

Privacy Policy

1. Introduction

1.1 Important information and who we are

Welcome to MSQ's Privacy and Data Protection Policy ("Privacy Policy").

At MSQ ("we", "us", or "our") we are committed to protecting and respecting your privacy and Personal Data in compliance with the United Kingdom General Data Protection Regulation ("GDPR"), the Data Protection Act 2018 and all other relevant and applicable laws and regulations of the United Kingdom.

This Privacy Policy explains how we collect, process and keep your data safe. The Privacy Policy will tell you about your privacy rights, how the law protects you, and informs our employees and staff members of all their obligations and protocols when processing data.

The individuals from which we may gather and use data in the context of this website are:

- Vendors/Suppliers;
- Clients;
- Website visitors; and

any other people that the organisation has a relationship with or may need to contact.

This Privacy Policy applies to personal data processed by us during your visit to this website.

1.2 Who is Your Data Controller

As your Data Controller, MSQ will determine the purposes for which and the manner in which any Personal Data is processed. Additionally, MSQ will be responsible for your personal data as well as compliance with data protection principles.

Address:

MSQ Holdings LTD
34 Bow Street,
London,
WC2E 7AU

Any inquiries about your data should be sent to the above email. It can also be sent directly to the company, if you prefer, in a letter to the listed address. We cannot guarantee prompt responses if physical mail is your chosen method of communication.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1.2 MSQ's Processing as a Controller, and Processors' responsibility to you – the visitor

While managing our responsibilities as a Data Controller, we have third party providers who will deal with your data on our behalf (known as "Processors"). The responsibilities described below may be assigned to a processor, or may be taken to apply to the organisation as a whole. The Data Controller and our Processors have the following responsibilities:

- Ensure that all processing of Personal Data is governed by one of the legal bases laid out in the GDPR (see section 2 below for more information on those bases);
- Ensure that Processors authorised to process Personal Data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;
- Implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk associated with the processing of Personal Data;
- Obtain the prior specific or general authorisation of the Controller before engaging another Processor;
- Assist the Controller in the fulfilment of the Controller's obligation to respond to requests for exercising the data subject's rights;
- Make available to the Controller all information necessary to demonstrate compliance with the obligations laid down in the GDPR and allow for and

contribute to audits, including inspections, conducted by the Controller or another auditor mandated by the Controller;

- Maintain a record of all categories of processing activities carried out on behalf of a Controller;
- Cooperate, on request, with the supervisory authority in the performance of its tasks;
- Ensure that any person acting under the authority of the Processor who has access to Personal Data does not process Personal Data except on instructions from the Controller; and Notify the Controller without undue delay after becoming aware of a Personal Data Breach;

2. Legal basis for data collection

2.1 Types of Data / Privacy Policy Scope

“Personal Data” means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect, use, store and transfer different kinds of Personal Data about you which we have grouped together below. Not all of the following types of data will necessarily be collected from you, but this is the full scope of data that we collect and when we collect it from you:

- Contact Data via email: This covers any data relating to your name and email that we may process as a result of you directly contacting us.
 - Legal basis: Legitimate interest.
- Marketing and Communications Data: This is your preferences in receiving marketing information and other information from us for our marketing newsletters. It will include your name & email address.
 - Legal basis: Consent.
- Job application data: containing information such as your name, location, email, cv data and cover letter, we use this to decide if you are a suitable candidate for the role you have applied for.
 - Legal basis: Contract, legal obligation for any adjustment data covered by the Equality Act 2010, sensitive data will be processed according to Article 9(2)(b).
- Technical Data: This is your IP address, browser type and version, time zone setting and location, operating system and platform, and other technology on the devices you use to engage with us. This is used for the purpose of analytics, with your consent, as well as to improve site functionality.
 - Legal basis: Legitimate interest, consent.
- Client business data: This is likely to be contact information, business email address and phone number.
 - Legal basis: Contract.

For further information on the legal bases and what they mean, please refer to section 2.2 below.

During the course of our normal business activities MSQ will not collect any special categories of Personal Data according to the UK GDPR.

