



# **Privacy Policy**

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# QGate Data Privacy Statement

## GENERAL

QGate care about your privacy and we want to be as transparent as possible about how we process your personal data.

This policy is intended to explain what personal data we may collect about you, where we may obtain your data, how we use your data, and who we may disclose your data to and why.

This policy also explains your data rights; namely how to request access to your data, how to update your data, and how to request that your data be deleted when applicable.

This policy is under regular review. Please check this page for any policy updates.

Should we need to process your data in a new way, we will only do so after conducting a Privacy Impact Assessment. We will contact you to inform you of our lawful base for processing, to give you the opportunity to oppose the processing, and if applicable, to request your consent to process.

## PERSONAL INFORMATION WE MAY PROCESS

We may process:

- Contact information: full name, email addresses, phone numbers, associated company, company address
- Job role
- Previous company/job role
- Contact history (including emails)
- Purchase history (including quotes, orders, invoices)
- Support cases
- Marketing subscriptions/preferences/consent (including opt outs, unsubscribes, revoked consent)
- Activity on our website (such as pages visited, session length)
- IP address used to access our website
- Contracts (therefore signatures)
- CVs
- Response to marketing campaigns (such as email opens, clicks within emails)
- Product use details (including performance data)

We do not record the audio of telephone calls, but we may have a log of when you called, call length, who you spoke to, and what the subject of that call was.

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## HOW WE COLLECT PERSONAL INFORMATION

We may obtain information about you when:

- You visit our website
- You engage with us on social media
- You contact us (via web form, email, phone call, conversation) about products or services
- You subscribe to receive our blog updates
- You request to receive our newsletter(s)
- You use our products or services
- You contact us requesting assistance with a support query
- You request or use free trials of our products
- You are a paying customer
- You are a business partner, or a prospective business partner
- You intentionally give us your business contact information or make your business contact information available, for example at a networking event, an industry event, or a meeting.
- You are a job applicant, or a current or former employee
- You are a share holder

Your contact information may be passed on to us from a partner or vendor if we may be able to help you with our products or services. See here for details about vendors we work with: <https://www.qgate.co.uk/our-network/>

We expect the partner or vendor in question to have informed you of this prior to passing your information to us.

**If that was not the case, and you have just realised that a partner has given us information about you without your knowledge, please contact us immediately by sending an email to [privacy@qgate.co.uk](mailto:privacy@qgate.co.uk).**

We will tell you what data we hold, how we use it, and we will delete it if you wish us to.

## USE OF PERSONAL INFORMATION

Contact information may be used to respond to requests for contact, deliver products trials, or provide relevant service or product information and newsletters.

Contact history is maintained to provide a consistent quality experience with us.

Purchase history is retained for accounting purposes.

Support Cases are stored to determine where you are in solving a problem or if you have had a similar problem before.

Marketing subscriptions and opt outs are recorded.

Activity on our website is used to improve website experience; for example, by ensuring that our commonly accessed information is easily accessible.

Contracts are retained for legal purposes.

Responses to marketing campaigns are monitored to ensure that our marketing is useful and relevant to you.

If you are a customer of ours, for support or development purposes, we may require access to your system. In these cases, we will require written confirmation from the Data Controller that either

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- appropriate notification has been issued to all Data Subjects contained within the database of your policy regarding access by third parties for certain processing requirements, or
  - all personal identifying information has been removed from the database, or
  - data has been modified to anonymise all persons within the system such that the identification of individuals is not possible

Having received such confirmation, we will accept transfer of the data to us and, once we have completed the work required, shall retain it for a limited period of no more than 60 days after completion. If appropriate, we will return a single back up of any such database in order that the customer may then hold a copy of the complete data/database for future development or support processes.

Product use details, including performance data, is used to improve our products. If we publish any statistical data, any personal information will be removed.

If you send us your CV, we may choose to retain it for consideration in future recruitment processes. Should this be the case, you will be informed and given the opportunity to oppose, in which case we will delete it.

We do not use automated decision making when processing data.

We may share limited personal data with another vendor to complete a commercial transaction; for example, to obtain product licenses. In this case you will be informed of who that vendor is.

## DATA RETENTION

The type of engagement you may have with us dictates our retention period for your personal information. We retain information only for as long as is necessary for the purposes specified in this policy.

