

# CQS (Certified Quality System) Ltd Privacy Policy

## Introduction

This privacy policy (“**Policy**”) describes the types of personal data you provide and/or CQS (Certified Quality Systems) Ltd use for the purposes of marketing or servicing our agreement with you and what we may do with that personal data and your rights.

CQS (Certified Quality Systems) LTD are Data Controllers of personal data collected by, or which you provide through our website, contractual agreement or information sharing and for the purpose of the GDPR (“**Data Protection Law**”).

References to “**we**”, “**us**” and “**our**” in this policy are all references to CQS (Certified Quality Systems) Ltd, who’s data protection registration number is ZA058403.

‘Personal data’ is defined in the GDPR and is essentially information from which an individual person can be identified (Personal Identifiable Information - PII). By submitting information and/or continuing to use the website, contractual agreement or information sharing, you signify your consent to us using your personal data in accordance with the below.

We may need to change the terms of this Policy from time to time and changes will be posted on this page (and/or where appropriate, otherwise notified to you). Your continued use of the Website will be deemed to be acceptance of amendments we make. This Policy was last updated on 24<sup>th</sup> May 2018.

## How we use your personal data

Use of services accessed through the website, contractual agreement or information sharing may require you to provide specific types of information.

We request that the information you provide is as accurate as possible as this allows us to secure your privacy in relation to registered services. Periodically we may send you an email asking you to “Update your Details”.

We use information about you for the following purposes:

1. Contact following enquiry
2. Our Services, Products and Advice; in order to fulfil our contract with yourselves
3. Accounting Payments and Finance
4. To comply with legislation
5. Suppression data (in order to not contact you if you have requested this).

We may also supplement the information that you provide with other information that we obtain from our dealings with you.

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In addition, we reserve the right to perform statistical analysis of user behaviour and characteristics to measure interest in and use of the various areas of the website and to ascertain the number of users that have visited particular web pages.

## Marketing Information

We do not sell, rent, or otherwise provide personally identifiable information to third-parties.

From time to time we would like to contact you to tell you more about the offers, services, products and other initiatives available to you.

We will only contact you if you have consented to this. However, if you are an existing customer (and have opted to receive communications) we may contact you about offers, services, products and initiatives similar to those you have previously received or enquired about (unless you have chosen not to receive such communications).

If, at any time after registering, you would like to change your preference and opt-in or opt-out from receiving communications from us or third-parties you can do this at any time by contacting us at [dpo@cqsltd.com](mailto:dpo@cqsltd.com).

## Storing and retaining your personal data

We are committed to protecting the security of your personal data, which is held in secure data centres in the European Union in accordance with current legislative requirements, industry standards and technology. We will keep the personal data you have provided for as long as we have a relationship with you. Once that relationship has ended we will retain it in accordance with this Policy only for as long as we reasonably require and it will then be deleted and destroyed where legislation allows.

Your data is stored in the following places;

1. The Accounts System
2. The Company CRM
3. In your customer file on our server; Server is secure and behind a firewall
4. In our offsite backup files; Secured in an EU Data Centre
5. In your contract file in our office
6. In Adobe Sign for Signature
7. In our Calendar booking system
8. Email correspondence

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## Security

Once it is received we store your personal data as set out in this Policy.

We cannot guarantee the complete security of our databases, nor that information you supply may not be intercepted while being transmitted to us over the internet. However, we have taken measures to ensure our systems are secure.

## Disclosure (sharing) of your information

We have already described in the '*Marketing Information*' section of this Policy under what circumstances your personal information may be shared.

This does not include requests from authorities / governments where we are legally obliged to do so.

## YOUR RIGHTS

### Right to be Informed:

This policy details the personal information that we hold and process for you.

All requests set out in this section or other queries relating to this Policy should be addressed to The Data Protection Officer. Please include your name, address, and/or email address when you contact us.

### Right of Access:

You have the right to see a copy of the information that we hold about you. We may charge a small fee towards the cost of administering any request you make which is manifestly unfounded, excessive or repetitive.

### Right to Rectification:

You have the right to ask that the information we hold about you by contacting us as above. We encourage you to update your personal information promptly if it changes.

### Right to Erasure:

You (and any parent/guardian of a minor) have the right to request that we close your account and/or delete your personal information from our database. We will make all reasonable efforts to comply with this request. However, it may not be possible to delete an entry without some delay and without retaining some residual personal information necessary for our legitimate interests, such as backups and records of deletions (including to ensure we no-longer communicate with you) or because we are required or permitted to retain personal information for other lawful requirements or as part of the servicing of any contractual agreement.

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If you are dissatisfied with our response to any of your data privacy concerns you have the right to raise this with the Office of the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (<https://ico.org.uk>).

## **Right to Restrict Processing:**

You may request that we stop processing your personal information. We may still store the data just not process it. We will restrict processing of personal data if its accuracy is contested and until its accuracy is verified or if you object to the processing and we are assessing whether there are legitimate grounds. Where personal data is disclosed to third parties, we will also notify them of the restriction to processing.

## **Right to Data Portability:**

You can ask for your personal information in machine readable format or to have it sent to another organisation. This allows you to move, duplicate, or transfer your personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. The right of data portability only applies to personal data that you have provided to us, for data sets where consent has been given or for the performance of a contract and when processing is carried out by automated means. Data will be provided in an organised, frequently used and machine-readable form and will be provided for free.

## **Right to Object:**

You can object to us processing your personal information. You have the right to object to processing unless the reason for use is “legitimate interests”, “the performance of a task in the public interest” or “exercise of official authority, including profiling, for marketing or for scientific / historical research or statistical analysis.” You can object to us processing your data using the following contact details:-

The Data Protection Officer

Britannia House

Britannia Way

Enigma Park

Malvern

Worcs

WR14 1GZ

[dpo@cqsltd.com](mailto:dpo@cqsltd.com)

We will respond to an objection within 30 days. In some cases, we will process your personal information for Direct Marketing purposes using the “Legitimate Interest” basis of lawful processing. In this case, as soon as an objection is received the processing of your personal data will cease immediately with no exceptions or arguments.

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## Rights regarding Automated Decision Making and Profiling:

We do not conduct any automated decision making or profiling.

## Cookies Policy

This Cookies Policy applies to the website and should be read alongside our Privacy Policy which explains who we are, the type of information we may hold about you and how we use it.

The website uses cookies. A cookie is a small file containing an identity code. With your consent, your device accepts the cookie and stores it. When you next visit the website, the code is retrieved, allowing an individual visitor or device to be recognised.

Cookies are used for a variety of purposes and do not cause harm to your device, but, if you wish to stop your computer accepting cookies, go to the help section of your internet browser (for example, Internet Explorer or Firefox) where you will find information on how to do this.

For further information about cookies and how to control their use, please visit the following third party educational resources: [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.eu](http://www.youronlinechoices.eu)

## Google Analytics

Google Analytics uses traffic log cookies to gain information about the use that is made of pages on the website. We use the information from these cookies to generate reports on the usage of the website which are used for evaluation and analysis. The purpose is to improve the website by tailoring them to the needs of users.

In such cases, no data which is itself specific to any identifiable user is retained.

In addition to standard analytics parameters, we receive data via Google Analytics Advertising Features including information about 'Demographics and Interest Reporting' which gives us greater insight into the *types* of visitors we receive.

As a user you can opt out of this process of collecting traffic log data. To do so please visit the following site which provides a browser add-on that enables a user to opt out -

**<http://tools.google.com/dlpage/gaoptout>**