



Privacy Policy  
The Quantium Group

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Privacy Policy.....	1
1. About Quantum.....	3
2. Purpose of this Privacy Policy.....	3
3. What is personal or sensitive information?.....	3
4. Quantum’s Core Business.....	4
5. What information we collect and how we use it.....	4
6. The right to anonymity and pseudonymity.....	5
7. How we share the information we collect.....	5
8. How we secure and store information.....	6
9. How we may transfer information internationally.....	6
10. Your rights.....	6
11. Interacting Digitally.....	7
12. Data collected from children.....	8
13. Contact our Privacy Officer.....	8

# Privacy Policy

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## 1. About Quantum

The Quantum Group (**Quantum**) is an international group of companies with its head office based in Australia, and with offices in India, New Zealand, South Africa, United Kingdom and USA.

Founded in 2002, Quantum is a data analytics firm with artificial intelligence, data science and data engineering skills. Its core business involves the application of these skills to assist its clients by analysing, understanding and deriving insights based on the client's own data, and providing those insights to that client as consulting services and/or products. Quantum primarily helps its clients use their data to inform better buying, pricing and resource allocation decisions and improve operational efficiency to better service their respective customers.

Quantum's majority shareholder is Woolworths Group Limited.

## 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 any 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 any 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 Officer (details provided in **Section 13** below).

This Policy does not apply to our clients, partners or other third parties. Each client and partner of 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.

Quantum has two joint ventures in Australia, namely CommBankiQ (partnering with Commonwealth Bank of Australia) and Quantum Telstra (partnering with Telstra) which are managed and governed separately to Quantum. The data sets and systems used within each of these joint ventures belong to Commonwealth Bank of Australia and Telstra respectively, and are each subject to separate and strict security controls and protocols. For more information on how these entities collect and use personal information, please see their respective privacy policies:

- For CBAiQ, see: <https://www.commbank.com.au/support/privacy.html>
- For Quantum Telstra, see: <https://www.telstra.com.au/privacy>

## 3. What is personal or sensitive information?

Any time we use the term "personal information" or "sensitive information" in this Policy, we are referring to the Australian legal definition of that term. That is:

- 'Personal information' is information or an opinion about an individual who is identified or is reasonably identifiable, whether or not it is true; and
- '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 the provision of data analytics and consulting services to our clients primarily using the clients' own data and access to the data is usually provided within the client's own technical environment. In the limited circumstances where Quantum may receive data from a client in its own systems, Quantum implements rigid technical standards and operational policies to protect and secure such data.
- b. Quantum places contractual obligations on its clients and partners to ensure that they have obtained the appropriate permissions and consents before disclosing any data to Quantum. When the data relates to individuals, our clients generally provide this data to Quantum in de-identified form using hashing and/or encryption keys unique to that client, after they remove the personal identifiers of any individual person, so that an individual person is not identified or reasonably identifiable by us.
- c. In exceptional circumstances, where Quantum may agree to work on client engagements that involve analysis of personal information held by our clients, we ensure that such work is done in accordance with strict protocols and safeguards to comply with relevant privacy and data protection laws, and to mitigate associated risks. These engagements are usually performed by accessing the personal information in our clients' systems, behind their firewalls, and in such circumstances, no personal information is disclosed or transferred to Quantum. 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. In rare circumstances, where we are required 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 environments with strict protocols and controls observed, including technical, physical and operational safeguards. When these engagements conclude, we either return or destroy the data, whichever is directed by our clients. Data relating to these engagements is only accessed by a limited number of specially authorised Quantum personnel, where, and only as, required for the delivery of services to the relevant clients.
- d. Should Quantum become aware that it has received any personal information from a client in error (including where any information we receive from our client is capable of re-identifying an individual), Quantum will notify the client within 24 hours and will promptly delete such information.

