



4 Bloomsbury Square London WC1A 2RP

QMULI DATA PRIVACY POLICY

Date: **20 February 2023.**

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Reasons for update:

**Broaden the policy remit;
formatting to Qmuli policy style; various other amendments**

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DATA PRIVACY POLICY

1. Introduction to this Policy

Personal data privacy is important to Qmuli. This privacy policy explains how Qmuli collects, protects, uses and shares personal data that is held within Qmuli's website (qmuli.com) and ad.fast and ad.lib systems. By accessing these websites, you consent to the terms of this policy.

Qmuli collects the personal data that is contained within these websites in a fair and non-intrusive manner (e.g. when a person registers for use of ad.fast or when a user updates their account information). Qmuli respects the privacy of all its users.

Occasionally, Qmuli may also be provided with personal data regarding employees of publishers, other media owners or printers that is to be used as contact information for the delivery of advertising materials and made accessible to ad.fast and ad.lib users within those websites.

Qmuli recognises the need for appropriate protections and management of all personal data that it stores and processes. Qmuli adheres to the General Data Protection Regulation (GDPR) and is what is known as the 'Controller' of the personal data that we store and process within qmuli.com, ad.fast and ad.lib, as defined within the GDPR.

This privacy policy will help you understand what types of information Qmuli may collect, how that information may be used, and with whom the information may be shared.

2. What personal data do we collect?

We only collect basic personal data about you in order to conduct our ad.fast business and provide the relevant commercial services to you, our users and clients (or respond to your request for information on the qmuli.com website). We do not collect any sensitive personal data as defined within the GDPR. We will not collect any personal data from you that we do not need for normal business operation.

The personal data we collect includes:

- ◆ Contact Name
- ◆ Company Name
- ◆ Job Title
- ◆ Address and Postcode
- ◆ Email address
- ◆ IP address, Operating System (OS) and web browser details
- ◆ Contact phone number(s) including Office and Mobile number(s)



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3. Why do we collect your personal data?

We need to know your basic personal data for the following reasons:

- ◆ to build your personal profile on our systems;
- ◆ in order that we, Qmuli, may contact you to verify the information we hold about you and your organisation;
- ◆ to provide you or your company with invoices;
- ◆ to contact you for support purposes, which we provide using a combination of web chat, email and telephone services;
- ◆ to provide you with information regarding changes to the systems, pricing, etc.;
- ◆ to submit work for your approval and confirm job statuses (e.g. that your ad has been delivered);
- ◆ to inform others that you are the appropriate person to contact in certain circumstances; and
- ◆ to customise our websites and systems for you.

We will not pass on any personal data to any third party without your permission unless we are legally obliged to do so, or for the following reasons:

- ◆ to provide your contact details to publishers, other media owners and printers to whom we are delivering advertising materials on your behalf, so that they may contact you directly should there be any issues; or
- ◆ to provide your contact details, as a representative of a publisher, other media owner or printer, to those people using our systems to supply advertising materials, so that they may contact you directly should there be any issues.

4. What do we do with your personal data?

All the personal data we handle is processed only by our staff and regular contractors, all of whom have undergone personal data training, and understand and follow this Data Privacy Policy. All this personal data is located on servers solely within the UK or European Union (other than the information used within the Mailchimp CRM email management system and the tawk.to online messaging app – which, in both cases, is stored and managed in strict accordance with the GDPR legislation).

We have a Data Protection regime in place to oversee and ensure the effective and secure processing of your personal data. Privacy Information on the tawk.to system can be found at <https://www.tawk.to/data-protection/gdpr/>. More information can be provided on request, by emailing our Data Protection Officer*.



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5. What we would also like to do with your personal data

We would however like to use your name and email address to inform you in the future of our new or enhanced products and services (i.e. for Qmuli's marketing purposes). This information is not shared with any third parties other than the Mailchimp CRM email solution we use (www.mailchimp.com) and they will not pass it to any other third party, so you will not receive marketing communications from other companies as a result of us holding your contact details.

You can unsubscribe at any time by contacting us via phone or email, or by using the unsubscribe link at the bottom of those emails.

New users can opt out when completing the registration process and all users are required to confirm their preferences at least once every 12 months.

We will not pass on any personal data to any third party (other than as explained above) for marketing or sales purposes. We will only pass your information on to any other third party when we are legally obliged to do so.

6. How long do we keep your personal data?

We are required under UK law to retain all invoices for a minimum of 7 years. Any personal data that is included within those invoices will be retained in those invoices for that period. Other than information on those invoices, when a user has stopped using the ad.fast system for 12 months, their account is made inactive, and after a further 12 months the account/personal details are deleted.

Any personal data within ad.lib (i.e. publisher contact details) is provided by the publishers and is edited or deleted on their instructions.

More information on our retention schedule is available on request, via email to our Data Protection Officer*.

7. What are your rights?

If at any point you believe that your personal data that we process is incorrect, you may request to see a copy of this information and have it corrected or deleted (unless we are required by law to retain it). If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Officer* who will investigate the matter.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner's Office (<https://ico.org.uk>).



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8. Financial information

We do not hold any data regarding your credit or debit cards, or your bank accounts. Our credit and debit card transactions are managed by PayPal, and it is they who handle the on-line purchases, including details of your credit or debit cards. Our direct debit transactions are managed by GoCardless, and it is they who handle all the information regarding your bank account details.

PayPal can be contacted via their website www.paypal.com. GoCardless can be contacted via their website www.gocardless.com.

9. Policy Updates

If Qmuli becomes aware of any requirement to update this policy, it will implement the necessary changes to both policy and all accompanying records. If the change is considered sufficient to warrant it, an updated policy document will be released and made available on its websites. Qmuli reviews and updates this policy once every two years as a minimum.

10. Director Sign Off

This policy is accurate and complete to the best of my knowledge.

A handwritten signature in brown ink that reads "Marcus Kirby".

Marcus Kirby
Director

Date: 20 February 2023

Reason for update:

Broaden policy remit; reformat to Qmuli policy style; various other amendments

*Our Data Protection Officer is Marcus Kirby (marcus.kirby@qmuli.com).