Should you cease to be a customer, we will delete the data that is no longer relevant, and we will keep the data that is necessary for legal and accounting reasons,

It is part of QGate's commitment to the principle of Data Minimisation to conduct data culling once a year.

## MARKETING

We do not share data with third parties for marketing purposes.

As with most technological based businesses operating solely in a Business-to-Business capacity, our marketing communications are sent to professional email addresses and consist of relevant, informative industry and product updates, including blog articles and white papers from QGate and other experts. News about industry conferences and other events, about product releases and new versions, and technical information such as "how-to" guides and tutorials. They are sent to our customers, our partners, our prospective customers and our prospective partners, and who have not opted out. We send these emails as a Legitimate Interest, and in all of them, there is an obvious and simple way of opting out of such messages in the future. This opt-out is automatic and is registered immediately. The tool that QGate uses for marketing communications has a safety feature that stops it from sending emails to anyone who has opted out.

## COOKIES

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Cookies are small data files websites may save on your computer or handheld device that usually includes an anonymous unique identifier. Our website may use cookies for user authentication, keeping track of your preferences, promotional campaigns, tracking our audience size and traffic patterns, and in certain other cases. If you do not wish cookies to be placed on your computer or handheld device, then they can be disabled in your web browser. The option to do so is normally found in your browser's "security settings" section.

Please note that permanently disabling cookies in your browser may hinder your use of our websites as well as other websites and interactive services.

## BUSINESS TRANSATIONS AND DATA TRANSFERS

QGate may at any time carry out a business transaction such as the buying or selling of QGate assets, merger, restructuring etc. Information about Customers as well as aggregated and anonymized data is typically one of the business assets that is transferred. Should the QGate in whole or partially, be acquired, user information would be one of the assets that is reviewed and transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of the company may continue to use your Personal Data as set forth in this Privacy Policy.

## INTERNATIONAL TRANSFERS

We may transfer information outside the EEA to execute commercial transactions, as above.

This privacy notice does not cover the links within this site linking to other websites (some of which are based outside of the EEA). We encourage you to read the privacy statements on the other websites you visit.

## YOUR DATA RIGHTS

If we hold any personal information about you, then you are entitled to certain data rights.

You have the following rights:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

You can read more about these rights here - <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

## SUBJECT ACCESS REQUESTS

If you want to make a Subject Access Request (SAR), email us to [privacy@qgate.co.uk](mailto:privacy@qgate.co.uk). We may require additional identifying information to carry out your request. You will not be charged for making a request or for us delivering your request. We will respond to your request without undue delay and always within one calendar month.

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## COMPLAINTS

If you are concerned about the way we are processing your data, send us an email to [privacy@qgate.co.uk](mailto:privacy@qgate.co.uk), or use one of the other contact methods below.

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If you still have questions or complaints about your data privacy, you have a right to contact or report a concern to the UK's data privacy supervisory authority, the Information Commissioner's Office - <https://ico.org.uk/global/contact-us/>

If we unlawfully refuse your request regarding your data rights, you have a right to complain to the Information Commissioner's Office and possibly receive a judicial remedy.

## SPECIAL CATEGORY DATA AND CHILDREN'S DATA

QGate do not collect or process special category data from users of this website, individuals who contact us, or users/interested parties of our products and services. If we receive any special category information (for example, in a CV sent to us) it is our policy to delete it from our records as soon as possible.

We may only process information of a person under the age of 16 for work experience purposes. It is very unlikely, given the nature of our business, that a child would provide us with their data even if inadvertently, outside this context.

However, and while we do not have the intention of processing any kind of data related or belonging to children, we have contact forms publicly available in our website. As with all online activity, children should be supervised at all times while engaging with QGate's websites.

If at any time we suspect that an online form was submitted by a child, we will delete all the information obtained via such form, from all systems where that data may have been stored.

## FURTHER INFORMATION

QGate Software Ltd are a private limited company (Company Number: 03301336), registered at:

D2 Fareham Heights  
Standard Way  
Fareham  
Hampshire  
PO16 8XT  
United Kingdom

If you want to request more information, request access to your data, or if you have a question or complaint about our approach to data protection, privacy or security, email us at [privacy@qgate.co.uk](mailto:privacy@qgate.co.uk).