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

- a. In Quantum's core business, data is generally provided to Quantum by the client in de-identified form, meaning that personal identifiers of any individuals have been removed by the client. The client uses hashing and/or encryption keys unique to that client to provide Quantum a code that enables a single unique de-identified individual to be associated with the data set.
- b. The primary insights Quantum provides through its core business to each client are built on aggregated statistical trends based on large sample sizes. Data from unidentified individuals may, for example, be allocated to segmentations or cohorts for the purpose of providing analysis and insights at a segment or cohort level.
- c. In limited instances, Quantum may draw inferences about an unidentified individual's behaviours, interests and preferences, and use these inferences to provide insights reports back to the same client only. In relation to these services, Quantum does not share or sell its clients' data to third parties and only uses the client's data for the purpose it was provided to us.

## 5. What information we collect and how we use it

### 5.1. What information we collect in the course of our business operations

Quantum collects personal information directly from individuals for the purpose of undertaking its general

business operations. Quantum does **not** collect personal information from individuals in the course of our business operations for the purpose of undertaking data analytics on that information and providing it to clients.

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 that is required for one or more of our business functions or activities, as follows:

- Employment and Recruitment Purposes: we collect personal and sensitive information for recruitment, employment, operational or security purposes.
- Operations Purposes: we collect personal information to maintain contact with our business clients and suppliers, 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, and/or received and used by us will depend on the functions and activities that are relevant for the collection purpose as follows:

- Employment and Recruitment Purposes: the information we collect may include photograph, name, birth date, race/ethnic origin, physical address, e-mail addresses, contact details (including emergency contact and next of kin), relevant medical information such as information about disabilities or allergies, financial information (such as tax file numbers and bank account details), work history, professional memberships, references and personal background checks, and video security surveillance which includes monitoring of building access, and electronic monitoring of our systems and devices and may include IP and geolocation data.
- Operations Purposes: the information we collect may include name, job title, 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.

## 5.2. How we use it

We use personal information in a manner that is consistent with the purpose 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 not use personal information for a further purpose unless:

- a. that other purpose is related to 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 or specifically authorised by law.

## 6. The right to anonymity and pseudonymity

Nothing in this Policy restricts the 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 (for example, in a job application).

## 7. 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 obtained pursuant to **Section 5** for the purposes described in this Policy with:

- a. our related bodies corporate;
- 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. government agencies, regulatory bodies and law enforcement agencies, or as otherwise may be required, authorised or permitted by law.

## 8. How we secure and store information

Quantium is 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.

### 8.1. Security

We place a high degree of importance on data security and take 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;
- 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.

### 8.2. 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 5**.

When no longer required, Quantium 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.

## 9. How we may transfer information internationally

Quantium is an international business. We may share personal information with our overseas offices or our service providers for the purposes described in more detail in **Section 5**.

## 10. Your rights

You have certain rights with respect to personal information in accordance with privacy laws that apply to you. To exercise these rights please contact our Privacy Officer 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 Officer (see contact details at **Section 13**). To the extent any such information is held, 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 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 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 Officer 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.

As mentioned earlier in this Policy, Quantum is generally not able to identify an individual from a client's data set.

## 11. Interacting Digitally

Quantum uses digital technologies to automatically collect identifiers and information about your engagement with our website and products and services. The kinds of information we or our selected service providers collect when you interact with Quantum's website and products include:

- a. digital identifiers (such as your IP address), software, browser version and device type (e.g. mobile or computer);
- b. browsing behaviour (e.g. how you navigated our website, what you see, what you click);
- c. location by city/area;
- d. when using a Quantum product, usage statistics (e.g how and when you used Quantum's products).

The information gathered is used by us to improve our website, and the products and services we provide to our clients.

Quantum does not use digital technologies to track users on third party sites.

## 12. 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 Officer so that we may promptly investigate and resolve the issue.

## 13. Contact our Privacy Officer

Please contact us at the details below, if:

- you wish to exercise any of your rights listed in **Section 10**;
- have questions related to our privacy practices or this Policy; or
- wish to make a complaint about our handling of personal information.

Contact: **Privacy Officer**  
**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**