



**Privacy policy**  
**The Quantum Group**  
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# Privacy policy

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## 1. About Quantum

The Quantum Group (**Quantium**) is an international group of companies with our head office based in Australia, and with offices in India, New Zealand, South Africa, United Kingdom and USA. The nature of our business, the type of work we do, our business partners and the types of clients we work for are outlined on our website [www.quantium.com](http://www.quantium.com). Our core business is to assist our clients to better understand their customers and suppliers.

## 2. Purpose of this Privacy policy

This Privacy policy (**Policy**) relates to The Quantum Group Holdings Pty Limited (ACN 121 842 957), Quantum Health Australia Pty Ltd (ACN 614 088 363) and each of their subsidiaries. Its purpose is to describe how we collect and use data, including personal information in the course of our business and through our website, and to show how we comply with applicable privacy laws. We are committed to protecting individuals' privacy, and all information collected by us is done by lawful and fair means in accordance with this Policy. If you have any questions regarding the contents of this Policy or how we handle your data, we invite you to contact our Privacy Office.

We are ISO/IEC 27001 certified. Information security is our top priority and fundamental to us in everything we do. We implement processes and safeguards that have been designed by us to meet the privacy and data protection laws applicable to our business. These processes and safeguards focus on privacy by design and default, information security, and minimisation of handling the personal information of individuals.

This Privacy policy does not apply to our clients or other third parties. Each client and each provider of data to Quantum is responsible for providing and complying with its own privacy policy and complying with all privacy and data protection laws applicable to them. Please refer to the privacy policy, statement or notice of the entities with whom you engage, or whose internet sites, mobile applications and other online services you access, to learn how they collect and use information about you.

## 3. What is personal or sensitive information?

- 'Personal information' is information or an opinion about an individual who is identified or is identifiable.
- 'Sensitive information' includes information or an opinion about an individual's race or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional association, trade association or a trade union, sexual orientation and sex life, criminal record, and certain biometric data. Sensitive Information also includes health and genetic information about an individual.

## 4. Quantum's Core Business

### 4.1. Our clients' data

- a. We work with a number of clients who include, for example, supermarkets, banks, insurance companies, telecommunications providers, and government agencies. Our core business involves receipt and handling of data for the purposes of providing services to those clients. We rely on contractual obligations with our clients and partners to obtain any necessary permissions before disclosing information to

Quantium. The data we receive from our clients contains information about their transactions with their customers or suppliers. Our clients provide this data in de-identified form, after they remove the personal identifiers of any individual person, so that an individual person is not identified or reasonably identifiable by us. We generally do not handle personal information in our core business, except where that personal data relates to our clients' use of tools we provide them, such as the contact details of our clients' authorised users.

- b. In exceptional circumstances, where we agree to work on client engagements that involve analysis of personal data held by our clients, we ensure that such work is done in accordance with strict protocols and safeguards that have been established by us to comply with relevant privacy and data protection laws, and to mitigate associated risks. These engagements are reviewed and approved by our senior leadership, and data relating to these engagements is only accessed by a limited number of specially authorised Quantium personnel, where required for the delivery of services to the relevant clients. These engagements are usually performed by accessing the personal information in our clients' systems, behind their firewalls, and in such circumstances we do not disclose or transmit any personal information to Quantium. When we work in our clients' environments, we always abide by the privacy controls and policies agreed with our clients with respect to our access. Where we are requested by our clients to store personal information on our systems, it is held in a data handling environment isolated and separated from our de-identified data environment with strict controls, including technical, physical and operational safeguards. When these engagements conclude, we return or destroy the data, as directed by our clients.
- c. Outside the exceptional circumstances described above, where we receive any personal information from our clients in error (including where any information we receive from our client is capable of re-identifying an individual), we will promptly notify the client and delete such information.

