

# **QSL's Privacy Policy**

Quality Sales Leads Limited ("QSL", "we", "us", "our") is a UK limited company registered under companies house (07532460) that provides business to business "B2B" lead generation and sales consultancy services (the "Services") and is registered with the ICO (ZA872785). In providing the Services, we contact businesses on behalf of our clients to discuss solutions and services in which they may be interested in. This Privacy Policy sets out the data processing practices carried out through the operation of our Services and the use of our website.

Please note that all data captured and processed by QSL Ltd will be done so in accordance with the applicable data protection laws, including GDPR.

#### Information collected

The information we collect about individuals will always be business related information – such as name, employer, title and business contact details. This information is either provided to us directly by the business, provided to us from our customers, or collected by us from third parties and publicly available sources.

We also collect information from visitors to our website through the use of online forms and contact us pages. We may also collect your details when you email us with an inquiry.

In addition to the above, we collect information automatically about your visit to our website. Please see our Cookies Section for more details.

QSL relies upon its own and its clients' 'Legitimate Interests' as the lawful basis for processing personal data or consent where given.

It is in ours and our clients' legitimate interest to process personal data for the purposes of;

- B2B sales outreach (including direct marketing) and delivering our/their business services;
- Communicating with you and our/their other clients and suppliers;
- Detecting and preventing activity which is contrary to our/their legitimate interests;
- Other activities which may be or become legitimate from time to time and of which we/they shall make the relevant data subjects aware at the relevant time.

Outside of consent, QSL rely upon 'Legitimate Interests' and not some other legal basis for processing personal data because:

- We only process data relating to company representatives (no sole traders or unlimited partnerships);
- We only process data relating to companies which have not registered on the Corporate Telephone Preference Service;
- We only process data relating to companies and company representatives where there is a
  potential alignment with ours or our clients offering
- We only process data of companies and company representatives who have not previously objected to our processing of their personal data.
- The data we process is very unlikely to affect the fundamental rights and freedoms of the data subjects because we only ever process information that is in the public domain or that has been given to us freely by the data subject or their company;



- We and our clients only use the processed data for business to business (B2B) Sales outreach purposes and not for marketing or sales outreach to individual consumers (B2C);
- We and our clients only process data for direct sales outreach by human interaction and not for marketing by automated telephone calls or mass email marketing

### Use of personal information

In accordance with data protection laws, we will only process your personal data where we have a lawful basis for doing so. In respect of your personal data, these bases are: (i) where you have given your consent; and (ii) where it is in our (or a third party's) legitimate interests to process your personal data, provided that none of these prejudice your own fundamental rights or freedoms.

Primarily, QSL collects, receives and processes personal data of individuals in a business context to contact them about goods and services in which their business may be interested. This information is processed by QSL in accordance with its (and its' customers) legitimate interests.

# Marketing

Please note that your information may be used to send you details of those products or services that we (or our customers) offer that we have identified as likely to be of interest to you.

At the completion of any campaigns on behalf of our customers, the contact details of anyone who has expressed an interest in the goods and services offered will be passed back to our customers.

You will always have the right to opt-out of receiving marketing. If you would like to opt-out of any communications from us or limit the channels in which we contact you (such as email, phone or post only), please contact us - dataprotection@qualitysalesleads.co.uk.

Please note that even if you opt-out we may still receive your details from third parties and our customers in relation to specific campaigns and you may therefore need to notify our customers in order to opt-out.

#### **International Data Transfer**

Our clients operate around the world, which means that your personal data may be transferred to and processed in countries other than the UK. However, we require that our clients shall only transfer shared personal data outside the UK if they first ensure that:

- The transfer is to a country approved as providing adequate protection pursuant to Article 45 of the UK-GDPR; or
- There are appropriate safeguards in place pursuant to Article 46 of the UK-GDPR; or
- One of the derogations for specific situations in Article 49 of the UK-GDPR applies to the transfer.



### **Disclosures**

We will share your data with our customers where you have expressed an interest in their goods and services. We may also share your data with third parties but only where: (i) they process your data on our behalf and in accordance with this Privacy Policy; (ii) we have a written contract with the processor ensuring that your data is protected.

Other than as set out above, we will not share your data with third parties unless we are obliged to disclose personal data by law, or the disclosure is necessary for purposes of legal proceedings, national security, taxation, or criminal investigation; or where we have your consent; or in relation to a takeover, merger or asset sale of our business.

# Your rights

You have the following rights:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove
  personal information where there is no good reason for us continuing to process it. You also
  have the right to ask us to delete or remove your personal information where you have
  exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate
  interest (or those of a third party) and there is something about your particular situation which
  makes you want to object to processing on this ground and where we do not have compelling
  legitimate interests to override such objection. You also have the right to object where we are
  processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us
  to suspend the processing of personal information about you, for example if you want us to
  establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive, or refuse to comply with a request in these circumstances.

If you would like to exercise any of your rights please contact us: dataprotection@qualitysalesleads.co.uk

You also have the right to complain to the Information Commissioner's Office in respect of the processing of your personal data <a href="here">here</a>

### **Internet-based transfers**

Given that the Internet is a global environment, using it to collect and process personal data necessarily involves the transmission of data on an international basis. This means for instance that data you pass to us may be processed outside the European Economic Area (such as the USA). We



will always take all reasonable steps to ensure adequate measures are in place to keep your data secure in line with the requirements of UK data protection legislation (including by putting in place European Commission-approved standard contractual clauses or by transferring personal data to jurisdictions which the European Commission recognises as providing adequate protection, such to the USA, if companies are signed up to the Privacy Shield scheme).

#### Use of cookies

A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information from the browser. Find out more about cookies and how to disable them here.

We use cookies to identify you when you visit this website and to keep track of your browsing patterns and build up a demographic profile. Most browsers will allow you to turn off cookies. If you want to know how to do this please look at the menu on your browser. Please note however that turning off cookies will restrict your use of our website.

By continuing to use this site you are agreeing to the use of cookies as detailed above.

### Retention

We will only retain your data for as long as is necessary in accordance with the purposes set out in this Privacy Policy, and in any event no longer than 2 years from last contact.

Please note that if you opt-out of any marketing we will retain a record of your data to ensure that you do not receive any future marketing.

### **Amendments**

Please note that this Privacy Policy is subject to change from time to time. It was last reviewed in November 2022.

## **Contact Us**

If you have any questions or concerns about this Privacy Policy or our use of your personal data, please contact our Data Controller - dataprotection@qualitysalesleads.co.uk