

# **PRIVACY POLICY**

## WHO WE ARE

We are TQS Limited (registered in England and Wales under company registration number 02697706) and TQS SE Limited (registered in England and Wales under company registration 02689256) are the controller and responsible for your personal data (collectively referred to as “TQS Limited”, “TQS SE Limited”, “Company”, “we”, “us” or “our” in this privacy policy).

Our contact details for both TQS Limited and TQS SE Limited is:

Highland Court Farm,  
Bridge,  
Kent, CT4 5HW

Email address: [privacy@tqsltd.co.uk](mailto:privacy@tqsltd.co.uk)

## COMPLAINTS

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO. Therefore, please contact our Data Protection Officer (details above) in the first instance.

## YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes postal addresses, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, network data, your login data, operating system and platform and other technology on the devices you use.

## HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

### Direct interactions

You may give us personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- apply for a job.

## **Service Interactions**

As you interact with our Services/Products, certain personal information may be collected such as unique device ID's, device IP addresses, login information (username and password), one-time passcodes and user location.

## **FOR WHAT PURPOSE WILL WE USE YOUR PERSONAL DATA?**

Most commonly, we will use your personal data in the following circumstances:

Where we need to perform the contract we are about to enter into or have entered into with you;  
Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests;

Where we need to comply with a legal or regulatory obligation;

To assess your suitability for employment and process your application;

For customer support and training;

To solicit feedback;

To identify devices used in conjunction with our products and services;

To enforce security features within our products and services;

To verify identity, particularly when requesting changes to services/products.

## **LAWFUL BASIS FOR COLLECTION OF YOUR PERSONAL DATA**

We shall ensure that we have a lawful basis for collection of personal data, namely either:

(i) Where we need it to perform a contract we are about to enter into, or have entered into, with you;

(ii) Where we need to comply with a legal or regulatory obligation;

(iii) Where it is necessary for our legitimate interests, including, but not limited to: keeping our records updated and to study how customers use our products/services/websites, to define types of customers for our products and services, to keep our website updated and relevant, to develop and grow our business, to develop our products/services, running our business, provision of administration and IT services, network security, to prevent fraud and/or assess whether to enter into a contract with you; or

(iv) Where you have given consent.

## **DISCLOSURES/SHARING OF YOUR PERSONAL DATA**

We may need to disclose/share your personal data with the parties set out below for the purposes set out above.

Our customer relationship management software providers, email platforms, Web site hosting providers, backup software;

our human resources information system provider and our background check service providers;

professional advisers including solicitors, bankers, auditors and insurers based in the UK

We also reserve the right to use or disclose information provided if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud and/or to comply with a judicial proceeding, court order, legal process or other governmental authority; provided, however, that unless prohibited by law, TQS Limited will use its reasonable efforts to give you notice to enable you to seek a protective order or take other appropriate action.

## DATA SECURITY

We have put in place appropriate technical and organisational measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## HOW LONG WILL WE HOLD YOUR PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We keep information on unsuccessful employment applications for six (6) months in case another alternative role becomes available that we think you may be suitable for.

We retain prospective customer data for which we obtained explicit consent for twelve (12) months after which time we will seek to renew consent.

We keep basic personal data about our customers for the duration of your business relationship with us and thereafter as required for legal and audit purposes.

We retain testimonials until withdrawn at your request.

We retain personal information linked to service support requests indefinitely because historical data about service issues is always relevant to service development.

In some circumstances you can ask us to delete your data. Please contact [privacy@tqsltd.co.uk](mailto:privacy@tqsltd.co.uk) with any requests.

## YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data, such as:

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to

processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact our Data Protection Officer (see contact details above) or email [privacy@tqsltd.co.uk](mailto:privacy@tqsltd.co.uk).

## **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. The TQS Limited Subject Access Request Form available [here](#) gives the format for requests

## **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you by email and keep you updated.