#### 4.2. B. How we derive insights from data for our clients

- a. The core services provided by Quantium to its clients derive insights for clients that are provided at levels of aggregation or other de-identification.
- b. Information about de-identified individuals that are customers of our clients is protected by technical, physical, operational and legal controls and safeguards designed to restrict our ability to identify an individual customer of a Quantium client.
- c. In our core business data is generally provided to Quantium in de-identified form after personal identifiers of individuals have been removed by our clients but with code that enables a single unique de-identified transactor to be associated with the data sets made available to Quantium by different Quantium clients. This is done through a de-identified code linkage process. Using this process Quantium may draw inferences about an unidentified individual's behaviours, interests and preferences, and use these inferences to provide insights reports to our clients which they may use to improve the customer experience that they offer.
- d. Where insights from Quantium's data analytics services are provided to our clients at an individual level, these insights are provided as modelled scores that are applied to de-identified data sets. Modelled scores are probabilities that a de-identified individual within any data set may behave in a particular way. The provision of any modelled scores to a client is subject to strict contractual provisions that require that the client use such modelled scores in compliance with all applicable privacy laws.
- e. We use data provided to us by our clients to provide, maintain, improve or develop the services we offer to them, which may include undertaking pricing, planning, research and statistical analysis on their data sets. In this instance, we will only disclose our analysis to the client that provided the data to us. For the avoidance of doubt, information provided by a client to enable the delivery of these services will only be used for that purpose and will not be used by us for any other purpose without the prior written consent of that client.

## 5. What information we collect from you

Any personal information collected by us in the course of our operations, is collected with consent, pursuant to a legitimate interest as explained below, or in connection with a contract, by lawful and fair means and in accordance with this Policy. We collect and hold certain personal information about you that is required for one or more of our business functions or activities, as follows:

- Internal Operations Purposes: we collect personal and sensitive information for recruitment, employment, business, operational, administrative or security purposes.
- External Operations Purposes: we collect personal information to maintain contact with our business clients, to provide access to our services and tools, inform them of our products and services, to update them on industry developments and to connect with them through seminars and other events we hold, or to otherwise undertake business to business direct marketing activities and to improve our offerings.

The type of personal information collected about you, and/or received and used by us will depend on the functions and activities that are relevant for the collection purpose as follows:

- Internal Operations Purposes: the information we collect may include your photo, name, birth date, race/ethnic origin, physical address, e-mail addresses, contact details (including contact details of your emergency contact), relevant medical information such as information about disabilities or allergies, tax file number, financial information (such as bank account details), work history, professional memberships, references and personal background checks, and video security surveillance which includes monitoring of building access and our premises, and electronic monitoring of our systems and devices and may include IP and geolocation data;
- External Operations Purposes: the information we collect may include your name, job title, your business contact details, including business address, IP address and mobile phone numbers, photos, videos, as well as any relevant medical information such as information about disabilities or allergies for purposes of premises accommodation or catering requests.

Where we collect personal information directly from you, before or at the time of information collection, we will provide you with our contact details and the appropriate privacy disclosures. Where we collect personal information about you from a third party, for example marketing lead generation services, we will provide you with our contact details and appropriate privacy-related disclosures when we first contact you. If you prefer not to be contacted by us in the future, please follow the "opt-out" or "unsubscribe" instructions in the communication that you receive from us or contact our Privacy Office. We will promptly attend to your request.

## 6. Your right to anonymity and pseudonymity

Nothing in this Policy restricts your option to not identify yourself or use a pseudonym when dealing with us, except where:

- a. we are required or authorised by or under law, or court/tribunal order, to deal with an individual who has identified themselves; or
- b. it is impractical for us to deal with an individual who has not identified themselves or who has used a pseudonym (in a job application for example).

## 7. How we use the information we collect from you

We use personal information in a manner that is consistent with the reason for which it was provided to us. Quantum is required by law to collect certain personal information, for example, when entering into an employment agreement, Quantum is required to collect a tax identification/social security number. We will only use your personal information if it is relevant for one or more of our functions and activities. Such uses include:

- Internal Business Purposes: we use personal and sensitive information for recruitment, employment, business, operational and administrative or security purposes.
- External Business Purposes: we use personal information to maintain contact with our business clients, to provide access to our services and tools, inform them of our products and services, to update them on industry developments and to connect with them through seminars and other events we hold, or to otherwise undertake business to business direct marketing activities and to improve our offerings.

We will not use your personal information for a further purpose unless:

- a. that other purpose is compatible with the original purpose of collection, and where this relates to sensitive information, such further purpose is directly related to the original purpose of collection;
- b. you consent to us using your information for a further purpose; or
- c. such other use or purpose is required, authorised or permitted by law.

## 8. How we share the information we collect

We do not sell the personal information we collect, but we may use or disclose such personal information for the purposes described in this Policy with:

- a. our related bodies corporate, Quantum Health and its related bodies corporate and shareholders
- b. third party suppliers and service providers (including providers for the operation of our websites);
- c. anyone to whom our assets or businesses (or any part of them) are transferred;
- d. specific third parties authorised by you to receive information held by us; and/or
- e. other persons, including government agencies, regulatory bodies and law enforcement agencies, or as otherwise may be required, authorised or permitted by law.

