

# Data Privacy Policy

#### Our Privacy Policy and promise to you

At Quinns Consulting Limited ("Quinns"), we are committed to maintain the security and privacy of our customers' personal data. We appreciate and value how important privacy is to you and therefore we protect your information as if it were our own.

This policy will explain why we need your data, how we use it and your rights over it.

As part of respecting your rights to control your personal data, this privacy policy explains the information we collect from you, either directly or indirectly, and how we will use it. We will endeavour to ensure that any information you submit to us remains private and is only used for the purposes set out in this policy.

## Who is responsible for your data?

At Quinns, we are committed to maintaining the security and privacy of our customers' personal data. We appreciate and value how important privacy is to you and therefore we protect your information as if it were our own.

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#### What information we collect & process, and why

To enable Quinns to deliver our services for our clients effectively, we are required to process your data in a number of different ways, depending on the requirements, such as:

#### Your name and contact details

We use your name and contact details, such as email, postal address and contact number(s), to get back in contact with you so that you can tell us your question, query or feedback. We may also request your company name, if the request is on behalf of a business.

We use the same information to send you information by email or post about our services.

We will also use your name and contact details in order to perform our contract with you. Without this information, we could not provide you with our services.

## **Company/Organisation information**

To provide consulting services regarding corporate/organisational change we require to use the following data/information:

- Accounts and Financial information for Due Diligence and Organisational Operations consulting
- HR/Personnel information for coaching services as well as for Due Diligence and TUPE processes in organisational change projects
- Commercial Partner and Service contract information to support organisational change, service improvement and purchasing economies
- Organisational Governance information, where relevant, to ensure Local and National Government compliance
- Company/Personal Intellectual Property to provide consulting services in development, training and consulting projects

In any event, we are committed to ensuring that the information we collect and use is appropriate for the purpose, and does not constitute an invasion of your privacy. Under our obligations to protect your right to privacy we are required to comply with Privacy and Electronic Communications laws and Regulations and therefore we process your data in accordance with them.

Depending on the activity, we will use the following reasons to process your information:

- you have given us consent to do so;
- we are processing your information so that we can fulfil our contractual promise or agreement in providing services to you;
- we need to comply with a legal obligation;
- there is a vital interest in doing so, usually associated with safeguarding
- it is a required public task
- we have a legitimate interest to do so.

We only use your information for the purposes detailed in this policy. If there are any changes to the way we process your data we will contact you and ensure that any new processing is done in accordance with the GDPR.

#### With whom we share your data

At Quinns we believe in keeping you informed about what happens with your data to preserve our relationship of trust and confidence and therefore we do not sell any of your information to third parties. In general, we only share our customers' information with their existing partner organisations and only with their prior consent. Again, consent is required before we approach an new company or organisation during a project.

We occasionally use selected companies to provide services on behalf of our business, which may involve the processing of your personal data; however, we will only do so with your consent and only when absolutely necessary. If and when we do share your information, we ensure that all your data is treated with the same high standards as if it were our own.

#### How long is your data retained?

Quinns will only keep your personal data for as long as necessary to provide you with our services. At the end of all projects all data provided by a customer/organisation, or developed during the project and for whom the intellectual property lies with the customer, is returned. We retain commercial contract and finance/accounts information associated with the delivery of a project for the time periods required by GDPR, HMRC and Companies House.

#### How is your data kept secure?

Quinns rely on a series of people, process, physical and technological controls that help us protect your data. We store the personal data you provide us on encrypted USB Data Drives or encrypted computer systems that have access controls in place, are protected by commercial anti-virus and security software and are regularly and automatically checked for vulnerabilities so that these can be addressed prior to a malicious attack – as far as is reasonably possible. We have physical access controls in our facilities and take practical security steps when travelling and working on-site to prevent breaches in confidential information caused either through the physical loss of equipment as well as accidentally, for example, through access to an unlocked laptop or visibility of screens or documentation on public transport or in open-plan office spaces.

## Your Personal data rights

You have a great deal of rights over your personal information and at Quinns, we are committed to honouring them for you when processing your data. The next sections provide you with information on how you can request a variety of activities from us regarding your personal data.

## How can you rectify your data if it is not accurate?

If you wish to inform us of any changes, updates or corrections, to your personal data or preferences, then please contact us at

#### paul.quinn@quinnsconsulting.co.uk

or

Paul Quinn Quinns Consulting Ltd 49 The Warren Abingdon OX14 3XB

In general, we will update your records as requested; however, if we are satisfied that the data we hold are correct and accurate, we will inform you that this is the case and explain our decision. You have the right to appeal this decision and also retain the right to complain to the UK Information Commissioners Office (ICO) and the ability to seek to enforce this right through a judicial remedy.

#### How can you gain access to your personal data?

If you require access to your personal data, you have the right to request this information from Quinns by submitting a Subject Access Request. Guidance on how you can do this is provided on the Information Commissioner's Office at <a href="https://ico.org.uk/your-data-matters/your-right-to-get-copies-of-your-data/">https://ico.org.uk/your-data-matters/your-right-to-get-copies-of-your-data/</a>.