MSQ will access and use your personal data only for the purposes for which you have submitted it to us to (a) provide information to you, (b) make contact with you, (c) provide services to you, or (d) maintain the operations and security of the website and services we provide to you. We will not use your personal information for any other purposes, for example for the communication of marketing materials, unless we have your specific consent that permits us to do so.

2.2 Legal Bases Explained

There are several justifiable reasons under the UK GDPR that allow the collection and processing of Personal Data. The main bases we rely upon are the following:

- “Consent”: Certain situations allow us to collect your Personal Data, such as when you tick a box that confirms you are happy to receive email newsletters from us, or ‘opt in’ to a service.
- “Contractual Obligations”: We may require certain information from you in order to fulfil our contractual obligations and provide you with the promised service.

- “Compliance with legal obligations”: Organisations occasionally have to process data in order to comply with legal regulations and legal & regulatory requirements.
- “Legitimate Interest”: We might need to collect certain information from you to be able to meet our legitimate interests – this covers aspects that can be reasonably expected as part of running our business, that will not have a material impact on your rights, freedom or interests. Examples could be your address, so that we know where to deliver something to, or your name, so that we have a record of who to contact moving forwards. When legitimate interest is relied upon, MSQ will conduct a Legitimate Interest Assessment (LIA) to validate the processing is not considered unfair or infringing on the data protection rights of any individuals we work with.

3. How we use your personal data

3.1 Sources of Data

We primarily obtain the data from you (including via the devices you use) while visiting the site. If we do not collect the personal data directly from you, we will also tell you the source of the personal data and, if applicable, whether it is sourced from publicly available sources.

3.2 Recipients, or Categories of Recipients, of the Personal Data

When processing your data, we work with service providers who have access to your data. The categories of recipients are as follows:

- software companies that enable us to provide our services, help us to improve them and/or serve us for marketing purposes (for example, to send newsletters, emails, manage customer contacts or applications);
- public bodies and administrations to the extent that we are legally obliged to do so;
- payment service providers;
- hosting providers;
- social media platforms; and
- service companies, such as tax advisors or lawyers.

For the purposes of fulfilling the contract, we may also disclose your personal data to anyone to whom we assign rights arising from the contractual relationship with you. In these instances, you will be directly informed.

3.3 Marketing and Content Updates

You will receive marketing and new content communications from us if you opt into receiving those communications. We may make suggestions and recommendations to you about goods or services that may be of interest to you, but only if we have a reasonable expectation that you would benefit from or be interested in these services in line with the PECR. The lawful basis for this

processing is legitimate interest, and a complementary legitimate interest assessment will be conducted when required.

3.4 Change of Purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. Your rights and how you are protected by us

4.1 What Rights Do I Have Over MSQ's Use Of My Personal Data?

As a data subject under the UK GDPR, you may have the right in law to:

- Information, in accordance with Art. 15 UK GDPR,
- Rectification, in accordance with Art. 16 UK GDPR,

- Data erasure ("right to be forgotten"), in accordance with Art. 17 UK GDPR,
- Limitation of processing, pursuant to Art. 18 UK GDPR,
- Data portability, according to Art. 20 UK GDPR and/or
- Objection to the processing, pursuant to Art. 21 UK GDPR.

To exercise these rights, you can send an email to us at any point at the following email address:
privacy@msqpartners.com.

We will handle any request to exercise these rights in accordance with the relevant laws, but please note that these rights may not be absolute. MSQ may refuse or deny a request in accordance with these rules, though where possible you will be informed why this is happening.

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, if your request is clearly unfounded, we could refuse to comply with your request.

We may also need to request specific information from you to help us confirm your identity and ensure you have the right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response

4.2 Information On The Right To Object Pursuant To Article 21 (4) UK GDPR

You have the right to object at any time, to the processing of personal data concerning you which is carried out on the basis of Article 6(1)(e) or (f) of the UK GDPR; this also applies to profiling based on these provisions. We will no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the assertion, exercise, or defence of legal claims.

If your personal data is processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing; this also applies to profiling that is related to direct marketing.

