



Data policy

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1. Key Definitions

Candidate: individuals interested in our company, in our activities or projects, who have applied for our jobs or have been contacted by our recruitment or sales teams. Those individuals could be potentially onboarded in our company or are already in a recruitment process with us. By Candidate, we also include, individuals running their own business or working for an umbrella company who are interested to provide services on behalf of Quanteam UK.

Cookie: A cookie is a text file stored on your computer. Cookies store bits of information that we use to help make our site work. They can't run any code and don't contain viruses. No one can read our cookies except us.

Data controller: "Controller" means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of processing are determined by EU or Member State laws, the controller (or the criteria for nominating the controller) may be designated by those laws.

Personal data: Personal data means data that relates to a living individual that can be identified from those data, or from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

Processing: Processing, in relation to information or data, means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including organisation, adaptation or alteration of the information or data, retrieval, consultation or use of the information or data, disclosure of the information or data by transmission, dissemination or otherwise making available, or alignment, combination, blocking, deletion or destruction of the information or data.

Sensitive Personal data: Sensitive personal data means personal data consisting of information as to

- the racial or ethnic origin of the data subject,
- their political opinions,
- their religious beliefs or other beliefs of a similar nature,
- their membership of a trade union (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992),
- their physical or mental health or condition,



- their sexual life,
- any proceedings for any offence committed or alleged to have been committed by them, the disposal of such proceedings or the sentence of any court in such proceedings.

Staff: means Employee of Quanteam UK and Suppliers who are providing consultancy services related to our core business.

Supplier: Independent organization which provides something needed such as a product or service to Quanteam UK. This term can also include companies which are providing services on behalf of Quanteam UK (i.e non-permanent Staff).

2. Introduction

Quanteam UK is committed to safeguarding the privacy of individuals we work with. This can include customers, Suppliers, business contacts, Employees and other people the organisation has a relationship with or may need to contact.

This policy applies where we are acting as a data controller with respect to personal data of individuals. This Privacy Policy explains what Quanteam UK does with your personal data, whether we are in the process of helping you find a job, continuing our relationship with you once we have offered you a role, providing you with a service, receiving a service from you, using your data to ask for your assistance in relation to one of our Candidates or Employee, or you are visiting our website.

This policy describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you.

This privacy policy applies to:

- The Head Office of Quanteam UK
- All branches of Quanteam UK
- All Staff and volunteers of Quanteam UK
- All contractors, Suppliers and other people working on behalf of Quanteam UK
- Clients

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the “GDPR”), the company responsible for your personal data is Quanteam UK.



3. Why this policy exists

The goal of this data protection policy is to depict the legal data protection aspects in one summarising document. This is not only to ensure compliance with the European General Data Protection Regulation (GDPR) but also to provide proof of compliance.

This data protection policy ensures that Quanteam UK:

- Complies with data protection law and follows good practices standards
- Protects the rights of Staff, customers and partners
- Protects itself from some data security related risks such as:
 - Breaches of confidentiality i.e. information being given out inappropriately
 - Failing to offer choice i.e. all individuals should be free to choose how the company uses data relating to them.
 - Reputational damage i.e. the company could suffer if hackers successfully gained access to sensitive data

4. Data Controller

Any personal information provided to or gathered by Quanteam UK is controlled by Quanteam UK at Suite 178 – 3-7 Temple Avenue EC4Y 0HP London.

5. Responsibilities

Everyone who works for or with Quanteam UK Ltd has some responsibility for ensuring data is collected stored and handled appropriately. Each team that handles data must ensure that it is handled and processed in line with this policy and data protection principles.

The director is ultimately responsible for ensuring that Quanteam UK meets its legal obligations.

6. Our legal bases for processing your data

a- Legitimate Interests

According to the Article 6(1)(f) of the GDPR, we can process your data where it “is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data.”



