Emstream Limited — Privacy Policy

Oct 13, 2026 ·

This policy explains how Emstream Limited collects, uses and protects personal information, in line with the UK GDPR, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003.

Who we are

Emstream Limited ("Emstream", "we", "us") is a broker in environmental commodities, including voluntary carbon credits. We are the controller of the personal information described in this policy.

- Registered company number: 11147879
- Registered office: 1 Garrick Close, Hersham, Walton-on-Thames, England, KT12 5NY
- ICO registration number: [ICO NUMBER]
- Privacy contact: privacy@emstream.co.uk

This policy covers our clients, prospective clients, counterparties, suppliers and visitors to our website. It covers individuals acting for a company, not only private individuals.

Information we collect

Type	Examples
Contact and business details	Name, job title, employer, work email, phone number, messaging handles
Onboarding and due diligence	Identity documents, proof of address, ownership and director details, sanctions and PEP screening results
Trading information	Orders, quotes, trades, instructions, settlement and invoicing details
Communications	Emails, chat messages (e.g. WhatsApp, Bloomberg, Teams) and recorded phone calls
Website and technical data	IP address, browser type, pages visited (server logs)

Type	Examples
Marketing preferences	Whether you want to receive market updates and how

We collect this directly from you, from your employer, from public sources (such as Companies House and company websites), from screening providers, and from counterparties or platforms involved in a trade.

How we use it and why

We only use personal information where the law allows it. Each use relies on one of these lawful bases.

What we do	Lawful basis
Onboard clients and arrange, execute and settle trades	Contract, or legitimate interests where you act for a company
Identity, anti-money laundering, sanctions and fraud checks	Legal obligation, and legitimate interests in preventing financial crime
Keep records of orders, trades and communications	Legal obligation, and legitimate interests in resolving disputes
Manage our relationship, invoicing and accounts	Contract, legal obligation (tax and accounting) and legitimate interests
Send market updates and news to business contacts	Legitimate interests, or consent where required
Run, secure and improve our website	Legitimate interests
Respond to legal claims or regulator requests	Legal obligation and legitimate interests

Where we rely on legitimate interests, we have weighed them against your rights. You can ask us for details of that assessment.

We do not make decisions about you based solely on automated processing that have legal or similarly significant effects.

Call recording and monitoring

We may record phone calls and keep copies of electronic messages with clients and counterparties. We do this to keep an accurate record of orders and instructions, resolve disputes, train staff and meet our legal and compliance obligations.

Recordings are stored securely and accessed only by authorised staff. If you do not want a call recorded, please tell us and we will arrange another way to communicate, though we may not be able to take orders that way.

Who we share it with

We do not sell personal information. We share it only where needed, with:

- counterparties, exchanges, trading platforms and carbon registries involved in a trade;
- service providers who support our business, such as IT, cloud hosting, communications, screening and accounting providers, under contracts that protect your data;
- our group and associated companies, including Emsurge Limited, where they provide services to us;
- professional advisers, such as lawyers, auditors and insurers;
- regulators, law enforcement, tax authorities and courts where the law requires it;
- a buyer or investor if our business is sold or restructured, under confidentiality terms.

International transfers

Some of our service providers and counterparties are outside the UK. When we send personal information abroad, we make sure it is protected by one of these safeguards:

- the destination is covered by UK adequacy regulations (for example, the EEA);
- we use the ICO's International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses;
- the transfer is necessary to perform a trade or contract you have asked for.

Contact us for a copy of the relevant safeguard.

How long we keep it

We keep personal information only as long as we need it, then delete or anonymise it.

Information	Typical retention
Client onboarding and due diligence records	5 years after the relationship ends
Trade records, contracts and invoices	6 years after the trade or contract ends
Call recordings and messages	5 years from the date of the communication
Marketing contact details	Until you unsubscribe, or 2 years without engagement
Website server logs	Held by our website host, Wix, only as long as needed to run and secure the site

We may keep information longer if there is a legal claim, investigation or regulatory request.

Security

We use appropriate technical and organisational measures to protect personal information, including access controls, encryption, multi-factor authentication and staff training. Access is limited to people who need it for their work. If a data breach is likely to put your rights at high risk, we will tell you and the ICO as the law requires.

Your rights

Under UK data protection law you have the right to:

- access the personal information we hold about you;
- have inaccurate information corrected;
- have your information deleted in some circumstances;
- restrict how we use your information in some circumstances;
- object to our use of your information based on legitimate interests, and always to direct marketing;

- receive information you gave us in a portable format, where processing is based on consent or contract;
- withdraw consent at any time, where we rely on it.

To use any of these rights, email privacy@emstream.co.uk. We will respond within one month, and may ask you to confirm your identity. Some rights have limits, for example where we must keep records by law.

Marketing

We may send market commentary, price updates and news about our services to business contacts. You can opt out at any time using the unsubscribe link in any email, or by contacting us. Opting out will not affect messages we need to send about trades or your account.

Cookies

Our website runs on Wix and uses a small number of cookies needed for it to work and stay secure. We will ask for your consent before setting any cookie that is not strictly necessary. Details are in our cookie notice.

Complaints

If you are unhappy with how we handle your information, please contact us first at privacy@emstream.co.uk so we can try to put it right. We will acknowledge your complaint within 30 days.

You can also complain to the Information Commissioner's Office (ICO) at ico.org.uk/make-a-complaint or on 0303 123 1113.

Changes to this policy

We may update this policy from time to time. The latest version will always be on our website, with the date it was last updated at the top.