DATA PROTECTION POLICY

Quorum Executive Partners Ltd

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Version	1.0
Classification	Internal · Compliance
Regulatory Basis	UK GDPR · Data Protection Act 2018 · ICO Registration

This policy sets out how Quorum Executive Partners Ltd collects, holds, uses and protects personal data in the course of its business. All data processing is conducted in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

INTRODUCTION AND SCOPE

Quorum Executive Partners Ltd ("the Company", "we", "us") is a professional services practice providing executive support and operational delivery. In the course of our work we handle personal data relating to clients, client employees, stakeholders and prospective clients.

This policy applies to all personal data processed by or on behalf of the Company, regardless of the format in which that data is held. It applies to the founder, any associates, subcontractors, or third parties acting on behalf of the Company.

This policy does not form part of any contract of employment or engagement and may be updated at any time. The current version is maintained in the QEP — Legal & Compliance folder.

DATA PROTECTION PRINCIPLES

We are committed to processing personal data in accordance with the six data protection principles set out in Article 5 of the UK GDPR. All personal data we hold must be:

— **Processed lawfully, fairly and transparently** — we will always have a lawful basis for processing and will be clear about how data is used.

— **Collected for specified, explicit and legitimate purposes** — data will not be used in ways incompatible with the purpose for which it was collected.

— **Adequate, relevant and limited to what is necessary** — we will only collect the minimum data required for the purpose.

— **Accurate and kept up to date** — we will take reasonable steps to ensure data is accurate and correct any inaccuracies without delay.

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— **Retained only as long as necessary** — data will not be kept longer than required for its stated purpose. See our retention schedule in Section 7.

— **Processed securely** — appropriate technical and organisational measures will be in place to protect personal data against unauthorised access, loss or destruction.

WHAT PERSONAL DATA WE HOLD

In the course of our business we may process the following categories of personal data:

Client and prospective client data

— Full name, job title and employing organisation

— Business email address and telephone number

— Correspondence and meeting notes

— Information shared during the course of an engagement

— Contractual and financial information relating to the engagement

Third party data encountered during engagements

In carrying out client work, we may encounter personal data relating to third parties — for example, names referenced in board papers, correspondence or internal documents. Such data is processed solely for the purpose of performing the engagement and is subject to the same protections as client data.

Website and enquiry data

— Name and contact details submitted via the website contact form

— IP addresses and anonymised analytics data via website hosting

LAWFUL BASIS FOR PROCESSING

We rely on the following lawful bases for processing personal data:

Lawful Basis	When We Use It
Contract	Processing necessary for the performance of a Consultancy Services Agreement with a client.
Legitimate interests	Business development, outreach to prospective clients, maintaining records of past engagements.
Legal obligation	Compliance with tax, accounting or other legal requirements.
Consent	Where we have obtained explicit consent, for example for marketing communications.

HOW WE PROTECT PERSONAL DATA

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We take the security of personal data seriously. The following measures are in place:

— Client communications are conducted via a dedicated business email address with two-factor authentication enabled.

— Documents containing personal data are stored in password-protected cloud storage with access restricted to authorised users only.

— Paper documents containing personal data are stored securely and disposed of by secure shredding.

— Personal data is not shared with any third party without a legitimate basis for doing so.

— Where AI or digital tools are used to support work tasks, client names, personal data and sensitive content are never entered into such tools.

— Devices used for client work are protected by strong passwords and, where applicable, encryption.

— Any subcontractors or associates engaged to support client work are required to handle personal data in accordance with this policy.

SHARING PERSONAL DATA

We do not sell, rent or trade personal data. We will only share personal data in the following circumstances:

— **With the client's own organisation**, in the course of performing the engagement and where authorised to do so.

— **With professional advisers** such as accountants or legal advisers, where necessary and under appropriate confidentiality obligations.

— **With regulatory bodies** such as HMRC, where required by law.

— **With technology service providers** (e.g. cloud storage, email hosting) where those providers are subject to appropriate data processing agreements.

We do not transfer personal data outside of the UK or European Economic Area unless appropriate safeguards are in place in accordance with UK GDPR requirements.

DATA RETENTION

We will not retain personal data for longer than is necessary for the purpose for which it was collected. Our retention schedule is as follows:

Data Type	Retention Period	Reason
Client contracts and engagement records	7 years from end of engagement	Tax and legal obligation
Client correspondence and working documents	3 years from end of engagement	Legitimate interests
Financial records and invoices	7 years	HMRC requirement
Prospective client contact data	2 years from last contact	Legitimate interests

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Website enquiry data	12 months from receipt	Legitimate interests

At the end of the applicable retention period, personal data will be securely deleted or destroyed.

INDIVIDUAL RIGHTS

Under UK GDPR, individuals whose data we hold have the following rights:

— **Right of access** — the right to request a copy of the personal data we hold about them.

— **Right to rectification** — the right to have inaccurate data corrected.

— **Right to erasure** — the right to request deletion of their data where there is no longer a lawful basis to hold it.

— **Right to restrict processing** — the right to limit how their data is used in certain circumstances.

— **Right to data portability** — the right to receive their data in a structured, commonly used format.

— **Right to object** — the right to object to processing based on legitimate interests or for direct marketing.

Requests to exercise any of these rights should be directed to efua@quorumexecutivepartners.co.uk. We will respond within one calendar month of receiving a valid request. There is no charge for exercising these rights in most circumstances.

DATA BREACHES

A personal data breach is any incident that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

In the event of a suspected or actual data breach, the following steps will be taken:

1. The breach will be contained as quickly as possible — access revoked, systems secured, affected data identified.

2. The severity of the breach will be assessed — what data was affected, how many individuals, what the likely impact is.

3. If the breach is likely to result in a risk to individuals' rights and freedoms, it will be reported to the ICO within 72 hours of discovery.

4. If the breach is likely to result in a high risk to individuals, those individuals will be notified directly without undue delay.

5. A record of the breach, the assessment and any action taken will be maintained.

ICO REGISTRATION AND CONTACT

Quorum Executive Partners Ltd is registered with the Information Commissioner's Office (ICO) as a data controller.

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ICO Registration No.	ZC148376
Data Controller	Efua Sintim, Quorum Executive Partners Ltd
Contact for Data Matters	efua@quorumexecutivepartners.co.uk
ICO Helpline	0303 123 1113 · www.ico.org.uk

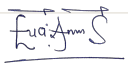
Any individual who is dissatisfied with how their personal data has been handled has the right to lodge a complaint with the ICO at www.ico.org.uk.

POLICY REVIEW AND UPDATES

This policy will be reviewed annually or following any significant change to the business, its activities, or applicable data protection legislation. The current version is always held in the QEP — Legal & Compliance folder.

All material updates to this policy will be documented with a version number and the date of the update.

> *This policy has been adopted by Quorum Executive Partners Ltd and will be applied to all personal data processing carried out by the Company and on its behalf.*

Adopted by	Efua Sintim, Founder — Quorum Executive Partners Ltd
Signature	

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