The following activities enable us to deliver a tailored, efficient service. You have the right to object to us processing your personal data, details of which are contained in paragraph 18, page 22 “contact and complaint”.

b- Candidates & Employees

We think it’s reasonable to expect that if you are looking for employment or have posted your professional CV information on a job board or have responded to a job ad we posted on a professional networking site, you are happy for us to collect and use your personal data, share that information with prospective or current Client and assess your skills. We have to make sure our business runs smoothly, so that we can carry on providing services to Candidates like you. We therefore also need to use your data for our internal administrative activities, like payroll and invoicing where relevant to ensure you get paid.

We have our own obligations under the law, so it is a legitimate interest of ours to insist on meeting. If we believe in good faith that it is necessary, we may therefore share your data in connection with crime detection, tax collection or actual or anticipated litigation.

For some administrative, HR and payroll related purpose, we use and process data of our Employees.

c- Clients:

To ensure that we provide you with the best service possible, we store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of our conversations, meetings, requirements and services provided.

d- Suppliers:

We use and store the personal data of individuals within your organisation in order to facilitate the receipt of services from you as one of our Suppliers. We also hold your financial details, so that we can pay you for your services. We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.

e- Other Users, such as Referees and Emergency Contacts:

If you have been put down by a Candidate, an Employee or a prospective member of Staff as one of their Referees, we use your personal data in order to contact you for a reference.

If a Candidate or Staff member has given us your details as an Emergency Contact, we will use these details to contact you in the case of an accident or emergency only.



7. What personal data do we collect

We collect personal data of our workers, Candidates, Suppliers, business contacts, shareholders and website Users. We will always try to give individuals appropriate notice of what data will be collected and how it will be used. Whatever happens, we will only process that data if we consider it fair and lawful to do so.

a- Candidate

In order to provide the best possible work opportunities that are tailored to you, we need to process certain information about you.

Depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the information listed below to enable us to offer you work opportunities which are relevant to you. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will not process the data in those jurisdictions:

- Name; Age/date of birth; Sex/gender; Photograph; Marital status; Contact details including home address, email, phone number;
- Education details, Employment history; Details about your current remuneration, pensions and benefits arrangements;
- Emergency Contacts and details of any dependants; and if applicable Referee details;
- Nationality/citizenship/place of birth; Immigration status (whether you need a work permit);
- A copy of your driving licence and/or passport/identity card;
- Financial information (where we need to carry out financial background checks);
- National Insurance Number and any other tax-related information; and Bank Account details
- Diversity information including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information;
- Details of any criminal convictions if this is required for a role that you are interested in applying for;
- Information on your interests and needs regarding work related opportunities, both collected directly and inferred, for example from jobs viewed or articles read on our website;
- Extra information that you choose to tell us;
- Extra information that your Referees chooses to tell us about you;
- Extra information that our Clients may tell us about you, or that we find from other third party sources such as job portals
- IP address; The dates, times and frequency with which you access our services; and
- CCTV footage if you attend our premises.

**Please note that the above list of categories of personal data we may collect is not exhaustive.*



b- Clients

We usually only need to have your contact details or the details of individual contacts within your organisation (such as their names, telephone numbers and email addresses) to ensure that our relationship runs smoothly. We use information about individuals in your organisation, in the course of providing you Consultancy Services.

Depending on the relevant circumstances, we may collect some or all of the information listed below to enable us to provide you with our services:

- Name
- Job title
- Contact details
- Reporting Line
- Scope of responsibilities
- Any other relevant information you may share with us.

c- Suppliers:

Usually all we require is contact details of relevant individuals at your organisation so that we can communicate with you, such as names, telephone numbers and email addresses. We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us). In addition, for Suppliers providing us consultancy services, we will also require some information about the Staff supplied. This can include the list defined in the paragraph "Candidate".

d- Other Users, such as Referees and Emergency Contacts:

In order to provide Candidates and Staff with suitable work opportunities, we require some basic background information. We only ask for very basic contact details, so that we can get in touch with you either for a reference or because you've been listed as an Emergency Contact for one of our Candidates or Staff members.

e- Website Users:

We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, your IP Address, the frequency with which



you access our website, your browser type, the location you view our website from, the language you choose to view it in and the times that our website is most popular. This information is called “Cookie”.

