

# Quintessa General Privacy Policy

Owner: Data Protection Coordinator

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## Document History

Version	Date	Notes
1.0	23 May 2018	Produced by PMS and reviewed by RHL
1.1	13 May 2019	Updated registered office
1.2	8 Jan 2021	Reviewed and updated by PMS & JAO. Some minor adjustments were made to simplify text and remove references to GDPR as from 1 Jan 2021, Data Protection Act 2018 superseded EU regulations.
1.3	24 Jan 2022	Reviewed and updated at the January 2022 Data Protection meeting to refer to UKBPSS pre-employment screening and references
1.4	24 Jan 2023	Reviewed by RZ. Minor formatting adjustments (e.g. insertion of Section cross-references).
1.5	22 Sep 2023	Updated registered office

## 1 Introduction

This privacy policy describes the personal data Quintessa collects and processes in the course of its business activities, the way we use them and the rights of the people whose data we process.

Quintessa is committed to being open and transparent about our use of data. Any personal data that we collect is handled in accordance with the Data Protection Act 2018. In the United Kingdom, Data Protection is regulated by the Information Commissioner's Office (ICO). Any questions you may have in relation to this privacy policy should be addressed to Quintessa's Data Protection Coordinator via [privacy@quintessa.org](mailto:privacy@quintessa.org) or the address below. Unresolved complaints may be forwarded to the ICO.

Quintessa's registered office is: The Hub, 14 Station Road, Henley-on-Thames, Oxfordshire, RG9 1AY, United Kingdom, and its business registration number is: 03716623.

## 2 The Personal Data Quintessa Collects

The personal data that Quintessa collects and processes can be grouped into five categories:

- ▲ contracts;
- ▲ communications;
- ▲ business intelligence;
- ▲ recruitment; and
- ▲ the Quintessa website.

Personal data associated with the first four categories are described below. Personal data associated with the Quintessa website is described in a separate privacy policy available via: <https://www.quintessa.org/privacy-policy>

### 2.1 Contracts

Quintessa has contracts with clients, through which we provide our services, and with service providers, whose services we procure. This section concerns the personal data we collect in relation to such contracts.

#### 2.1.1 What data do we collect?

We collect personal data required to fulfil the contract. This commonly includes contact details (e.g. names, addresses; positions, organisations of relevant parties) and invoicing/billing details (e.g. payment account details). We may record notes of meetings with a client/service provider that identifies attendees.

#### 2.1.2 Why do we collect them?

For the purposes of fulfilling the contract.

#### 2.1.3 With whom do we share them?

We will not share your personal data with third parties, except in the following circumstances.

- ▲ We may share certain data with trusted service providers for the purposes of fulfilling the contract only, such as with our bank to initiate a payment.
- ▲ We may share your personal data if required to do so by law.
- ▲ In the case of a formal external audit of Quintessa's systems, your data may be viewed within our company premises and network by the auditor who is required to maintain confidentiality.

### 2.1.4 For how long are they kept?

A minimum of 10 years from completion of any such contract.

### 2.1.5 What is the legal basis for processing the data?

Contract. See Section 3 for information on your associated rights.

## 2.2 Communications

If you express a desire to opt into or out of being contacted by Quintessa for a specific purpose, such as receiving a newsletter or being notified about updates to this privacy policy, we update our records accordingly.

### 2.2.1 What data do we collect?

Contact details (e.g. name and email address) and communication preferences.

### 2.2.2 Why do we collect them?

To keep a record of your preferences.

### 2.2.3 With whom do we share them?

We will not share your personal data with third parties, except in the following circumstances.

- ▲ We may share your data if required to do so by law.
- ▲ In the case of a formal external audit of Quintessa's systems, your data may be viewed within our company premises and network by the auditor who is required to maintain confidentiality.

### 2.2.4 For how long are they kept?

Until you opt out.

### 2.2.5 What is the legal basis for processing the data?

Consent. See Section 3 for information on your associated rights.

## 2.3 Business Intelligence

This section refers to personal data that are not collected for the purposes of fulfilling a contract. (For such data, see Section 2.1)

### 2.3.1 What data do we collect?

Quintessa keeps internal records of business activities and interactions, including notes of communications, conferences and meetings. These records may refer to individuals (e.g. by name).

