

QUANTUMA LLP PRIVACY POLICY AND COOKIES POLICY

We at Quantuma LLP (“**we**” or “**our**” or “**us**”) want to make sure all the personal information we have collected about you is safe and secure whether we collect it through our website <http://www.quantuma.com/> or from other sources. This Policy set outs our commitments to you, in compliance with and beyond the General Data Protection Regulation (commonly known as the **GDPR**) and explains how we collect, store and use your personal information.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but our Quality & Risk Partner has overall responsibility for data protection compliance in our organisation. If you have any questions about this Policy or what we do with your personal information, contact details are set out in the “**Contact**” section below.

PRIVACY NOTICES

Collecting specific, relevant personal information is a necessary part of us being able to provide you with any services or products you may request from us or in providing services or products to our customers and members, providing you with information you have requested or just managing our relationship with you, whoever you are.

When we hold or use your personal information as a **data controller or controller** (*see below for a description of what this is*) we will provide you with a privacy notice which sets out in detail what information we hold about you (such as your contact details, address, etc.), how your personal information may be used and the reasons for these uses, together with details of your rights.

Where we collect personal information from you directly, we will provide this privacy notice at the time we collect the personal information from you. Where we receive your personal information indirectly, we will provide this privacy notice when we first contact you, first pass the data to someone else or within a month, whichever is the earlier.

We will only provide this privacy notice to you once, generally at the start of our relationship with you. However if the applicable privacy notice is updated substantially, then we may provide you with details of the updated version. You are encouraged to check back regularly for updates.

Copies of our current privacy notices, which are listed below, can be found at <http://www.quantuma.com/legal-notices/>:

- Client privacy notice;
- Prospective employee privacy notice;
- Privacy notice for everyone else external to our organisation, “rest of the world”; and
- Privacy notice relating to insolvency appointments

Please note that it is possible for you to be covered by more than one privacy notice, for example you may be a supplier to our business but also a client of our business. In this example both our client privacy notice and our rest of the world privacy notice would apply to you, but for different categories of your personal information.

THE DIFFERENCE BETWEEN DATA CONTROLLERS/PROCESSORS

A **data controller or controller** is a person who controls how personal information is processed and used. Data controller or controller are two terms that mean the same thing. A **data processor** is a person who processes and uses personal information in accordance with the instructions of a third party, i.e. the data controller or controller.

This distinction is important. You have certain rights in relation to your personal information, for example the right to be provided with the personal information held about you and details of its use and the right to have certain of your personal information either erased or anonymised, commonly referred to as the right to be forgotten (*see below to see what rights you have*). These rights can generally only be exercised against a controller of your information.

In most cases we will be a controller of your personal information. In any case where we are not a controller this means that you cannot exercise these rights against us directly (i.e. where we only act as a data processor), but you can do so against the controller (i.e. the person who controls how we

process the personal information). In these cases we will endeavour to inform you who is the controller of your personal information so that you can direct any such requests to them.

Also it is only a controller that will provide you with a privacy notice about your personal information, so where we process your personal information as a controller we will provide you with a privacy notice. Where we process your personal information as a data processor for a third party, that third party should provide you with a privacy notice which will set out details regarding the processing of your personal information, which should also include the processing to be carried out by us on their behalf.

HOW DO WE USE YOUR PERSONAL INFORMATION?

Where we are a controller we will use your personal information as described in the privacy notice provided to you, but, for example, we may use your personal information to administer our relationship with you or to send you information we think you might find useful. To see how we use your personal information as a controller, copies of our current privacy notices, which are listed below, can be found at <http://www.quantuma.com/legal-notices/>.

- Client privacy notice;
- Prospective employee privacy notice;
- Privacy notice for everyone else external to our organisation, "rest of the world"; and
- Privacy notice relating to insolvency appointments

WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

Details of how we disclose your personal information are set out in the relevant privacy notice provided to you, but generally it is where we need to do so in order to run and operate our organisation (e.g. where other people process information for us). In such circumstances, we will put in place arrangements to protect your personal information. Outside of that we do not disclose your personal information unless we are required to do so by law.

If we as a controller transfer personal information about you outside the European Economic Area (EEA), we will let you know and ensure that all reasonable security measures are taken and that any third party processors will be required to process the information in accordance with information protection laws and we will notify you in your privacy notice if we are the information controller.

We do not sell, trade or rent your personal information to others, except we may provide it as part of our client services.

HOW LONG DO WE HOLD ON TO YOUR PERSONAL INFORMATION?

Further details of how long we hold onto your personal information for are set out in the relevant privacy notice provided to you, but we will only hold your information for as long as is necessary or where you ask us to delete records we may delete it earlier.