## Please direct Subject Access Requests to:

#### paul.quinn@quinnsconsulting.co.uk

or

Paul Quinn Quinns Consulting Ltd 49 The Warren Abingdon OX14 3XB

In order to process your request correctly and authenticate your identity we may request photographic identity and a proof of address. Some examples are passport or driving licence and a recent utility bill.

Once your request is received and identity verified, we will communicate back to you in writing, where appropriate by electronic means, or if requested, the information may be provided orally. The response will be within a calendar month, unless an extension is required, which in this case we will still communicate back to you within a calendar month, outlining our justification for the additional time required.

This information will be provided free of charge, unless it is manifestly unfounded or excessive, and responses will be without undue delay and within a calendar month. If we do not take action regarding your request, we will provide the reasons for not doing so. You also have the right to complain to the UK Information Commissioners Office (ICO) and the ability to seek to enforce this right through a judicial remedy.

#### How can you request the erasure of your data from our systems?

If you believe your data should be erased by Quinns, then you have the right to request this by contacting:

#### paul.quinn@quinnsconsulting.co.uk

or

Paul Quinn Quinns Consulting Ltd 49 The Warren Abingdon OX14 3XB

providing us with full details of your request, along with the rationale behind your request.

In order to correctly process and ensure you are the data subject, we will need to verify your identity, which may include a request for photographic identity and a proof of address. Some examples are passport or driving licence and a recent utility bill. We only retain data as long as necessary but will review your request accordingly and respond to you within a calendar month.

If we do not take action regarding your request to erasure, we will provide the reasons for not doing so. You also have the right to complain to the UK Information Commissioner's Office (ICO) and the ability to seek to enforce this right through a judicial remedy.

## How can you make a request for Quinns to restrict processing of your data?

You have the right to request that Quinns process your data on a restricted basis in certain circumstances.

## You can make a request to restrict processing of your personal data, by providing full details and reasons for your request to

paul.quinn@quinnsconsulting.co.uk

or

Paul Quinn Quinns Consulting Ltd 49 The Warren Abingdon OX14 3XB

In order to correctly process and ensure you are the data subject, we may need to verify your identity, which may include a request for photographic identity and a proof of address. Some examples are passport or driving licence and a recent utility bill. We will automatically restrict processing whilst we consider the accuracy of the data or the legitimate grounds for processing it, in line with your rights.

If we do not take action regarding your request to restrict processing, you have the right to complain to the UK Information Commissioners Office (ICO) and to a judicial remedy.

## How can you move, copy or transfer personal data to another provider?

You have the right to data portability which allows you to move, copy or transfer your personal data from one IT environment to another in a safe and secure way without any interruption to usability.

You can make a request to move, copy or transfer your personal data by providing full

details of your request to

paul.quinn@quinnsconsulting.co.uk

or

Paul Quinn Quinns Consulting Ltd 49 The Warren Abingdon OX14 3XB

To correctly process and ensure you are the data subject, we may need to verify your identity, which needs to be a photographic identity and a proof of address. Some examples are passport or driving licence and a recent utility bill.

This information will be provided free of charge, unless it is manifestly unfounded or excessive, and responses will be without undue delay and within a calendar month. If we do not take action regarding your request to data portability, you also have the right to complain to the UK Information Commissioners Office (ICO) and the ability to seek to enforce this right through a judicial remedy.

#### How do you object to Quinns processing your data?

You have the right to object to the processing of your personal data in a range of specified circumstances.

Your objection must be based on your particular situation and unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or we are processing the data for the establishment, exercise or defence of legal claims, we will stop processing your personal data.

Where your personal data are processed for direct marketing purposes, this right is absolute, and we will cease processing on receipt of an objection without exception. You can make an objection to us processing your personal data by providing full details of your request to

#### paul.quinn@quinnsconsulting.co.uk

or

Paul Quinn Quinns Consulting Ltd 49 The Warren Abingdon OX14 3XB

In order to correctly process and ensure you are the data subject, we may need to verify your identity, which needs to be a photographic identity and a proof of address. Some examples are passport or driving licence and a recent utility bill.

This information will be provided free of charge with responses being made without undue delay and within a month.

## How can you raise a concern or make a complaint?

We are always interested in what our customers have to say, good or bad. If you wish to provide us with any feedback regarding this policy, have a complaint or wish to exercise any of your rights listed above, please contact us at Quinns via

#### paul.quinn@quinnsconsulting.co.uk

or

Paul Quinn Quinns Consulting Ltd 49 The Warren Abingdon OX14 3XB

Alternatively, if you are not satisfied with our response, you can contact our supervisory authority, which is the United Kingdom, Information Commissioner's Office (ICO) who can be contacted directly at <a href="https://ico.org.uk/">https://ico.org.uk/</a> or on 0303 123 1113

## Cookies and website analytics

Quinns has disabled the use of Traffic, Analytic and 3<sup>rd</sup> Party Advertising cookies on their website. Any remaining cookies are inserted by our hosting company Squarespace purely to allow the functionality of the website.

## **Changes to our Privacy Policy**

We may occasionally make alterations to this page which will reflect how we process and look after your data. This is to ensure our commitment to you in protecting your information and upholding your rights. If important changes are made to this policy, we will draw your attention to them by making this clear on our website, through our services or by another means of communication, such as email. This will allow you to assess the changes and make an up-to-date decision if you would like to continue using our services.