



Quor Privacy Policy

Quor is committed to the safety and security of your personal information and data. When you provide personal information to us, we are legally obligated to use it in line with the General Data Protection Regulation 2018 and all other relevant data privacy laws. This privacy notice is to inform our customers how we and the companies we use process and look after your personal data. The data we collect is limited to information you provide to us that is necessary for entering into a contract with us and is collected with consent. We will always give you a choice in relation to how you prefer to be contacted by us, and you have a clear and simple option to withdraw your consent at any time.

It is important that you read this policy, together with any updates we may make on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Our core beliefs regarding your privacy and data protection:

- The customers within our data are covered by our duty of care.
- We use and protect your data in line with the 2018 General Data Protection Regulation.
- We dislike spam as much as you do!
- We will never make your personal information public, whether by selling or otherwise making available.

Relevant legislation:

Along with our computer systems and business processes, our website (www.quor.org.uk) has been designed to comply with the following national and international legislation with regards to data protection and user privacy:

- EU General Data Protection Regulation 2018 (GDPR)
- EU Data Protection Directive 1995 (DPD)
- UK Data Protection Act 1988 (DPA)

Our website's compliance with the above legislation, all of which are rigorous in nature, means that our website is more than likely to be compliant with the user privacy legislation and data protection set out by many other countries. If you are not sure about whether our site is compliant with your own country of residences' specific data protection and user privacy legislation you should contact our Data Protection Officer for further information. Details can be found below.

Who we are:

SP Bespoke Systems Ltd, trading as Quor. Our company registration number is 12357839 and our registered office is 34 Devon Square, Newton Abbot, Devon, England, TQ12 2HH.

How to contact us:

Telephone our head office: 01392 409134

Send us an email on: support@quor.org.uk

Writing to us at our registered office: As above

Our Data Protection Officer is:

Jon Whitfield.

Tel: 01392 409134

Email: jon@quor.org.uk

Any data subject may, at any time, contact our DPO directly with all questions and suggestions concerning data protection.

The website (www.quor.org.uk) may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our site, we encourage you to read the privacy policy of every website you visit.

Our Services:

We offer bespoke software development for business use, plus any relevant and related services that may be required by our customers.

We will comply with data protection law when it comes to the processing of your data. This says that the personal information we hold about you must be:

- 1) Used lawfully, fairly and in a transparent way.
- 2) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- 3) Relevant to the purposes we have told you about and limited to those purposes.
- 4) Accurate and kept up to date.
- 5) Kept only as long as necessary for the purposes we have told you about.
- 6) Kept securely.

The categories of information we collect and hold about you:

We may collect, store and use the following categories of personal information about you:

- **Identity Data:** Includes first name, maiden name, last name, username or similar identifier.
- **Contact Data:** Includes email address and telephone numbers.
- **Usage Data:** Includes information about how you use our website, products and services.
- **Profile Data:** Includes your username and password.
- **Marketing and Communications Data:** Includes your preferences in receiving marketing from us and our third parties and your communication preference.
- **Technical Data:** Includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

We also collect, use, and share **Aggregated Data** such as statistical or demographic information. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature.

How your personal information is collected:

We collect personal information about our customers either through an online enquiry form, over the telephone, by email, or in person. Personal data may also be collected through our support service, or in person through direct interaction.

We may also collect identity and contact data from our customers who are using the system for their business, and have identified you as a customer or supplier to their business and requested you to use the system to conduct business activities with them. However, a user's personal data will only be added to the site when the user has registered to use the site.

Why we collect your personal data and our lawful basis for doing so:

Purpose / Activity	Lawful basis for data processing
To allow us to perform our contract with you.	Performance of a contract.
To enable us with our legal obligations.	Compliance with a legal obligation.
To speak with a potential customer following a new enquiry.	Necessary for our legitimate interests for running our business.
To provide and maintain our service, including account	Necessary for our legitimate interests for running our

management.	business.
To manage our relationship with you which will include - notifying you about changes to our terms or privacy policy.	Necessary to comply with a legal obligation. Consent. Legitimate interest.
To deliver marketing communications and emails.	Necessary for our legitimate interests for running our business.
To manage your requests.	Necessary for our legitimate interests for running our business. Consent.

If you are an account user, we will also retain the password and username you select when you create an account. In this instance, we may use your email address for such purposes as to send a password reminder or notification of service change or outage. Your personal information may be retained on our systems for historical, statistical or research purposes.

