

Quatrefoils Limited – Privacy Statement

Updated: 1st July 2023

Introduction

Quatrefoils are firm of Chartered Surveyors and Construction Consultants who provide professional services in the property and construction industry within the United Kingdom.

At Quatrefoils, we prioritise your privacy and are committed to using your personal information solely for the purpose of administering your account and delivering the services you have requested from us. We want to assure you that we will never sell, share, or utilize your personal information for any purposes beyond what is described in this statement.

This Privacy Policy Statement outlines how we will handle and share the information you provide to us. It defines your relationship with Quatrefoils Limited and explains how we will process your data.

About Quatrefoils Limited and Contacting Us

Quatrefoils is a trading name of Quatrefoils Limited, a registered company in England that operates and a Property and Building Consultancy practice. We are also registered with the Information Commissioner's Office under the Data Protection Act 1998. Our ICO Reference is ZA408217.

Data Controller

This privacy statement is issued by Quatrefoils Ltd. Any reference to "Quatrefoils", "we", "us" or "our" in this statement, we are specifically referring to the relevant company mentioned above, which is responsible for processing your data. Quatrefoils Limited acts as a data controller and assumes responsibility for this website.

To ensure compliance with this privacy statement and address any queries you may have or requests to exercise your legal rights, we have a designated contact in the company. If you require further information or assistance, please reach out to us support team at: info@quatrefoils.co.uk or alternatively you can contact us at:-

Quatrefoils Ltd
Brook House,
54a Cowley Mill Road,
Uxbridge,
Middx. UB8 2FX

We are obliged to inform you that you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the U.K. supervisory authority for data protection issues (www.ico.org.uk).

However, in the first instance we would welcome the opportunity to resolve and attend to any concerns or issues before you approach the ICO, please do contact us. If you wish to make changes to your preferences, please also let us know.

How we operate

We operate in line with EU GDPR (May 2018) data protection guidelines. We are committed to maintaining your personal rights and allow all users to change or withdraw their opt-in options at any time. We will also advise you on how to raise a complaint to the relevant authorities, namely the Information Commissioner's Office. We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

Whom this privacy policy applies to

Quatrefoils is a Property and Building Consultancy responsible for providing Building Surveying, Project Management, Building Consultancy and Architectural Services to Clients throughout the United Kingdom. This policy relates to users of Quatrefoils and processing of your data is required to offer you these services. This policy applies to individuals who have registered with Quatrefoils as either a customer, user, administrator, employee or in any other capacity.

Sensitive Data

We do not collect any Sensitive Data about you. Sensitive data refers to data that 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. We do not collect any information about criminal convictions and offences.

What this policy applies to

This section describes the lawful basis for processing your data and applies to the information about yourself that you choose to provide us with or that you allow us to collect. This includes (as a customer):

- Information you provide during the registration and instruction process
- Information you provide when you create campaigns
- Information you provide in the form or number data, messages or meta-data
- Information we collect about how you use the website
- Information relating to administering finance (fees, contracts and payments) purchases and other transactions
- Information given and stored as part of our ongoing relationship

Under the rules of GDPR (2018), personal data is defined as “Any information relation to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly”.

Upon instruction from a customer / client, Quatrefoils will be responsible for processing the following personal data:-

- ❖ Customer Name
- ❖ Address
- ❖ Telephone Numbers
- ❖ Email Addresses
- ❖ other information that is deemed relevant at the time of appointment.

Scope of Consent

By providing us with your personal data, you explicitly consent to its use in accordance with this privacy policy. You have the freedom to withdraw this consent at any time using the methods described below.

Opting Out at a Later Date

Once you have granted your consent, you retain the right to modify or withdraw it at any time. You can also choose to object to the processing of your personal data. We fully respect all user rights as defined in the GDPR. If you have any comments or wish to file a complaint, please visit Quatrefoils or contact us using the contact details provided above.

Rights Under Data Protection Laws

Under certain circumstances, you have rights under data protection laws regarding your personal data. These rights include:

- ❖ Requesting access to your personal data.
- ❖ Requesting the correction of your personal data.
- ❖ Requesting the erasure of your personal data.
- ❖ Objecting to the processing of your personal data.
- ❖ Requesting the restriction of processing of your personal data.
- ❖ Requesting the transfer of your personal data.
- ❖ Right to withdraw consent.

For more information about these rights, please visit: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/>

You will not be charged a fee to access your personal data or to exercise any of the aforementioned rights. However, if your request is deemed unfounded, repetitive, or excessive, we may charge a reasonable fee or refuse to comply. In such cases, we will provide a justification for our decision.

To ensure the security of your personal data and prevent unauthorized disclosure, we may need to verify your identity and request additional information. This is a precautionary measure. If necessary, we may contact you for further details to expedite our response.

We strive to address all legitimate requests within one month. However, if your request is complex or multiple requests have been made, it may take longer to respond. In such cases, we will notify you and keep you informed of the progress.

