UK GDPR Policy

Last updated	1st April 2026

Definitions

Company	means Q3
UK GDPR	UK GDPR means the United Kingdom General Data Protection Regulation, as incorporated into UK law by the Data Protection Act 2018 and amended from time to time.
Responsible Person	means Lucy Hayes
Register of Systems	means a register of all systems or contexts in which personal data is processed by the Q3

Data protection principles

Q3 Facilities Holdings Limited (Q3) (including all subsidiary companies such as Q3 Services Group Limited, Q3 Security Limited, Q3 Grounds Services Limited, Q3 Technical Services Limited and Q3 Services (CI) Limited) is committed to processing data in accordance with its responsibilities under the UK GDPR.

Article 5 of the UK GDPR requires that personal data shall be:

a. processed lawfully, fairly and in a transparent manner in relation to individuals;

b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;

c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer

©Q3 Services Group 2018 | Classification: Q3 Internal

periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the UK GDPR in order to safeguard the rights and freedoms of individuals; and

f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

General provisions

a. This policy applies to all personal data processed by Q3 and all business within the Q3 Group.

b. Depending on the processing activity, Q3 acts as either a Data Controller or a Data Processor. Where Q3 acts as a Data Processor, it shall process personal data only on documented instructions from the Data Controller and in accordance with contractual and statutory obligations.

c. The Responsible Person shall take responsibility for Q3 Services Group ongoing compliance with this policy.

d. Q3 shall ensure that staff handling personal data receive appropriate data protection training and awareness to support compliance with this policy and UK GDPR.

e. This policy shall be reviewed at least annually.

f. Q3 has registered with the Information Commissioner's Office as an organisation that processes personal data.

Lawful, fair and transparent processing

a. To ensure its processing of data is lawful, fair and transparent, Q3 shall maintain a Register of Systems.

b. The Register of Systems shall be reviewed at least annually.

c. Individuals have the right to access their personal data and any such requests made to Q3 shall be dealt with in a timely manner and in any event within one month of receipt, in accordance with UK GDPR.

Data subject rights

Q3 recognises the rights of individuals under UK GDPR, including the right of access, rectification, erasure, restriction of processing, data portability, the right to object, rights relating to automated decision-making, and the right to lodge a complaint with the Information Commissioner's Office.

Lawful purposes

a. All data processed by Q3 must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see ICO guidance for more information).

b. Where special category data or criminal offence data is processed, Q3 shall ensure that an appropriate condition under Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018 applies and that additional safeguards are implemented as required by law.

©Q3 Services Group 2018 |Classification: Q3 Internal

c. Q3 shall note the appropriate lawful basis in the Register of Systems.

d. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.

e. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in Q3's systems.

Data minimisation

a. Q3 shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Accuracy

a. Q3 shall take reasonable steps to ensure personal data is accurate.

b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

Data Protection Impact Assessments

Q3 shall carry out Data Protection Impact Assessments where processing is likely to result in a high risk to the rights and freedoms of individuals, in line with UK GDPR and ICO guidance.

Archiving / removal

a. To ensure that personal data is kept for no longer than necessary, Q3 shall put in place an archiving policy for each area in which personal data is processed and review this process annually.

b. The archiving policy shall consider what data should/must be retained, for how long, and why.

Security

a. Q3 shall ensure that personal data is stored securely using modern software that is kept-up-to-date.

b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.

c. When personal data is deleted this should be done safely such that the data is irrecoverable.

d. Appropriate back-up and disaster recovery solutions shall be in place.

International data transfers

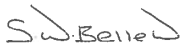
Where personal data is transferred outside the United Kingdom, Q3 shall ensure that appropriate safeguards are in place in accordance with UK GDPR, including adequacy regulations or approved contractual safeguards.

Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Q3 shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website).

©Q3 Services Group 2018 |Classification: Q3 Internal

All personal data breaches must be reported internally without delay to the Responsible Person to enable timely assessment and, where required, notification to the ICO within 72 hours.



Stuart Bellew
Chief Operating Officer
1st April 2026

©Q3 Services Group 2018 |Classification: Q3 Internal