## 9. How we secure and store information

### 9.1. Security

We place a high degree of importance on data security and take all reasonable steps to protect any personal information that we hold from misuse, interference, loss, unauthorised access, modification or disclosure. These steps include:

- a. storage of such information in a secure environment, generally, on our systems in Australia;
- b. maintaining strict protocols regarding data access;
- c. restricting access to persons for whom such access is reasonable and necessary, including password protection and restricted physical access;
- d. the use of up-to-date hardware and software security measures; and
- e. robust processes and procedures for regular review of protections we have in place to monitor their effectiveness.



## 9.2. Storage

We retain personal information for a period necessary to fulfill the purposes for which we collect or receive it and any further purposes as described in more detail in Section 7.

When no longer required, Quantum will delete or de-identify the personal information promptly, in a secure manner.

Where we receive any personal information which we did not request, or otherwise in error, we shall, as soon as practicable, destroy that information or ensure that the information is de-identified. Our employees receive training to enable them to identify personal information received by us in error.

## 10. How we may transfer information internationally

Quantum is an international business. We may share personal information about you with our overseas offices or our service providers for internal business purposes as described in more detail in Section 7 "How we use the information we collect."

We may also be required by a client to disclose personal information that has been provided to us by them with an overseas recipient, generally a related body of that client, for the purposes of delivering our services.

We transfer such information as follows:

- a. in accordance with any applicable laws, including, where appropriate, an adequacy decision or standard data protection clauses; and
- b. where applicable, with the approval of our client.

## 11. Your rights

You have certain rights with respect to your personal information in accordance with privacy laws that apply to you. To exercise these rights please contact our Privacy Office and we will promptly assist you with your request.

1. Right to access. You may request access to your personal information held by us by contacting our Privacy Office at the contact information provided in Section 14 below. We will provide you with such access, subject to relevant applicable laws.
2. Right to rectification. You may request that we correct any inaccurate personal information we hold about you. We try to ensure that the personal information we hold is accurate, up to date and complete. This includes maintaining and updating our records when we are advised by you of a change to your personal information.
3. Right to erasure. In some circumstances, you have the right to request that we erase the personal information we hold about you.
4. Right to restrict processing. In some circumstances, you have the right to require us to restrict processing of your personal information.
5. Right to object. You have the right to object to any direct marketing or to other processing of your personal information.
6. Right to withdraw consent. You have the right to withdraw consent to us processing your personal information, please note however, such withdrawal will apply to future processing and does not apply to processing of your information that has already occurred based on your prior consent.

7. Right to not to be subject to decisions based on automated processing. In some circumstances, you have the right not to be subject to decisions based solely on automated processing, and to obtain the human review of any such decisions that significantly affect you.
8. Right to complain. You have the right to lodge a complaint regarding our use of your personal information with us or with a supervisory authority. We would appreciate the chance to resolve your concern by investigating and correcting the issue so please contact our Privacy Office in the first instance.
9. Right to not be discriminated against. You have a right not to be discriminated against for exercising any of your other privacy rights. You may exercise any of your rights contained in this section without us discriminating against you in any way.

## 12. Cookies and anonymous identifiers

A cookie is a small file containing information specific to a user, passed through an internet protocol such as a web browser and stored on a device.

We use essential cookies to operate our website and deliver our services. We will not install non-essential cookies without your consent. Cookies and similar technology help us evaluate access to and use of our website, and our website visitors' response and interaction with our marketing materials. The information gathered is used by us to improve our website and the services we provide to our customers.

## 13. Data collected from children

We do not knowingly collect personal information from anyone under the age of consent. If you believe that we may have collected, without parental consent, personal information from someone under the age of thirteen, or under the applicable age of consent in your country, please contact our Privacy Office so that we may promptly investigate and resolve the issue.

## 14. Contact our Privacy Office

Please contact us at the details below, if:

- you wish to exercise any of your rights listed in Section 11;
- have questions related to our privacy practices or this Privacy policy; or
- wish to make a complaint about our handling of personal information.

Contact: Danny Boland  
Privacy Officer  
[privacy@quantium.com.au](mailto:privacy@quantium.com.au)

Address: The Quantium Group  
Bay 12, 2 Locomotive Street  
Eveleigh, NSW 2015  
Australia  
Phone: 61 (2) 9292 6400  
US Toll Free: 1 (800) 736-2244