Please submit any requests or objections in writing to: **Jarard Cassem** at info@quatrefoils.co.uk or alternatively write to: **Quatrefoils Ltd, Brooke House, 54a Cowley Mill Road, Uxbridge, UB8 2FX.**

How We Store and Process Your Data

We are committed to retaining your personal data only for as long as necessary to fulfill the purposes for which it was collected, including meeting legal, accounting, and reporting obligations.

When determining the appropriate retention period for personal data, we take into account factors such as the quantity, nature, and sensitivity of the data, the potential risks associated with unauthorised use or disclosure, the purposes of processing the data, alternative means of achieving those purposes, and applicable legal requirements.

In compliance with ISO 9001:2015 standards and legal obligations, we are required to retain basic customer information (including Contact, Identity, Financial, and Transaction Data) for a period of six years after the termination of their customer status for tax purposes. However, in certain circumstances, you have the right to request the deletion of your data. Further information on this is provided below. Additionally, we may anonymise your personal data for research or statistical purposes, in which case the information may be used indefinitely without further notice to you.

Your account data will be collected, stored, and processed exclusively within the UK. This data will be retained in accordance with the aforementioned six-year period or until you request the removal of your personal data from our system. Please note that if there is an ongoing transaction associated with your account, we may be unable to fulfill your request for removal. To provide updates and offers of potential interest to you, we engage recognized third parties for payment processing, company account management, and banking services. We will store transactions, payment (excluding payment card data), and order data for a maximum of seven years or as long as required by UK financial and company regulations. It should be noted that these third parties may operate outside the EU.

We will only use your personal data when legally permitted to do so. The most common uses of your personal data are:

- ❖ When it is necessary to perform the contract between us.
- ❖ When it is necessary for our legitimate interests (or those of a third party), provided that your interests and fundamental rights do not override those interests.
- ❖ When we need to comply with a legal or regulatory obligation.

In general, we do not rely on consent as a legal basis for processing your personal data, except in relation to sending marketing communications via email or text message. You have the right to withdraw your consent for marketing at any time by contacting us.

Outlined below are the specific ways in which we intend to use your personal data and the legal grounds on which we will process it. We have also provided an explanation of our legitimate interests, where relevant.

Please contact us via email if you require details about the specific legal basis on which we are relying to process your personal data when multiple grounds are set out in the table below.

Purpose / Activity	Data Type	Lawful basis for processing
Register you are a new customer/client	(a) Identity (b) Contact	Performance of a contract with you.
To process and deliver your order including managing payments, fees and charges, and to collect and recover money owed to us.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing & Comms.	1. Performance of a contract with you. 2. Necessary for our legitimate interests to recover debts owed to us.
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy, and asking you to leave a review or take a client feedback survey for services completed.	(a) Identity (b) Contact (c) Company profile (d) Marketing & Comms.	1. Performance of a contract with you. 2. Necessary for our legitimate interests to keep our records updated and to study and measure our client satisfaction to further improve services.
To enable you to partake in a prize draw, competition, complete a survey or similar company offering.	(a) Identity (b) Contact (c) Profile (d) Usage	1. Performance of a contract with you.

	(e) Marketing & Comms.	2. Necessary for our legitimate interests to study how customers use our services to develop them and continue to grow our business.
To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity (b) Contact (c) Technical	1. Necessary for our legitimate interests of running our business, provision of administration and I.T. services, network security to prevent fraud and in the context of a business restructuring exercise or event. 2. Necessary to comply with legal obligations.
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Comms. (f) Technical	1. Necessary for our legitimate interests to study how customers use our services to develop them, to grow our business, and to inform our marketing team on strategy.
To use data analytics to improve our website, products and services, marketing, customer relationships and experiences.	(a) Technical (b) Usage	1. Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing team on strategy.
To make suggestions and recommendations to you about goods and services that may be of interest to you.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Comms. (f) Technical	1. Necessary for our legitimate interests to develop our product/services and grow our business in an organic way.

We will only use your personal data 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. We are committed to ensuring that your personal data is not kept for longer than necessary for its intended purpose. If you would like more information about how the processing for the new purpose is compatible with the original purpose, please contact us via email.

In the event that we need to use your personal data for a purpose unrelated to the purpose for which we collected it, we will notify you and provide an explanation of the legal grounds for processing.

Please note that there may be circumstances where we are required or permitted by law to process your personal data without your knowledge or consent. We will ensure that such processing is conducted in accordance with applicable legal requirements.

Marketing Communications

You may receive marketing communications from us if:

- ❖ You have requested information from us or purchased goods or services.
- ❖ You have provided your details and opted in to receive marketing communications at the time of providing your information.
- ❖ You have not opted out of receiving marketing communications.

We will obtain your explicit opt-in consent before sharing your personal data with any third party for marketing purposes. You can unsubscribe from receiving marketing messages at any time by emailing us at info@quatrefoils.co.uk.

Please note that opting out of marketing communications does not apply to personal data provided to us as a result of product/service purchases, warranty registration, product/service experience, or other transactions.

