

Client Data Privacy Notice

Overview

QMS International is committed to data protection and data privacy.

QMS holds personal data on its clients, and their employees, to provide its services. This Client Data Privacy Notice details the personal data QMS, and the Citation Group, may retain, process and share with third parties relating to your business and its employees. QMS is committed to ensuring that your information is secure, accurate and relevant. To prevent unauthorised access or disclosure, we have implemented suitable physical, electronic, and managerial procedures to safeguard and secure personal data we hold.

This policy will be subject to periodic review and it is recommended that you review this document from time to time to ensure that you are aware of any amendments applicable to the retention, processing and sharing of personal data.

A current copy can be found on our website (www.qmsuk.com/privacy-policy) and via request from the Data Protection Officer. A copy will also be provided on the Client Portal, Launchpad, to Account Holders for their reference.

Review History

Date	Version	Amendments/Comments	Reviewer(s)
Mar 18	1	Initial Draft	M Eastwood
May 18	1.1	First Publication	M Whitehouse

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Introduction

QMS International ("QMS", "we" or "us") holds personal data on its clients, and their employees, to provide its services. This Client Data Privacy Notice details the personal data QMS, and the Citation Group, may retain, process and share with third parties relating to your business and its employees. QMS is committed to ensuring that your information is secure, accurate and relevant. To prevent unauthorised access or disclosure, we have implemented suitable physical, electronic, and managerial procedures to safeguard and secure personal data we hold.

We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. This Notice sets out the personal information that we collect and process as a data processor, the purposes of the processing and the rights connected with it.

If you are in any doubt regarding the applicable standards, or have any comments or questions about this Notice, please contact the Group Data Protection Officer.

Types of personal information we collect

During your engagement with QMS and the Citation Group, or during negotiations with us, we may process personal information about you, your employees and other individuals whose personal information has been provided to us.

The types of personal data we will typically process are limited to the following:

- Name and contact details – such as business address, telephone number, email address
- Employment details – such as job title/position, office location
- Financial information – such as banking details (business accounts)
- IT information – information required to provide access to QMS systems and networks such as IP addresses, log files and login information
- Training information – courses undertaken as part of employment
- However, in some circumstances, we may be sent other personal or sensitive personal data when evidencing compliance with ISO standards (as part of our auditing function): for example, information about racial/ethnic origin, gender and disabilities, copies of identification documents, medical information etc. It is the client's responsibility to ensure that any data provided to QMS is only done in line with their GDPR obligations

Purposes for processing personal information

QMS utilize third-party servers via Microsoft Azure to hold its system data and other business services; these are based in both the EU and the United States – these have been assessed against QMS' security requirements to ensure that all appropriate security controls are in place to protect personal information.

Contractual purposes

We use this personal information when it is necessary for the provision of our services, in line with the purposes agreed upon between our client and QMS. We may collect and use personal information for supporting and managing the certification and compliance of our clients, in line with our services – for example the training records of staff, review of access controls, or the provision of documents and services when assessing quality controls.

Legal purposes

We may use personal information where we consider it necessary for complying with laws and regulations, including collecting and disclosing staff member personal information as required by law (e.g. for tax and health and safety), under judicial authorization, or to exercise or defend the legal rights of the companies within the Citation Group.

Legitimate interest

We may use personal information where we consider it necessary for QMS' legitimate interest, including:

- recording all telephone calls made to, or from, our advice centre
- marketing similar services to our clients

Details on these activities can be found on [QMS' main privacy policy](#).

Who we share personal information with

We take care to allow access to personal information only to those who require such access to perform their tasks and duties in relation to the provision of our services, and to third parties who have a legitimate purpose for accessing it to support these purposes. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the information is used in a manner consistent with this Notice and that the security and confidentiality of the information is maintained.

Transfers to other group companies

Personal data relating to account holders (the client) may be shared with other members of the Citation Group for other legitimate business purposes such as IT services/security, tax and accounting, and general business management and for marketing purposes.

Transfers to third-party service providers

In addition, we make certain personal information available to third parties who provide services to us. We do so on a "need to know basis" and in accordance with applicable data privacy law.

Transfers to other third parties

We may also disclose personal information to third parties on other lawful grounds, including:

- To comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, including, but not limited to, a subpoena, government audit or search warrant
 - In response to lawful requests by public authorities (including for national security or law enforcement purposes)
 - As necessary to establish, exercise or defend against potential, threatened or actual litigation
 - Where necessary to protect the vital interests of our employees or another person
 - In connection with the sale, assignment or other transfer of all or part of our business;
- or

- With your expressed consent

Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you (i.e. provision of services), or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact QMS' Data Protection Officer.

