
1. INTRODUCTION

We-Mix Global Ltd. (“We-Mix Global”, “the Company”, “we”, “us”, “our”) is committed to protecting Personal Data in accordance with applicable international data protection laws and global compliance standards.

This Global Privacy & Data Protection Policy (“Policy”) explains how We-Mix Global collects, processes, stores, transfers, and protects Personal Data during its international trading, procurement, logistics, and corporate activities.

This Policy applies to:

- Customers
- Suppliers and contractors
- Business partners
- Website users
- Employees and prospective employees
- Any identifiable individual whose Personal Data is processed by We-Mix Global

We-Mix Global operates under internationally recognised compliance, governance, and risk management principles consistent with:

- UK GDPR and Data Protection Act 2018
- EU GDPR
- International cross-border trade compliance standards
- ISO-aligned information governance and risk frameworks

2. DATA CONTROLLER INFORMATION

We-Mix Global Ltd.

Registered Office: 167-169 Great Portland Street, 5th Floor, London, W1W 5PF

Email: privacy@we-mixglobal.com

Data Protection Officer (DPO): Alberto Soteldo

For all data protection enquiries, subject access requests, or complaints, please contact the DPO using the details above.

3. PRINCIPLES OF DATA PROCESSING

We-Mix Global processes Personal Data in accordance with the following principles:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality
7. Accountability

Data protection compliance forms part of the Company’s broader ESG, compliance, and enterprise risk management framework.

4. CATEGORIES OF PERSONAL DATA PROCESSED

Depending on the nature of the relationship, We-Mix Global may process the following categories of Personal Data:

4.1 Identity & Contact Data

- Full name
- Job title
- Company name
- Email address
- Telephone number
- Postal address

4.2 Commercial & Transaction Data

- Contract details
- Purchase and sales records
- Payment information (processed securely via financial service providers)
- Shipping and logistics data
- Trade documentation

4.3 Financial & Compliance Data

- Bank details (where required for payment processing)
- VAT or tax identification numbers
- Due diligence and KYC documentation
- Anti-money laundering (AML) verification records

4.4 Technical & Website Data

- IP address
- Browser type and version
- Operating system
- Website usage statistics
- Cookie identifiers

4.5 Marketing & Communication Data

- Subscription preferences
- Newsletter sign-up information
- Communication records

We do not intentionally collect sensitive personal data unless required by law or regulatory obligation.

5. PURPOSES OF PROCESSING

We process Personal Data strictly for legitimate and defined business purposes, including:

1. Performing contractual obligations
2. Managing international trade transactions
3. Supplier onboarding and due diligence
4. Regulatory compliance (including AML, sanctions screening, trade controls)
5. Financial reporting and audit compliance
6. Insurance and risk management
7. Customer relationship management
8. Marketing communications (where lawful)
9. Website administration and cybersecurity
10. Legal claims, dispute resolution, and regulatory investigations

6. LEGAL BASIS FOR PROCESSING

Processing of Personal Data is based on one or more of the following lawful grounds:

6.1 Contractual Necessity

Where processing is necessary to perform a contract or enter a contract.

6.2 Legal Obligation

Where processing is required to comply with applicable laws, including:

- Tax legislation
- International trade regulations
- Customs requirements
- Anti-money laundering legislation
- Corporate reporting obligations

6.3 Legitimate Interests

Where processing is necessary for legitimate business interests, including:

- Business administration
- Risk management
- Fraud prevention
- Internal reporting
- Corporate governance

Such interests are balanced against individual rights and freedoms.

6.4 Consent

Where legally required, particularly in relation to marketing communications or cookies.

7. INTERNATIONAL DATA TRANSFERS

As an international trading company, We-Mix Global may transfer Personal Data across jurisdictions. Where Personal Data is transferred outside the UK or EEA, we ensure appropriate safeguards are implemented, including:

- UK International Data Transfer Agreements (IDTA)
- EU Standard Contractual Clauses (SCCs)
- Adequacy decisions
- Binding corporate rules (where applicable)
- Contractual confidentiality and security obligations

All transfers are subject to risk assessment within the Company's compliance and enterprise risk management framework.

8. DATA SHARING

We may share Personal Data with: Professional advisers (legal, tax, audit, insurance), Banks and financial institutions, Logistics providers and customs agents, IT service providers, Regulatory authorities, Government agencies (where legally required)

All third parties are subject to contractual confidentiality and data protection obligations. We do not sell Personal Data.

9. DATA SECURITY & CYBER RISK MANAGEMENT

We-Mix Global maintains technical and organisational security measures appropriate to the level of risk, including:

- Access control systems
- Encrypted communications where appropriate
- Secure IT infrastructure
- Data minimisation controls
- Internal data handling procedures
- Confidentiality agreements
- Incident response procedures

Data protection risk forms part of the Company's broader corporate risk register.

10. DATA RETENTION

Personal Data is retained only for as long as necessary for:

- Contractual performance
- Legal and regulatory compliance
- Tax and accounting requirements (minimum 6 years where applicable)
- Trade compliance documentation retention requirements
- Insurance and liability protection

At the end of the retention period, Personal Data is securely deleted or anonymised.

11. COOKIES & WEBSITE TRACKING

We-Mix Global uses cookies to:

- Enable website functionality
- Maintain security
- Analyse website usage
- Improve user experience

Users may control cookie settings via browser preferences. A separate Cookie Policy may provide further details where required.

12. INDIVIDUAL RIGHTS

Subject to applicable law, individuals have the following rights:

- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to object
- Right to data portability
- Right to withdraw consent

- Right to lodge a complaint with a supervisory authority

Requests must be submitted in writing to the DPO. Proof of identity may be required.

13. REGULATORY COMPLAINTS

If you are dissatisfied with our handling of your Personal Data, you may lodge a complaint with the relevant supervisory authority.

In the United Kingdom, this is: **Information Commissioner's Office (ICO)**: Website: <https://ico.org.uk>

If located in the EU, complaints may be submitted to your local supervisory authority.

14. GOVERNANCE & ACCOUNTABILITY

The Board of Directors maintains oversight of data protection compliance as part of corporate governance and ESG responsibilities.

The Data Protection Officer is responsible for: Monitoring compliance, advising management, conducting impact assessments where required, managing breach reporting procedures, overseeing data protection training, data protection compliance is reviewed annually or when regulatory changes occur.

15. DATA BREACH MANAGEMENT

In the event of a Personal Data breach, We-Mix Global will:

1. Assess the severity and risk
2. Contain and mitigate the breach
3. Notify regulators where legally required
4. Inform affected individuals when required
5. Record the incident within the Company's compliance register

16. POLICY AMENDMENTS

We-Mix Global may update this Policy periodically to reflect: Regulatory developments, Operational changes, Risk environment updates. Material changes will be published on our website with a clear effective date.

17. CONTACT

For all privacy matters:

Data Protection Officer

We-Mix Global Ltd.

Email: privacy@we-mixglobal.com

Registered Office: 167-169 Great Portland Street, 5th Floor, London, W1W 5PF

Effective Date: 30/09/24

Approved by: Board of Directors

Policy Owner: Data Protection Officer (DPO)