Our Obligations

As a data controller, we are legally responsible for the information you provide to us. We will comply with the Data Protection Act 1998 and the GDPR (2018) in the handling, use, and sharing of your personal data. This means that we will only use your personal data:

- ❖ Fairly and lawfully
- ❖ As outlined in the legislation and this policy
- ❖ To the extent necessary for the stated purposes

We will process your personal data internally as the data processor and take reasonable precautions to protect the personal information you provide. Quatrefoils assures you that your data will not be transferred outside of the U.K.

Quatrefoils may occasionally use your information for marketing, account management, or relationship management purposes. The primary purpose is to provide you with information about goods and services we believe may be of interest to you and/or maintain any existing relationship we have with you.

Third Parties

Your data is only shared with third parties as described below:

- ❖ The data you submit during the purchase of a product.
- ❖ With your consent during the purchase of a product, for sending marketing information about goods and services that may be of interest to you, as well as for account management or relationship management purposes.

In addition, we may need to share your personal data with the following parties for the purposes outlined in the previous sections:

- ❖ Service providers who offer IT and system administration services.
- ❖ Professional advisers, including lawyers, bankers, auditors, and insurers, who provide consultancy, banking, legal, insurance, and accounting services.
- ❖ HM Revenue & Customs, regulators, and other relevant authorities based in the United Kingdom and other jurisdictions, as required by certain reporting obligations.

We require all third parties to whom we transfer your data to respect the security of your personal data and treat it in accordance with the law. We only permit such third parties to process your personal data for specified purposes and in accordance with our instructions.

Please note that you can configure your browser settings to refuse or alert you about cookies being set or accessed by websites. However, disabling or refusing cookies may result in certain parts of this website becoming inaccessible or functioning improperly.

Security

We have implemented appropriate security measures to prevent accidental loss, unauthorised access, alteration, or disclosure of your personal data. Additionally, access to your personal data is restricted to employees, agents, contractors, and third parties who have a legitimate business need to know the

data. They will only process your personal data based on our instructions and are bound by confidentiality obligations.

Procedures are in place to address any suspected personal data breaches, and we will notify you and the relevant regulatory authorities of a breach if legally required to do so. We promptly report any breaches or potential breaches to the appropriate authorities within 24 hours and notify individuals affected by a breach within 72 hours.

Please note that this website may contain links to third-party websites, plug-ins, or applications. Clicking on those links or enabling 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. We encourage you to review the privacy notice of every website you visit when leaving our website.

If you have any questions or concerns regarding the usage of your data, please contact us.

Visitor Security

We have implemented security measures at our office, including sign-in processes and building access controls.

Visitors to our offices are required to sign in at the reception, and we maintain a record of visitors for a limited period. Our visitor records are securely stored and accessed only on a need-to-know basis, such as in the event of an accident.

Legitimate Interests

Under the Data Protection Act, we are allowed to share certain information with third parties for non-marketing purposes, including credit and risk assessment, identification and fraud prevention, debt collection, and returning assets to you.

Contacting Us, Exercising Your Information Rights, and Complaints

If you have any questions, comments, or wish to exercise your information rights regarding the personal data you have shared with us, or if you would like to file a complaint, please contact the Data Protection Officer at Quatrefoils. We will process subject access requests (SARs) within 20 days, and while SAR responses are usually free, we reserve the right to charge for excessive or unfounded requests. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

Complaints Procedure

Quatrefoils offers a complaints-handling procedure in accordance with the regulations of the Royal Institution of Chartered Surveyors. Should you be unhappy with the services or are dissatisfied with

how your personal data has been processed, you may contact your primary contact and data controller, Jarard Cassem, using the contact information provided in above sections.

If you remain unsatisfied, you have the right to directly approach the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

www.ico.org.uk

FAQs:

Who will use my data?	Quatrefoils Limited
What for?	Your data will be stored and processed in order to allow us to maintain your account, provide and deliver our professional services, send system updates, send offer details, process and store your transaction details and provide customer support and services to you.
What will happen?	We may utilise your information to send you systems information and updates, offers that we think you may be interested in.
What data will be stored?	Usually your registration details, usage information, transaction details and any preference information may be collected and stored as part of you visiting our website.
What data will be shared?	We will only share your information with any regulator or legal body that requests it unless you have provided prior consent.
How long will it be stored for?	Your data will be stored for a period of 6 years in accordance with the ISO:9001:2015 standards after completion date of a project/delivery of services. After this time, your account will be deleted. You can request account deletion at anytime.
Who can access my data?	Quatrefoils will never sell, share or otherwise distribute your data to any other third party.
How is my data kept secure?	Quatrefoils store all your data on a Global and industry leading secure and trusted data-protected cloud storage service provider. We utilise industry standard security protocols/technology to secure data.

Conclusion

At Quatrefoils, we prioritise the security and privacy of your personal data. We have implemented robust measures to protect your information and ensure its confidentiality. Our practices align with the requirements of the Data Protection Act and the GDPR, providing you with the assurance that your data is handled responsibly and in accordance with applicable laws. Your trust is important to us, and we are committed to maintaining the integrity and security of your personal data. If you have any further questions or concerns, please do not hesitate to contact us.



Signature:

Name: Jarard Cassem BSc. (Hons) MRICS MFPWS

Position: Director

Date: 1st July 2023