

Privacy policy

Effective date: 11 August 2025 | Last updated: 20 October 2026

This policy explains the limited handling of personal data by Ecco Leads ("Ecco", "we" or "us") in its commercial, contractual and financial intermediary role for client services.

1 Scope and responsibility

Ecco acts as a commercial, contractual and financial intermediary: arranging services, coordinating suppliers, managing commercial relationships, invoicing and administering payments. Client personal data means the underlying consumer, lead, campaign or other individual records involved in those services. It is distinct from the limited business administration data described below. The relevant client or controller determines the authorised purposes and use of client data. Ecco is responsible for its own business administration processing. Legal responsibilities follow actual activities and applicable law; this policy does not remove any responsibility imposed by law. Ecco does not determine the purposes or essential means of processing the underlying client personal data and does not independently decide which individuals are contacted, profiled or included in client campaigns.

2 No ownership or independent use

Ecco acquires no ownership or independent exploitation rights over client personal data. We do not use it for our own marketing, contact individuals for our own campaigns, build reusable lists, enrich profiles, sell, rent, license or otherwise commercialise it for our own purposes. Commercial fees and contractual involvement do not create such rights. Client data remains subject to the relevant controller's lawful instructions, permissions and contractual restrictions.

3 Access and storage limits

We do not routinely view, inspect or access client personal data, maintain an independent client-data database, or keep copies for our own purposes. Any exceptional access or temporary handling must be necessary, specifically authorised and limited to the contracted purpose, with access restricted to authorised persons under confidentiality obligations. It creates no independent reuse or retention right. Unsolicited client datasets must not be sent to us; if received, we restrict access and arrange secure deletion or authorised return, subject to any mandatory legal preservation requirement.

4 Providers and subcontractors

Any provider or subcontractor processing client data must act only for the contracted purpose under appropriate written instructions, confidentiality, security and retention requirements. No independent marketing, profiling, resale, pooling or unrelated reuse is permitted. Further subcontracting requires the authorisation applicable to the arrangement. Providers must support rights requests and incident handling and return or delete data when instructed or when services end, subject to mandatory law. Necessary technical storage by an authorised provider does not give Ecco an independent right to hold or exploit the data.

5 Business information and purposes

We may process names, professional roles, business contact details, signatures and necessary contracting, invoicing, payment, correspondence and compliance records. We obtain these from you, your organisation, business counterparties or authorised representatives. We use them only to establish and administer relationships, deliver contractual administration, communicate, reconcile payments, meet legal obligations and handle disputes. Please provide only information necessary for those purposes; we do not

request underlying client datasets or sensitive personal information for routine commercial administration. When our website is accessed, our hosting and security providers may process limited technical information such as IP address, browser information, timestamps and security logs solely to operate, secure and maintain the website.

6 Lawful processing and disclosure

We process business information on a basis permitted by the applicable law, such as contractual necessity, legal obligations, legal claims or consent where required. Legitimate interests are used only where recognised by the applicable law and after assessing necessity and individual rights. Required information is limited to what is needed to administer the relationship or comply with law; without it, we may be unable to contract, invoice or respond. Necessary information may be shared with authorised staff, administration and IT providers, banks, accountants, legal advisers and authorities where lawfully required. Recipients receive only what they need and appropriate confidentiality or contractual protections apply.

7 Retention and international transfers

Business records are kept only for the relationship and the periods necessary for accounting, tax, compliance, complaints and legal claims. Retention depends on the record type, applicable statutory periods and any active dispute or legal hold. When no longer needed, records are securely deleted or anonymised; copies awaiting removal from backups remain protected and are not used for unrelated purposes. Information may be processed in the UAE and other countries where authorised recipients operate. Restricted international transfers require a valid legal mechanism and any necessary safeguards. You may ask us for information about relevant recipients, destinations and safeguards.

8 Security and incidents

We apply proportionate technical and organisational safeguards, including access restrictions, confidentiality requirements and secure handling appropriate to the information and risk. Providers must apply appropriate protections. Suspected unauthorised access, loss or disclosure is investigated, contained and addressed; affected controllers, authorities and individuals are notified where required by applicable law or contract. No system is completely secure. Report suspected privacy incidents to support@eccoleads.com without sending unnecessary client personal data.

9 Your rights and requests

Depending on applicable law, you may request information, access, correction, deletion, restriction or portability, object to processing, and withdraw consent where we rely on it. Withdrawal does not affect earlier lawful processing. You may complain to the competent data protection authority. Contact support@eccoleads.com or write to our address on page 1. We may request proportionate identity or authority verification and respond within applicable legal deadlines, explaining any lawful refusal or restriction. For underlying client data, contact the relevant controller; we will assist with routing requests and fulfil any duties that apply to us.

10 Policy scope and updates

This notice concerns Ecco's intermediary activities and related business administration. It does not authorise new data uses or replace required processing agreements, transfer safeguards or client notices. Any website tracking, optional marketing or materially different processing requires the appropriate information and permissions before use. We may update this policy to reflect actual practices or legal requirements and communicate material changes where required. Changes do not retrospectively authorise incompatible use of personal data.