The duration for which we retain your personal information will differ depending on the type of information and the reason why it was collected. However, in some cases personal information may be retained on a long term basis: for example, personal information that we need to retain for legal purposes will normally be retained for at least six years in accordance with usual commercial practice and regulatory requirements.

WHAT ARE YOUR RIGHTS?

Full details of your rights set out in the relevant privacy notice provided to you, but you are entitled by law to ask for a copy of your personal information at any time. You are also entitled to ask us to correct, delete or update your personal information, to send your personal information to you or another organisation and to object to automated decision making. Where you have given us your consent to use your personal information in a particular manner, you also have the right to withdraw this consent at any time.

To exercise any of your rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contact**" section below. You can also unsubscribe from any **direct marketing** by clicking on the unsubscribe link in the marketing messages we send to you.

You should note that some of your rights may not apply as they have specific requirements and exemptions which apply to them and they may not also apply to personal information recorded and

stored by us. However your right to withdraw consent or object to processing for direct marketing are absolute rights.

If you are unhappy with the way we are using your personal information you can complain to the UK Information Commissioner's Office or your local data protection regulator. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>. However, we are here to help and would encourage you to contact us to resolve your complaint first.

LINKING WITH THIRD PARTY SITES

Our website may, from time to time, contain links to and from the websites of associated companies, regulatory bodies, R3 and other relevant industry bodies. If you follow a link to any of these websites, please note that these websites have their own privacy policies and they will be a data controller of your personal information. We do not accept any responsibility or liability for these policies and you should check these policies before you submit any personal information to these websites.

In addition, if you linked to this website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

SECURITY

We employ a variety of technical and organisational measures to keep your personal information safe and to prevent unauthorised access to, or use, or disclosure of it. Unfortunately, no information transmission over the Internet is guaranteed 100% secure nor is any storage of information always 100% secure, but we do take all appropriate steps to protect the security of your personal information.

COOKIES

Certain parts of our website use "cookies" to keep track of your visit and to help you navigate between sections. A cookie is a small data file that certain websites store on your computer's hard-drive when you visit such websites. Cookies can contain information such as your user ID and the pages you have visited. The only personal information a cookie contains is information that you have personally supplied.

We use cookies on our website to enable us to deliver content that is specific to your interests and gives us an idea of which parts of the website you are visiting and to recognise you when you return to the website. Reading cookies does not give us access to other information on your computer's hard-drive and our website will not read cookies created by other websites that you have visited.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. If, however, you select this setting you may be unable to access certain parts of the website. Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies when you access the website.

Please note providers of third party content may also use cookies over which we have no control. For detailed information on the cookies we use and the purposes for which we use them see the table at the end of the policy.

LOG FILES

In common with most websites, our website logs various information about visitors, including internet protocol (IP) addresses, browser type, internet service provider (ISP) information, referring / exit pages and date / time stamp.

We may use this information to analyse trends, administer the website, track your movement around the website and gather broad demographic information.

CHANGES TO THIS POLICY

Any changes we may make to this Policy in the future will be posted on our website and, where appropriate, notified to you by e-mail. When we change this Policy in a material way, we will update the version date at the bottom of this page. Please check back frequently to see any updates or changes to this Policy and should you object to any alteration, please contact us as set out in the "**Contact**" section below.

CONTACT

In the event of any query or complaint in connection with the information we hold about you, please email dataprotection@quantuma.com.

Whilst this privacy policy sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

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Necessary:

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

Cookie	Name	Purpose	More information
Cloudflare	_cfduid	Used by the content network, Cloudflare, to identify trusted web traffic.	1 year
ASP.NET	ASP.NET_SessionId	Preserves the visitor's session state across page requests.	Session
nr-data.net	JSESSIONID	Preserves users states across page requests.	Session

Marketing:

Marketing cookies are used to track visitors across websites. They are used to display ads that are relevant and engaging for the individual user.

Cookie	Name	Purpose	More information
Addthis.com	_atuvc	Updates the counter of a website's counter of a website's social sharing features.	Stored for 13 months
Addthis.com	_atuv	Ensures that the updated counter is displayed to the user if a page is shared with the social sharing service, AddThis.	Session
Addthis.com	_at.cww	Used by the social sharing platform AddThis.	Persistent
Addthis.com	at-lojson-cache-#	Used by the social sharing platform AddThis.	Persistent
Addthis.com	at-rand	Used by the social sharing platform AddThis.	Persistent
Addthis.com	bt2	Used by the social sharing platform AddThis to keep a record of parts of the site that have been visited in order to recommend other parts of the website.	255 Days
Addthis.com	di2	Keeps track of expiry dates of other cookies used by the social sharing platform AddThis.	1 Year
Addthis.com	loc	Geolocation, which is used to help providers determine how users who share information with each other are geographically located.	13 Months
Addthis.com	uid	Creates a unique, machine-generated user ID. AddThis, uses the user ID to make it possible for the user to share content across social networks	1 Year