4.3 How Does MSQ Protect Customers' Personal Data?

We are concerned with keeping your data secure and protecting it from inappropriate disclosure. Any Personal Data collected by us is only accessible by a limited number of employees who have special access rights to such systems and are bound by obligations of confidentiality. When we use subcontractors to store your data, we will not relinquish control of your Personal Data or expose it to security risks that would not have arisen had the data remained in our possession.

However, unfortunately no transmission of data over the internet is guaranteed to be completely secure. It may be possible for third parties not under the control of MSQ to intercept or access transmissions or private communications unlawfully. While we strive to protect your Personal Data, we cannot ensure or warrant the security of any Personal Data you transmit to us. Any such transmission is done at your own risk. If you believe that your interaction with us is no longer secure, please contact us at privacy@msqpartners.com.

4.4 Opting Out Of Marketing Promotions

You can ask us to stop sending you marketing messages at any time by unsubscribing.

Where you opt out of receiving these marketing messages, we will continue to retain other Personal Data provided to us as a result of interactions with us not related to your marketing preferences.

5. Your data and third parties

5.1 Will We Share Your Data With Third Parties?

We share non-Personal Data with third parties. We may share your Personal Data with subcontractors when necessary and with your consent. The sub-contractors are also subject to our confidentiality obligations to use it only for the purposes for which we disclose it to them and pursuant to our instructions.

We may also share Personal Data with interested parties in the event that MSQ anticipates a change in control or the acquisition of all or part of our business or assets or with interested parties in connection with the licensing of our technology.

If MSQ is sold or makes a sale or transfer, we may, in our sole discretion, transfer, sell or assign your Personal Data to a third party as part of or in connection with that transaction. Prior to such transfer, you will be provided with the appropriate Article 13/14 notice, and if consent is the lawful basis for processing your data we will contact you to renew this consent. In all other situations your data will still remain protected in accordance with this Privacy Policy.

We may share your Personal Data at any time if required for legal reasons or in order to enforce our terms or this Privacy Policy.

5.2 Is my data shared with anyone else?

MSQ Partners Limited may occasionally share data with other agencies within the group of undertakings in order to provide you a contracted service. This data sharing is conducted in accordance with the UK GDPR Art. 4 (19), Recital 37 + 48, allowing for a legitimate interest in sharing certain personal data within the group. This data sharing is limited to what is necessary, and primarily applies to your application to a job position. Your data will not be shared with other agencies within the group or with no purpose. If your data is to be shared, you will be provided with notice.

5.3 Third-Party Links

This Site may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Site, we encourage you to read the privacy policy of every website you visit.

6. Applying for a job at MSQ

When applying for a job at MSQ, you will be redirected to our Application Tracking System, and we have a privacy policy created specifically for that page which will answer any questions you may have related to your application.

7. How long will we keep your data?

We store your personal data only as long as it is necessary to achieve the purpose of processing. In most normal cases, we store your data if you have consented to the processing until you revoke your consent. If we need the data to perform a contract, we retain the data for as long as the contractual relationship with you exists. If we use the data on the basis of a legitimate interest, we will retain your data for as long as your interest in deletion or anonymization does not prevail. MSQ maintains a retention policy and schedule to ensure that data is not kept longer than is necessary.

In addition, data may be stored beyond the outlined periods in certain rare circumstances where data must be kept in order to exercise legal rights or to comply with other legal obligations. In these cases, the data is deleted when a storage or retention period prescribed by law expires.

We store applicant documents for a period of six months if the application does not lead to an employment relationship and no further storage has been agreed.

8. Cookies

See below 'Cookie policy'.

9. International data transfers

There is a transfer of data to third countries outside of the United Kingdom and European Union. Information we collect from you could be processed in the United States or other third countries. Some third countries, such as the United States, have not currently received an adequacy decision from the European Union or UK under Article 45 of the GDPR which means that your data may not receive the same level of protection there as it does under the UK GDPR and European GDPR.