If we wish to store associated contact information (e.g. business email and phone number provided to us by an individual on a business card) within a central database then the individual will be informed, and that data will be managed under the Consent legal basis as per Section 2.2.

### 2.3.2 Why do we collect them?

As a means of recording who we met, when, and for what purpose, to facilitate business knowledge management.

### 2.3.3 With whom do we share them?

We will not share your personal data with third parties, except in the following circumstances.

- ▲ We may share your data if required to do so by law.
- ▲ In the case of a formal external audit of Quintessa's systems, your data may be viewed within our company premises and network by the auditor who is required to maintain confidentiality.

### 2.3.4 For how long are they kept?

For as long as we perceive the data to be useful.

### 2.3.5 What is the legal basis for processing the data?

Legitimate Interests. See Section 3 for information on your associated rights.

## 2.4 Recruitment

### 2.4.1 What data do we collect?

Curriculum Vitae (CV) and covering letters sent by prospective employees.

Personal references for prospective employees to whom a job offer might be made.

Results of pre-employment screening, such as UK Baseline Personnel Security Screening (BPSS) carried out by a trusted third-party supplier, on prospective employees to whom a job offer is made.

## 2.4.2 Why do we collect them?

For evaluating potential new recruits.

## 2.4.3 With whom do we share them?

We will not share your personal data with third parties, except in the following circumstances.

- ▲ Initially, such data are viewed by company directors. Personal contact data are redacted before circulating for review by the wider company.
- ▲ We may share your personal data if required to do so by law.
- ▲ In the case of a formal external audit of Quintessa's systems, your personal data may be viewed within our company premises and network by the auditor who is required to maintain confidentiality.

## 2.4.4 How long are they kept for?

If a candidate is awarded and accepts a contract following a recruitment process, then the data are stored in confidential files for the duration of employment with Quintessa, and thereafter for as long as Quintessa is legally obliged to, after which time they are securely destroyed.

If a candidate applies for a specific position and is not successful, then the data are securely destroyed within six months of the recruitment process for that position being complete, unless we have sought and received consent from the candidate to the contrary.

When such data is sent to Quintessa speculatively, they are held on file until such time that the individual requests that we delete them or until we decide we no-longer require them, in which case they are securely destroyed.

## 2.4.5 What is the legal basis for processing the data?

Consent. See Section 3 for information on your associated rights.

# 3 Your Rights

If you wish to exercise your rights in relation to your personal data, please use the facilities available to do so if appropriate (e.g. by following a link in a newsletter sent by Quintessa to unsubscribe from further such communications) or contact Quintessa's Data Protection Coordinator. Please note that the following rights are not absolute, and may be challenged or overridden in certain circumstances, such as to satisfy legal requirements.

Quintessa will endeavour to satisfy all reasonable requests within one month. Where that is not possible and so more time is required, you will be notified and be informed as to why. If a request is considered unfounded or excessive, you will be notified. Quintessa may then charge a fee to cover administrative costs if you still wish to proceed.

You have a right to be informed about the collection and use of your personal data. If you wish to be notified about changes to this privacy policy, please inform Quintessa's Data Protection Coordinator.

You have a right to access to the personal data we hold concerning you, and to have incorrect personal data rectified. Quintessa will make reasonable attempts to verify the identity of the source of any such requests before providing the relevant data. Whenever possible, responses will be made promptly and within one month.

You may request restriction of processing of your data for a limited period if you have a legitimate reason, such as while a disagreement about rights in relation to your personal data is resolved.

The remaining rights vary depending on the legal basis associated with the processing of the data. Please refer to Section 2 to determine which legal basis applies.

- ▲ For Consent, you may withdraw consent to processing of your personal data and may request their erasure.
- ▲ For Contract, you may request that your personal data is erased. However, since the data have been collected for the purpose of fulfilling a contract, this may not be possible or may necessitate termination of the contract.
- ▲ For Legitimate Interests, you may object to the processing of your data in the specified manner and may request for them to be erased.