



### **PRIVACY NOTICE**

We know that you care how information about you is used and shared, and we appreciate your trust in us to do that carefully and sensibly. We at QX Global Group are committed to protecting and respecting your privacy.

Our Group means our subsidiaries, our ultimate holding company, its subsidiaries and our associated companies as defined in section 1159 of the UK Companies Act 2006.

This notice sets out the basis on which any personal data we collect from you or that you provide to us will be processed by us.

For the purposes of data protection legislation in force from time to time, the data controller is QX Global Group Ltd., Castle Chambers, Off Mill Bridge, Skipton, North Yorkshire BD23 1NJ, UK, +44 870 803 1033.

#### **PRIVACY POLICY**

#### 1. Introduction

- **1.1** We are committed to safeguarding the privacy of our website visitors; in this policy, we explain how we will treat your personal information.
- **1.2** We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website.

### 2. Collecting Personal Information

- **2.1** We may collect, store and use the following kinds of personal information:
  - a) Information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
  - b) Information that you provide to us when registering with our website (which includes first/last name, phone number, email address, your country/region);
  - c) Information that you provide to us for the purpose of subscribing to our email notifications and/or newslettersand /or whitepapers and other documents available for download from our website (including your name and email address);
  - d) Information contained in or relating to any communication that you send to us or send through our website (including the communication content and metadata associated with the communication), including the Automated Website Chat; and
  - e) Any other personal information that you choose to send to us.

### 3. Legal Grounds For Processing Personal Information

- **3.1** We will typically collect and use your personal information only;
  - a) Where we have your consent to do so;
  - b) Where we have to comply with our legal obligations;
  - c) Where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms.
  - d) Where the processing is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- 3.2 If you have any questions concerning the legal basis on which we collect and use your personal information, please do write us at <a href="mailto:dpo@qxglobalgroup.com">dpo@qxglobalgroup.com</a>, and we'll ensure that all your doubts are clarified.

### 4. Using Personal Information

- **4.1** Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.
- **4.2** We may use your personal information to:
  - a) Administer our website and business;
  - b) Personalise our website for you;
  - c) Enable your use of the services available on our website;
  - d) Send statements, invoices and payment reminders to you, and collect payments from you;
  - e) Send you non-marketing commercial communications;
  - f) Send you email notifications that you have specifically requested;
  - g) Send you our email newsletter if you have requested it (you can inform us at any time if you no longer require the newsletter);
  - h) Enable you to download information/white papers/documents you have requested;
  - i) Send you marketing communications relating to our business which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications);
  - j) Deal with enquiries and complaints made by or about you relating to our website;
  - k) Keep our website secure and prevent fraud; and
  - Verify compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service).

**4.3** We will not supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

### 5. Disclosing Personal Information

- **5.1** We may disclose your personal information to any of our employees insofar as reasonably necessary for the purposes set out in this policy.
- 5.2 We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.
- **5.3** We may disclose your personal information:
  - a) To the extent that we are required to do so by law;
  - b) In connection with any ongoing or prospective legal proceedings;
  - c) In order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
  - d) To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.
- 5.4 Except as provided in this policy, we will not provide your personal information to third parties.

#### 6. International Data Transfers

- 6.1 Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.
- 6.2 Information that we collect may be transferred to the following countries, which do not have data protection laws equivalent to those in force in the UK and European Economic Area: the United States of America and India.

#### 7. Retaining Personal Information

- 7.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.
- **7.2** Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 7.3 Without prejudice to Section 6.2, we will usually delete personal data falling within one month.
- **7.4** Notwithstanding the other provisions of this Section 6, we will retain documents (including electronic documents) containing personal data:
  - a) To the extent that we are required to do so by law;
  - b) If we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and

c) In order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

#### 8. Security Of Personal Information

- **8.1** We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.
- **8.2** We will store all the personal information you provide on our secure (password- and firewall-protected) servers.
- **8.3** You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- **8.4** You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

#### 9. Amendments

- 9.1 We may update this policy from time to time by publishing a new version on our website.
- 9.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- **9.3** We may notify you of changes to this policy [by email or through the private messaging system on our website].

#### 10. Your Rights

- **10.1** You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
  - a) The supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).
- 10.2 We may withhold personal information that you request to the extent permitted by law.
- 10.3 You may instruct us at any time not to process your personal information for marketing purposes.
- 10.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt-out of the use of your personal information for marketing purposes.
- 10.5 To exercise your rights, please send an email to <a href="SAR@qxglobalgroup.com">SAR@qxglobalgroup.com</a>.

#### 11. Third Party Websites

- **11.1** Our website includes hyperlinks to and details of third party websites.
- **11.2** We have no control over and are not responsible for the privacy policies and practices of third parties.

# 12. Updating Information

**12.1** Please let us know if the personal information that we hold about you needs to be corrected or updated.

# 13. Data Protection Registration

- 13.1 We are registered as a data controller with the UK Information Commissioner's Office.
- **13.2** Our data protection registration number is Z8405505.

#### 14. Our Details

- 14.1 This website is owned and operated by QX Global Group Ltd.
- **14.2** We are registered in England and Wales under registration number 04957862, and our registered office is at Castle Chambers, Off Mill Bridge, Skipton BD23 1NJ.
- **14.3** Our principal place of business is at 201 GNFC Info Tower, SG Highway, Bodakdev, Ahmedabad 380054 India

### 15. You Can Contact Us:

- a) By post, using the UK postal address given above;
- b) Using our website contact form;
- c) By telephone, on the contact number published on our website; or
- d) By email, using the email address published on our website.
- e) By email, using the email address published on our website.

# **Complaints or Queries**

For any privacy-related queries or concerns, you may contact QX Data Protection Officer at <a href="mailto:documents.com">documents.com</a>.