8. How do we collect your personal data?

We collect personal data in three ways:

- Personal data that we receive directly from you;
- Personal data that we receive from other sources; and
- Personal data that we collect automatically.

a- Candidates:

There are two main ways in which we collect your personal data:

- Directly from you; and
- From third parties via the following methods:
 - a. Personal data that we receive from other sources; and
 - b. Personal data that we collect automatically.

We need to know certain information about you in order to provide a tailored service. This will enable us to provide you with the best opportunities and should therefore save you time hearing about roles that are not relevant to you.

There are numerous ways you can share your information with us. It all depends on what suits you. These may include:

- Entering your details on Quanteam UK website;
- Emailing your CV to a Quanteam UK team member or being interviewed by them;
- Applying for jobs through job boards; which Quanteam UK has an access to.
- Depending on the relevant circumstances, these may include personal data received in the following situations:
 - Your Referees may disclose personal information about you;
 - Our Clients may share personal information about you with us;
 - We may obtain information about you from searching for a potential Candidate from third party sources, such as LinkedIn and other job sites;
 - If you ‘follow’ us on Twitter or on LinkedIn we will receive your personal information from those sites



b- Clients

We will receive data directly from you in two ways:

- Where you contact us proactively, usually by phone or email; and/or
- Where we contact you, either by phone or email, or through our consultants' business development activities more generally.

Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your colleagues from other sources generally by way of due diligence or other market intelligence including:

- From third party market research and by analyzing online and offline media (which we may do ourselves, or employ other organizations to do for us); and
- From other limited sources and third parties (for example from our Candidates to the extent that they provide us with your details to act as a Referee for them).

c- Other Users, such as Referees and Emergency Contacts

We collect your contact details only where a Candidate or a member of our Staff puts you down as their Emergency Contact or as a Referee.

9. How do we use your personal data?

a- Candidates:

The main reason for using your personal details is to help you offer you an employment or a project that may be suitable for you. The more information we have about you, your skillset and your ambitions, the more we can tailor our services to your requirements. We may also use your personal data for things like marketing, profiling and diversity monitoring. Where appropriate, we will seek your consent to undertake some of these activities.

We generally use Candidate data in four ways:

- Consultancy Services Activities for our Clients;
- Marketing Activities;
- Equal Opportunities Monitoring; and more globally HR Studies.
- To help us to establish, exercise or defend legal claims.



a. Consultancy Services Activities

Our main area of work is providing Consultancy Services. We've listed below various ways in which we may use and process your personal data for this purpose. Those ways of data process are covered by our legitimate interests:

- Collecting your data from you and other sources, such as social media and job portals;
- Storing your details (and updating them when necessary) on our internal database, so that we can contact you in relation to our core activities;
- Assessing data about you for work opportunities which we think may be suitable for you;
- Carrying out our obligations arising from any contracts entered into between Quanteam UK and any third parties in relation to your recruitment;
- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties;

**Please note that this list is not exhaustive.*

b. Marketing Activities

We may periodically send you information that we think you may find interesting, or to ask for your help with connecting with other Candidates. In particular, we may wish to use your data for the purposes to enable us to develop and market our services

We need your consent for some aspects of these activities which are not covered by our legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) and, depending on the situation, we'll ask for this via an opt-in or soft-opt-in.

For most people, this is beneficial as it allows us to suggest other jobs to you alongside the specific one you applied for, significantly increasing the likelihood of us offering you a new position. For other types of e-marketing, we are required to obtain your explicit consent.

1. Equal opportunities monitoring and other sensitive personal data

We are committed to ensuring that our recruitment processes are aligned with our approach to equal opportunities. Some of the data we may (in appropriate circumstances and in accordance with local law and requirements) collect about you comes under the umbrella of "diversity information". This could be information about your ethnic background, gender, disability, age, sexual orientation, religion or other similar beliefs, and/or social-economic background. Where appropriate and in



accordance with local laws and requirements, we'll use this information on an anonymized basis to monitor our compliance with our equal opportunities policy.

