

## **OUR POLICY**

QiO Technologies Ltd is committed to respecting privacy and protecting personal information.

This Privacy Notice comes into effect from 25 May 2018 in accordance with the new General Data Protection Regulations.

We've written this Privacy Notice to advise how we use your personal information. In it, we explain the types of personal information we collect, how we collect it, what we use it for and who we may share personal information with.

This Privacy Notice applies to all personally identifiable information we process in connection with your relationship with us.

The General Data Protection Regulations (GDPR) is comprehensive European data protection legislation which comes into effect 25th May 2018. The legislation provides significant data rights for EU citizens and has a wide-ranging impact on companies inside the EU. However, it is a global issue and companies outside of the EU who collect or processes data on EU citizens will also need to comply.

In short, the GDPR is a regulation that the European Union intended to harmonize data protection and data privacy laws throughout the member states of the EU.

We believe all individuals have the right to these standards of protection and are therefore applying these principles globally.

## **CHANGES TO THIS NOTICE**

This Privacy Notice was created on 9th May 2018 and updated on 3<sup>rd</sup> May 2019.

It is important that the personal data we hold about data subjects is accurate and current. Data subjects should keep us informed if their personal data changes during our relationship.

## **IMPORTANT INFORMATION AND QiO'S ARRANGEMENTS FOR DATA PRIVACY**

This Privacy Notice aims to give data subjects information about how QiO collects and processes their personal data through their interaction with us, including data that may be provided through our website when they subscribe to newsletters or make an inquiry.

### **Controller**

QiO Technologies Ltd is the data controller for the purposes of the General Data Protection Regulations (GDPR).

### **Processor**

QiO Technologies Ltd is the data processor for the purposes of the General Data Protection Regulations (GDPR).

### **Data Subject**

Any individual who uses our website, subscribes to our newsletters, submits their details through the contact us form or who otherwise make contact with QiO.

We have appointed a Data Protection Officer who can be contacted on [dataprotection@qio.io](mailto:dataprotection@qio.io)

### **Opting Out**

Data subjects have the right to remove their data should they so wish. As a subscriber to our newsletter you can do this by clicking unsubscribe on the last email you received from us. We can also remove your data at your request via email within 72 hours of receipt.

Data subjects have the right to complaint regarding data protection issues at any time to the Information Commissioners Office (ICO), however QiO take matters of data privacy seriously and would appreciate the chance to deal with any concerns before the data subject approaches the ICO.

## **WHEN AND HOW DO WE COLLECT PERSONAL DATA?**

We will only use personal data of data subjects when the law permits, and we will use all such personal data in accordance with this Privacy Notice and General Data Protection Regulations.

By subscribing to our newsletter for example, this allows us to collect your data which is held by a secure third-party system. We are not responsible for their Privacy Notices; however, we have collected copies of their Privacy Policies to be assured that they are GDPR compliant. This includes data, which is coming from, processed or stored outside of the EU.

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

### **Direct Interactions**

The data subject may give us their personal data by filling in forms online or by corresponding with us by post, phone, email or by face to face meetings.

### **Automated Technologies or Interactions**

As a data subject interacts with our website, we may automatically collect Technical Data about their equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

### **Third-Party Sources**

We may solicit third-parties to collect personal data on our behalf (such as social media platform providers) and in such cases we instruct those third-parties to comply with this Privacy Notice and all applicable data protection laws. If we directly combine information from third-parties with personal data that we have collected, we will treat the combined information as personal data and handle it in accordance with this Notice.

## **WHAT TYPES OF PERSONAL DATA DO WE COLLECT?**

This Privacy Notice covers all personal information that we collect, store or process in connection with your relationship with QiO Technologies Ltd. By "Personal Information" we mean information

about you where you are, or could be, identified, such as your name, contact details, your IP address and other information which could be personally identifiable.

As an individual, company, business partner or other third-party personal information may be collected during our relationship and we will keep this information about you for up to six years after our relationship has ended.

### **Personal Details**

Including your name, email address or contact details

### **Monitoring**

We also collect, use and share aggregated data such as statistical data. Aggregated data may be derived from a data subjects' personal data but is not considered personal data in law as this data does not directly or indirectly reveal their identity. For example, we may use data to calculate the percentage of users accessing a specific webpage or website feature.

We do not collect any Special Categories of Personal Data (such as race, ethnicity, religious beliefs, political opinions, sexual orientation etc.) from your use of our website, subscription or any contact with QiO.

## **WHAT DO WE USE YOUR PERSONAL DATA FOR?**

- To communicate with you.
- For the development and provision of products and services.
- To give effect to the contractual relationship between you and us.

### **We will only process your data in order to fulfil the specific purposes that it was collected.**

We only process personal data if we have a lawful basis to do so. The lawful basis that we rely upon are as follows:

- Where it is necessary to perform the contract.
- Where it is necessary to comply with a legal obligation.
- Where it is necessary for our legitimate interests.
- Where you have consented to the processing.

### **Purposes for which we will use personal data:**

<b>Purpose/Activity</b>	<b>Lawful basis</b>
Newsletter Subscription	You consented to giving us your data for the purposes of receiving our newsletter
Registration of you or the business you represent as a new customer	<ul style="list-style-type: none"><li>- Legitimate Interest</li><li>- Performance of a contract</li></ul>
To manage our relationship with existing customers	<ul style="list-style-type: none"><li>- Legitimate Interest</li><li>- Performance of a contract</li></ul>
Use of data analytics to improve our website, products or marketing	<ul style="list-style-type: none"><li>- Legitimate Interest</li></ul>

## **WHO DO WE SHARE YOUR PERSONAL DATA WITH?**

Your personal information may be shared within the group of companies controlled by our parent company, QiO Technologies Ltd and its subsidiaries and branches.

We will share your personal data with third-party systems such as CRM or call answering services.

We will never have, and never will sell your data or use it for any other purpose outside of this Privacy Notice.

## **DATA RETENTION**

We will only retain personal data for as long as necessary to fulfil the purposes that it was collected.

Data subjects have the right to remove their data should they so wish. As a subscriber to our newsletter you can do this by clicking unsubscribe on the last email you received from us. We can also remove your data at your request via email within 72 hours of receipt.

By law we have to keep basic information about our customers, after they cease being our customers for six years for tax purposes.

In some circumstances we may anonymise personal data for research and statistical purposes in which case we may use this information indefinitely without further notice to the original data subject.

## **DATA SUBJECTS LEGAL RIGHTS**

Under certain circumstances, the data subject has rights under data protection laws in relation to their personal data.

If you would like to exercise any of these rights, please email [dataprotection@qio.io](mailto:dataprotection@qio.io)

- Requesting access to the personal data we hold about you.
- Requesting correction to the personal data we hold about you.
- Requesting removal of the personal data we hold about you.
- Requesting restrictions to processing of your personal data.
- Withdrawing your consent.