		and provide detailed statistics to various providers.	
Addthis.com	uvc	Detects how often the social sharing service, AddThis, encounters the same user.	13 Months
Addthis.com	vc	Used by the social sharing platform AddThis.	1 Year
Addthis.com	ouid	Unclassified	1 Year
Addthis.com	Mus	Unclassified	1 Year
Addthis.com	Uid	Creates a unique, machine-generated user ID. AddThis, which is owned by ClearSpring Technologies, uses the user ID to make it possible for the user to share content across social networks and provide detailed statistics to various providers	1 year
Addthis.com	xtc	Registers the user's sharing of content via social media.	13 Months
DoubleClick.net	IDE	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking on the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user	2 years
Adnxs.com	Sess	Used to check if the user's browser supports cookies	Session
Adnxs.com	Uuid2	Registers a unique ID that identifies a returning user's device. The ID is used for targeted ads	3 months
Semasio.net	SEUNCY	Registers a unique ID that identifies the user's device for return visits	179 Days
Tapad.com	TapAd_DID	Used to determine what type of devices (smartphones, tables, computers, TVs etc.) is used by a user.	2 months
Tapad.com	TapAd_TS	Used to determine what type of devices (smartphones, tables, computers, TVs etc.) is used by a user.	2 months
Google Analytics	Collect	Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels	Session
Adsrvr.org	TDCPM	Registers a unique ID that identifies a returning user's device. The ID is used for targeted ads	1 year – you can opt-out at any time on http://www.adsrvr.org/
Adsrvr.org	TDID	Registers a unique ID that identifies a returning user's device. The ID is used for targeted ads	1 year – you can opt-out at any time on http://www.adsrvr.org/
DoubleClick.net	Test_cookie	Used to test of the user's browser supports cookies	Session

Mathtag.com	Uuid	Collects data on the user's visits to the website, such as what pages have been loaded. The registered data is used for targeted ads	1 year
Mathtag.com	Uuidc	Collects data on the user's visits to the website, such as what pages have been loaded. The registered data is used for targeted ads	1 year

Statistics:

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

Cookie	Name	Purpose	More information
Google Analytics	_utm.gif	Google Analytics Tracking Code that logs details about the visitor's browser and computer.	Session
Google Analytics	_utma	Collects data on the number of times a user has visited the web site as well as dates for the first and most recent visit. Used by Google Analytics	2 Years
Google Analytics	_utmb	Registers a timestamp with the exact time of when the user accessed the website. Used by Google Analytics to calculate the duration of a website visit	Session
Google Analytics	_utmc	Registers a timestamp with the exact time of when the user leaves the website. Used by Google Analytics to calculate the duration of a website visit	Session
Google Analytics	_utmt	Used to throttle the speed of requests to the server	Session
Google Analytics	_utmz	Collects data on where the user came from, what search engine was used, what link was clicked and what search term was used. Used by Google Analytics	6 months
Google Analytics	_ga	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	2 Years
Google Analytics	_gat	Used by Google Analytics to throttle request rate	Session
Google Analytics	_gid	Registers a unique ID that is used to generate statistical data on how the visitor uses the website	Session
Typekit.net	p.gif	We use custom fonts from Typekit and this allows them to ensure we are properly licensed	Session
clickdimensions	cusid	This cookie is used to establish and continue a user session with the site. This cookie expires when a user pauses on a page on the site for longer than 30 minutes.	30 minutes from set/update

Clickdimensions	Cuvid	This cookie is typically written to the browser upon the first visit to the site <i>from that web browser</i> This cookie is used to determine unique visitors to the site and it is updated with each page view. Additionally, this cookie is provided with a unique ID that the application uses to ensure both the validity and accessibility of the cookie as an extra security measure.	2 years from set/update
Clickdimensions	Cuvon	Used to signal the last time a visitor viewed a page	30 minutes from set/update
Quantuma	Cookieconsent_dismissed	This cookie remembers if a web visitor has dismissed the 'cookie consent' banner	1 year

Visitors can easily opt out of interest based advertising facilitated by the AddThis tools at any time using the AddThis [opt out](http://www.addthis.com/privacy/opt-out). <http://www.addthis.com/privacy/opt-out>

For more information on the cookies AddThis store, visit: <http://www.addthis.com/privacy>
You may opt-out to advertising at any point using the EDAA opt-out program - currently available at <http://www.youronlinechoices.eu/>