This information is what is called 'sensitive' personal information and slightly stricter data protection rules apply to it. We therefore need to obtain your explicit consent before we can use it. We'll ask for your consent by offering you an opt-in. This means that you have to explicitly and clearly tell us that you agree to us collecting and using this information.

We may collect other sensitive personal data about you, such as health-related information, religious affiliation, or details of any criminal convictions if this is appropriate and is required for a role that you are interested in applying for. We will never do this without your explicit consent.

2. Profiling

Although at present all our consulting and recruitment activities involve human-decision making during the process, we may in the future use fully automated technologies such as expert systems or machine learning to complete a Candidate selection process from end-to-end, where appropriate and in accordance with any local laws and requirements.

Where appropriate, we will seek your consent to carry out some or all of these activities. If you do not provide consent to profiling, your application will continue to be reviewed manually for opportunities you apply for, but your profile will not be automatically considered for alternative roles. This is likely to decrease the likelihood of us successfully offer you an employment opportunities.

b- Clients

a. Consultancy Services Activities

Our main area of work is providing Consultancy Services. We've listed below various ways in which we may use and process your personal data for this purpose. Those ways of data process are covered by our legitimate interests:

- Collecting your data from you and other sources, online and in business meetings
- Storing your details (and updating them when necessary) on our internal database, so that we can contact you in relation to our core activities;
- Carrying out our obligations arising from any contracts entered into between us;
- Carrying out our obligations arising from any contracts entered into between Quanteam UK and any third parties;
- Facilitating our invoicing process;



- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties.

*Please note that this list is not exhaustive.

b. Marketing Activities

We may periodically send you information that we think you may find interesting.

We need your consent for some aspects of these activities which are not covered by our legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) and, depending on the situation, we'll ask for this via an opt-in.

c- Staff

We may use and process your personal data in order to provide Consultancy Services to our Clients. Those ways of data process are covered by our legitimate interests:

- Storing your details (and updating them when necessary) on our internal database, so that we can contact you in relation to our core activities;
- Sending your information to Clients, in order to assess your eligibility to provide the services requested by our Client.
- Carrying out our obligations arising from any contracts entered into between us;
- Carrying out our obligations arising from any contracts entered into between Quanteam UK and any third parties in relation to your recruitment;
- Facilitating our payroll and invoicing processes;
- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties;

10. Who do we share your personal data with?

Any information collected will not be sold, shared, or rented to others in ways different from what is disclosed in this privacy statement.

Where appropriate we may share your personal data, in various ways and for various reasons, with the following categories of people:

- Any of our group companies,
- Individuals and organizations who hold information related to you,



- Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data,
- Third party service providers who perform functions on our behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT Services,
- Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place,
- In the case of Candidates and prospective members of Staff's Referees: third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate.

a- Candidates:

We may share your personal data with various parties, in various ways and for various reasons. We may share your information with prospective Clients to increase the chance to offer you the most relevant project.

Unless you specify otherwise, we may also share your information with any of our group companies and associated third parties such as our service providers where we feel this will help us to provide you with the best possible service. (For example, for a background screening purpose we may share your personal data with our Screening Services provider.)

b- Clients:

We will share your data to ensure that we provide you services with a suitable pool of Candidates, Employees or Contractors.

c- Suppliers:

We may share your information with any of our group companies and organisations to whom we provide services.

11. How do we safeguard your personal data?

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.



If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately at Data@Quanteam.co.uk.

12. International transfer

The GDPR imposes restrictions on the transfer of personal data outside the European Union, to third countries or international organisations. These restrictions are in place to ensure that the level of protection of individuals afforded by the GDPR is not undermined.

Your Personal data may only be transferred outside of the EU in compliance with the conditions for transfer set out in Chapter V of the GDPR.

Transfers may be made where the Commission has decided that a third country, a territory or one or more specific sectors in the third country, or an international organisation ensures an adequate level of protection.

We may transfer personal data where the organisation receiving the personal data has provided adequate safeguards. Individuals' rights must be enforceable and effective legal remedies for individuals must be available following the transfer.

13. How long do we keep your personal data for?

We will delete your personal data from our systems if we have not had substantial contact with you (or, where appropriate, the company you are working for or with) for a period of five years.