Consent to use your details to contact you will never be implied, we will always directly ask for your permission to do this.

Personal data will be collected only if you allow us to. Our customers are always given the clear choice to opt in with regards to the collection of personal data. Any data that we collect is used solely by Quor. Data is only collected for the purpose of serving our customers and contacting them in relation to the contract they have entered, or the request for information they have made. Personal data is only processed for the purpose that it was originally collected.

Third party data processors:

Quor will never share any personal information with any third party that is not deemed essential by us for the provision of our software and the performance of our contract. Any third-party processor that we use is compliant with the GDPR and has a trusted relationship with Quor.

Contact forms and email links:

Should our customers choose to get in touch using the enquiry form on our website, none of the data that is supplied will be stored by our website. Instead the data will be collated into an email and sent to us over the Simple Mail Transfer Protocol (SMTP). Our SMTP servers are protected by Transport Layer Security (TLS), meaning that the email content is encrypted before being sent across the internet. The email content is decrypted by our local computers and devices. Personally identifiable Information collected may include your name, email address and contact phone number. We may use your email address or phone number to contact you in response to your enquiry. This phone call will be made only to discuss the product that you have requested more information for.

This is how Quor will use your data:

The data we collect is used solely for the performance of the contract you have entered in to. Quor will not share your information for marketing purposes with any other company.

How we use particularly sensitive information:

Quor does not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Our policy towards children:

Because of the products and services that we offer, we will not knowingly engage with any customer or potential customer that is not 18 years or older.

Change of Purpose:

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use

your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Cookies:

A cookie is a small text file which is placed onto your device when you use our website. Cookies help us recognise your device and store some information about your preferences or past actions. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

How long we retain your data:

Quor retains personal data for as long as necessary to provide our services, or for other essential purposes such as complying with our legal obligations and resolving disputes and enforcing our agreements. Actual periods of retention can vary significantly for different types of data, given the circumstances. No purpose in this policy will require us keeping your personal information for longer than 2 years.

Quor will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our service, or we are legally obligated to retain this data for longer time periods.

How Quor protects your information:

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we have strict security and confidentiality procedures covering the storage and disclosure of your information in order to safeguard it, to prevent unauthorised access and to comply with the General Data Protection Regulation 2018. Specifically, we shall permit only authorised employees, who are trained in the proper handling of customer information, to have access to that information. Employees who violate our Privacy Policy are subject to our usual disciplinary procedures.

Your rights:

Because the data we hold about you is your data, you have the following rights in respect of the personal data we hold about you:

- 1) **Right to be Informed** – Your right to be informed is carried out through this notice.
- 2) **Right to Access** – This means that you can ask us for a copy of all personal data we hold about you. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. There will not be a charge for this request, unless requests are deemed excessive in nature. Requests for access will be completed within one month from receiving the request.
- 3) **Right to Rectification** – Given the nature of self storage, it is commonplace that our customers contact details change during the length of a contract with us. If you believe that any of the information we hold about you is incorrect or out of date, you have the right to correct such information by providing us with the correct up to date information. In addition, you can ask us to delete the incorrect or out of date information and we will be happy to do so unless we are prevented from doing so by law or regulation.
- 4) **Right to be Forgotten** – This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. Please note that where we are obliged to keep your personal data because of a regulatory or legal requirement, we will not be able to delete the data and must continue to retain it.
- 5) **Right to Restrict Processing** – In some limited circumstances you have the right to restrict the processing of your data.
- 6) **Right of Objection** – You have the right to object to us using your data for direct marketing purposes and to profiling.
- 7) **Right of Data Portability** – You have the right to request a copy of the personal data we hold about you in a commonly used and machine readable format. We can provide your data either to you or to a third party as you specify in your request.

- 8) **Automated Decision Making Objection Right** – Automated decision making is where a decision is made entirely by technological means without human intervention. Quor doesn't use or rely on automated decision-making system.

If you would like to exercise any of the above rights, please contact (preferably in writing) our Data Protection Officer using the contact details above.

Right to complain:

If you have any concerns about our handling of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) by visiting <https://ico.org.uk/concerns/> or telephoning the ICO helpline on 0303 123 1113.

Changes to this privacy policy:

We reserve the right to update this privacy policy at any time, and we will update our website with a new privacy policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.