Transfer of personal information abroad

We may need to transfer personal information to countries other than the ones in which the information was originally collected. When we export your personal information to a different country, we will take steps to ensure that such data exports comply with applicable laws. For example, if we transfer personal information from the European Economic Area to a country outside it, such as the United States, we will implement an appropriate data export solution such as entering into EU standard contractual clauses with the data importer or taking other measures to provide an adequate level of data protection under EU law.

All electronic documentation, as well as aspects of our IT network, are stored within Microsoft Azure, located in the United States. Microsoft currently complies with both EU-U.S. Privacy Shield and EU Model Clauses, which are built into our service agreements.

Data retention periods

Personal information will be stored in accordance with applicable laws and kept for as long as needed to carry out the purposes described in this Notice or as otherwise required by applicable law. Generally, this means your personal information will be retained until the termination of employment, or relationship with QMS plus a reasonable period of time thereafter to respond to employment or work-related inquiries or to deal with any legal matters (e.g. judicial or disciplinary actions) or to document the proper termination of employment or work relationship (e.g. to tax authorities).

Data privacy rights

The account holder(s) may exercise the rights available under applicable data protection laws as follows:

- **Access, correct, update or request deletion** of personal information
- **Object to processing** of personal information, ask us to **restrict processing** of personal information or **request portability** of personal information.
- If we have collected and process personal information using a person's consent, then this can be **withdrawn** at any time. Withdrawing consent will not affect the lawfulness of any

processing we conducted prior to withdrawal, nor will it affect processing of personal information conducted in reliance on lawful processing grounds other than consent.

- You have the **right to complain to a data protection authority** about our collection and use of personal information. For more information, please contact your local data protection authority. In the United Kingdom, the data protection authority is the Information Commissioner's Office whose website is <https://ico.org.uk/>

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. You can read more about these rights at: <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

Updates to this Notice

This Notice may be updated periodically to reflect any necessary changes in our privacy practices. In such cases, we will inform you [on the intranet and, for significant changes, by company-wide email. We encourage you to check this notice periodically to be aware of the most recent version.

Contact details

Please address any questions or requests relating to this Notice to the Data Protection Officer at DPO@qmsuk.com or write to:

Data Protection Officer
QMS International
Kings Court
Water Lane
Wilmslow
SK9 5AR

Annex A – Third-party processors

Key third-party processors

The following are QMS', and the Citation Groups, key third-party processors who will, during your engagement with us, process your personal data.

FileMaker Pro

We use FileMaker Pro as our customer relationship management tool. It is a cross-platform relational database application which integrates a database engine with a graphical user interface (GUI) and security features, allowing users to modify the database by dragging new elements into layouts, screens, or forms.

All files are stored locally on premises at the QMS head office in Norwich and backed up securely in a UK based data center by Datto Inc (<https://www.datto.com/privacy-policy>).

Please see [FileMaker's Privacy Notice](#) for more information.

Microsoft

Azure is a comprehensive set of cloud services that developers and IT professionals use to build, deploy and manage applications through our global network of data centres. Integrated tools, DevOps and a marketplace support you in efficiently building anything from simple mobile apps to Internet-scale solutions.

Additionally, Microsoft Azure hosts several technical operations within QMS and the Citation Group, such as Active Directory, Exchange and OneDrive document storage.

This data is stored in data centres located in both the EU and the United States and will be retained for at least 7 years following termination – this data is retained for QMS' legitimate interest to ensure that all work-related documents are preserved and are fully auditable to meet legal obligations.

Please see Microsoft's [Privacy Notice](#) for more information.

Secure Business Computing Solutions (SBCS)

SBCS provide consultancy, accreditation and audit services to both public and private sector organisations. They provide comprehensive, end-to-end consulting across a range of disciplines from Cyber Security, Information Security, IT Infrastructure to Accreditation.

SBCS have partnered with QMS to deliver both ISO 27001 and GDPR Readiness Assessment services to QMS customers. Therefore, when you purchase one of these products, through QMS, information is securely shared with SBCS - this information is retained for QMS' legitimate interest to ensure that all work-related documents are preserved and are fully auditable to meet legal obligations.

Please see [SBCS's Privacy Notice](#) for more information.

Additional third-party processors

Additionally, your data may be shared with several third-party processors to meet legal requirements, where QMS or the Citation Group outsources aspects of its processes or when providing specific services relating to maintaining your employment or benefits. These companies may include, but are not limited to, the following:

- Base Camp (project management)
- Feefo (reviews and feedback platform)
- JotForm (survey and form creation platform)
- Hollinger (printing services)
- Launchpad (secure document storage platform)
- Salesforce (customer relationship management provider)
- Sage (accounting)
- Fountain (digital marketing)
- SnapEngage (live chat)
- WorldPay (payment provider)
- Soho 66 (VoIP service provider)
- Yomdel (live chat)
- MailChimp (email management)
- WiredMarketing (email management)
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Where the above third-party processors transfer data overseas outside of the European Economic Area (EEA), appropriate safeguards are in place to protect the data transferred.