We will delete your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

For those Candidates whose services are provided via a third party company or other entity, "substantial contact" with you means substantial contact with the company or entity which supplies your services. Where we are notified by such company or entity that it no longer has that relationship with you, we will retain your data for no longer than five years from that point or, if later, for the period of five years from the point we subsequently have substantial contact directly with you.

When we refer to "substantial contact", we mean, for example, communication between us (either verbal or written), or where you are actively engaging with our services. If you are a Candidate we



will consider there to be substantial contact with you if you submit your updated CV onto our website. We will also consider it substantial contact if you communicate with us about potential roles, either by verbal or written communication or click through from any of our marketing communications. Your receipt, opening or reading of an email or other digital message from us will not count as substantial contact – this will only occur in cases where you click-through or reply directly.

14. How can you access, amend or withdraw the personal data that you have given to us?

GDPR's main objective is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy.

This means that you retain various rights in respect of your data, even once you have given it to us. As detailed below:

*To get in touch about these rights, please contact us. We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). *Please note that we may keep a record of your communications to help us resolve any issues which you raise.*

The GDPR provides the following rights for individuals:

a) The right to be informed

The data subject shall have the right to obtain from Quanteam UK confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data. The data subject can ask to Quanteam UK at any time information about the personal data we handle.

b) The right to rectification

The data subject shall have the right to obtain from Quanteam UK without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.



c) The right to be forgotten

The data subject shall have the right to obtain from Quanteam UK the deletion of personal data concerning him or her without undue delay and Quanteam UK shall have the obligation to erase personal data without undue delay specifically if the data subject withdraws consent on which the processing is based, or if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; or the personal data have been unlawfully processed; or if the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which Quanteam UK is subject. (Non exhaustive list – See article 17).

d) The right to restrict processing

Individuals have the right to request the restriction or suppression of their personal data at any time. This is not an absolute right and only applies in certain circumstances such as in the case of the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; or the processing is unlawful and the data subject opposes the deletion of the personal data and requests the restriction of their use instead for example.

e) The right to data portability

- The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.
- It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

Quanteam UK will respond to any request without undue delay, and within one month.

f) The right to object

Individuals have the right to object at any time to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics

g) Rights in relation to automated decision making and profiling.

Individuals will have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. If automated decision making and profiling are based on the individual explicit consent and are necessary for entering into, or performance of, a contract between the data subject



and a data controller, then the data controller shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.

15. What are cookies and how do we use them?

A "cookie" is a bite-sized piece of data that is stored on your computer's hard drive. They are used by nearly all websites and do not harm your system. We use them to track your activity to help ensure you get the smoothest possible experience when visiting our website. We can use the information from cookies to ensure we present you with options tailored to your preferences on your next visit. We can also use cookies to analyse traffic and for advertising purposes.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

Most web browsers will accept cookies but if you would rather we didn't collect data in this way you can choose to accept all or some, or reject cookies in your browser's privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all our website's features. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

Cookies can also be categorized as follows:

- **Strictly necessary cookies:** These cookies are essential to enable you to use the website effectively, such as when applying for a job, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
- **Performance cookies:** These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.
- **Functionality cookies:** These cookies allow our website to remember choices you make (such as your Users name, language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.



16. Keeping information secure

We invest significant resources to protect your personal information, from loss, misuse, unauthorised access, modification or disclosure. However, no internet-based site can be 100% secure and so we cannot be held responsible for unauthorised or unintended access that is beyond our control.

17. Updates

We keep this Policy under regular review and update it from time to time.

18. Contact and complaint

Please note we will only use your information in accordance with this Policy, or where we are required or authorised by law to disclose your information to others, or have your permission to do so.

If you have any questions about this Policy, or would like to exercise your rights with respect to your personal information, please contact us on Data@Quanteam.co.uk

We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled).

If you're still unhappy with our response or if you need any further advice you should contact the Information Commissioner's Office (ICO).

ICO helpline

Telephone: 0303 123 1113

[Find out about call charges](#)