

## Qwarie Privacy Policy

### Introduction

Qwarie Ltd is a UK registered (10113351) Open Source Intelligence company providing OSINT research, training services and products. We are committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

Qwarie Privacy Policy is structured in two distinct sections according to the type of Personal Information we may collect, store and analyse. There is information we collect about you if you are a potential or current customer and there is information that we collect under instruction from our customers.

### Relevant Legislation

We comply with laws, regulations and guidelines pertaining to access, use, storage, protection and disclosure of personal information. Specifically, we comply with The Data Protection Act 1998.

Concerning the General Data Protection Regulation (GDPR), in the absence of legislation from HM Government in the UK, Qwarie has adopted EU Regulation 2016/679 of the European Parliament and of the Council, issued on 27 April 2016. This concerns the protection of natural persons with regard to the processing of personal data and the free movement of such data. GDPR is a minimum standard for data protection that comes into force on 25 May 2018.

Qwarie is fully compliant with The Data Protection Act 1998 and GDPR (2016/679).

To acquire the fuller extent of our compliance, please revert to the documents provided at <https://www.qwarie.com/documents>

### Our Policy

Before you use our service, we may have collected, stored and used very limited information about you, as part of our sales process. Where you choose to use our services, you agree to the collection, storage and use of your personal information so that we might provide our service to you.

This policy details the collection, storage, use and disclosure of personal information according to the type of information and the relationship we have with you.

## **PART 1: Personal Information concerning our customers, suppliers and partners**

We may collect, store and use the following kinds of personal information:

- information that is publicly available, or that which is disclosed in a signature file of an e-mail or otherwise disclosed to us by yourself, someone in your organisation or by some other persons by way of a referral or recommendation. The personal information might include your name, your mobile phone number and your e-mail address and other information about your business that might include your position in the company and your publicly available network inside and outside the company. Where you are a self-employed customer or supplier, we might hold this same information, that is personal to you.
- information that you provide to us for the purpose of subscribing to our e-mail notifications and/or newsletters that is your name and email address;
- any other personal information that you choose to provide to us.

### Use of Customer & Supplier Personal Information

We use your personal information to perform our business. This might include sending newsletters to you, any sales and marketing activity with you, adding you to our e-mail list to keep you updated on the changes in our policies and any matter in the performance of our contract with you.

### Disclosure and Transfer of Customer Personal Information

Customer Personal Information may be disclosed in a number of circumstances including the following:

- as required by law,
- in the event of a transfer of ownership, assets or a bankruptcy of our Company,
- where we determine that disclosure of specific information is necessary to comply with the request of a law enforcement or regulatory agency or other legal process, or
- to protect the interests or safety of our Company.

### Our Commitment to your Privacy

Where you are a customer, we do not sell or in any other way make available to any other party, any of your personal information.

Where you are a Supplier, from time to time, and in good faith, we might recommend your services to another party that is known to us, and pass to them your name and contact details, so that they might make contact with you to request your service.

## PART 2: Personal Information collected in the performance of our service

The OSINT research process gathers information about people from a variety of online social networking sites and other publicly available databases and websites. The information might be behind a paywall. We gather personal information about people as directed by our customers, within a specific instruction.

We research, save and report the personal information to our customer. We store a copy of the report that contains personal information no longer than is required by our customer.

During the OSINT research process we may collect, store and use information that has been made publicly available by you, or by another person or organisation. This information might include:

- names, contact details, gender, date of birth,
- relationship status, family information, friends and other human connections,
- your interests, activities pastimes, hobbies and beliefs
- memberships, employment and property details,
- publicly available legal documents about you, or that relate to you
- information contained within any publication or communication that is in the public domain and that is made by you, or to you, or is made by other people and is about you. This might include metadata associated with the communication.

## Data Types collected during the OSINT research process

Personal information collected during the research process is used for the sole purpose of providing our services to our customers. Our research aims to locate any relevant online publicly available content, that might be text, photographic or video.

Also, we might collect information about you for the purpose of marketing our service to you.

## Responsibility and Legal roles of our Customers

As our customer and before you disclose to us personal information about any other person, you shall have obtained that person's consent. This might have been obtained as part of your contract with the other person, so that they have agreed to both the disclosure and the processing of that personal information. In this instance, you are both the data controller and the data processor. You contract to us an obligation to gather personal information about other people, on your behalf.

Where you do not have consent to disclose to us the personal information about another person, you are investigating the other person, and you contract us to perform research for your investigation. We are not investigators.

## Disclosure of Personal Information collected during the OSINT research process

We are committed to providing complete confidentiality, so that personal information located during the research process shall remain private and shall be disclosed only to the party requesting the information.

## Confidentiality & Privacy

We accept that though all of the information we might have located about a person was, at the time the information was located about a person, in the public domain. We accept and anticipate that the information might be withdrawn from the public domain in the private domain, and that the intention of the removal of the information from the public domain is to make that information private.

We might have no record or knowledge of information being removed from the public domain. Therefore, we treat all information that has been located as confidential and private.

## Security of Personal Information

In compliance with GDPR we take the threat of data breach very seriously.

We have security measures in place to protect against data breach which might cause the loss, misuse, and alteration of the Personal Information submitted to us. We employ security measures consistent with best practice to protect against unauthorised access to personally identifiable information. For further information on our security plan and procedures, please revert to our Security Policy and Data Breach Policy.

## Access to your Personal Information

You may access the Personal Information we hold about you that is stored in our CRM. We can supply a login that shall display your Personal Information. Please contact us by e-mail on [info@qwarie.com](mailto:info@qwarie.com) and be tolerant of our vetting process so that we are sure you are the authentic contact.

## Notification of changes to this policy

From time to time we may make changes to this Privacy Policy to reflect any changes to our privacy practices in accordance with changes in legislation, best practice and technology enhancements. If you wish to be notified of changes to this policy, please subscribe to our e-mail list.

## References

To acquire the fuller extent of our compliance, please revert to the following documents:

- Qwarie Data Breach Policy
- Qwarie Security Policy
- Qwarie Data Protection Compliance Statement
- Qwarie Modern Slavery Policy
- Qwarie Customer Consent to Data Processing

To read or download our compliance documents, please go to <https://www.qwarie.com/documents>