a look at the table below to see which Strictly Essential and Functional Cookies are being used on the Wix platform and this Website:

Cookie Name	Purpose	Duration	Cookie Type
XSRF-TOKEN	Used for security reasons	Session	Essential
hs	Used for security reasons	Session	Essential
svSession	Used in connection with user login	2 years	Essential
SSR-caching	Used to indicate the system from which the site was rendered	1 minute	Essential
_wixCIDX	Used for system monitoring/debugging	3 months	Essential
_wix_browser_sess	Used for system monitoring/debugging	session	Essential
consent-policy	Used for cookie banner parameters	12 months	Essential
smSession	Used to identify logged in site members	Session	Essential
TS*	Used for security and anti-fraud reasons	Session	Essential
bSession	Used for system effectiveness measurement	30 minutes	Essential
fedops.logger.sessionId	Used for stability/effectiveness measurement	12 months	Essential
wixLanguage	Used on multilingual websites to save user language preference	12 months	Functional

#### **4. Analytical / Navigation Cookies**

In some special cases we also use cookies provided by trusted third parties. Our Website uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so that we can continue to produce engaging content.

For more information on Google Analytics cookies, see the official [Google Analytics page](#).

Google Analytics is Google's analytics tool that helps our Website to understand how visitors engage with their properties. It may use a set of cookies to collect information and report website usage statistics without personally identifying individual visitors to Google. The main cookie used by Google Analytics is the '\_ga' cookie. '\_ga' enables a service to distinguish one user from another and lasts for 2 years. It's used by any site that implements Google Analytics, including Google services.

In addition to reporting website usage statistics, Google Analytics can also be used, together with some of the advertising cookies, to help show more relevant ads on Google properties (like Google Search) and across the web and to measure interactions with the ads Google shows.

You can learn more about Google Analytics cookies and privacy policies [here](#).

Use of IP Addresses: An IP address is a numeric code that identifies your computer on the Internet. We might use your IP address and browser type to help analyze usage patterns and diagnose problems on this Website and to improve the service we offer to you. But without additional information your IP address does not identify you as an individual.

#### **5. Disabling Cookies**

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser's "Help" option on how to do this). Be aware that disabling cookies may affect the functionality of this and many other websites that you visit. Therefore, it is recommended that you do not disable cookies.

#### **6. Your Choice**

When you accessed this Website, our cookies were sent to your web browser and stored on your computer. By using our Website, you agree to the use of cookies and similar technologies.

#### **7. More Information**

Hopefully the above information has clarified things for you. As it was previously mentioned, if you are not sure whether you want to allow the cookies or not, it is usually safer to leave cookies enabled in case it interacts with one of the features you use on our Website. However, if you are still looking for more information, then feel free to contact us via email at [grow@grow.com.cy](mailto:grow@grow.com.cy).