International data transfers are made based on contractual and other guaranteed safeguards provided for by law, which are intended to ensure adequate protection of your data and which you can view on request. We rely on the rules set out in Article 49 of the GDPR or, where applicable, on safeguards pursuant to Article 46 of the GDPR. We, and

our processors, strive to apply appropriate measures to protect the privacy and security of your personal data. For this reason, we only process your personal data in accordance with the practices described in our Privacy Policy.

10. Notification of changes and acceptance of policy

We keep our Privacy Policy under review and will place any updates on this webpage. If we are obliged to inform you of drastic changes, you will receive an email detailing these changes. For contact information, please refer to section 1.1 of this policy.

Cookie Policy

Introduction

Welcome to MSQ Partners's Cookie Policy.

This Cookie Policy explains how MSQ Partners ("Company", "we", "us", and "our") uses cookies and similar technologies to recognize you when you visit our website at msqpartners.com ("Website"). It explains what these technologies are and why we use them, as well as your rights to control our use of them.

In some cases, we may use cookies to collect personal information, or that becomes personal information if we combine it with other information.

What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners to make their websites work, or to work more efficiently, as well as to provide reporting information.

Cookies set by the website owner (in this case, MSQ Partners) are called "first-party cookies". Cookies set by parties other than the website owner are called "third-party cookies". Third party cookies enable third party features or functionality to be provided on or through the website (e.g., like advertising, interactive content, and analytics). The parties that set these third-party cookies can recognize your computer both when it visits the website in question and also when it visits certain other websites.

Why do we use cookies?

We use first- and third-party cookies for several reasons. Some cookies are required for technical reasons in order for our Website to operate, and we refer to these as "Necessary" or "strictly necessary" cookies. Other cookies also enable us to track and target the interests of our users to enhance the experience on our Websites. Third parties serve cookies through our Website for advertising, analytics and other purposes. This is described in more detail below.

The specific types of first- and third-party cookies served through our Websites and the purposes they perform are described below (please note that the specific cookies served may vary depending on the specific Website you visit) in section 5

How do I control the function of cookies while browsing the MSQ Partners site?

You have the right to decide whether to accept or reject cookies. You can exercise your cookie rights by setting your preferences in the Cookie Consent Manager. The Cookie Consent Manager allows you to select which categories of cookies you accept or reject. Necessary cookies cannot be rejected as they are strictly necessary to provide you with services.

The Cookie Consent Manager can be found in the notification banner and on our website. If you choose to reject cookies, you may still use our website though your access to some functionality and areas of our website may be restricted. You may also set or amend your web browser controls to accept or refuse cookies. As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, you should visit your browser's help menu for more information.

In addition, most advertising networks offer you a way to opt out of targeted advertising. If you would like to find out more information, please visit www.aboutads.info/choices/ or www.youronlinechoices.com.

The specific types of first and third party cookies served through our Websites and the purposes they perform are described in the table below in Section 5.

Website cookie list

Functional/Strictly Necessary

Cookie	Provider	Expiry	Function	Location
_cf_bm	Hubspot.com	30 Minutes	This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website.	U.S.
__cf_bm	Hubspot.com (Forms)	30 Minutes	This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website.	U.S.
__cfuid	Connect.msqpartners.com	Session	Cookie associated with sites using CloudFlare, used to identify trusted web traffic.	UK
AI_sentBuffer / AI_Buffer	CognitoForms	Session	Used in conjunction to limit number of server data updates (Azure). This allows the website to detect any duplicate server data updates.	

Analytics/Statistics

Cookie	Provider	Expiry	Function	Location
vuid	Vimeo.com	2 Years	Vimeo installs this cookie to collect tracking information by setting a unique ID to embed videos to the website.	U.S.
_ga	MSQ Partnerspartners.com (via Google Analytics)	2 Years	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	U.S.
_gat	MSQ Partnerspartners.com (via Google Analytics)	1 Day	Used by Google Analytics to throttle request rate.	U.S.
_gid	MSQ Partnerspartners.com (via Google Analytics)	1 Day	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	U.S.

What about other tracking technologies, like web beacons?

Cookies are not the only way to recognize or track visitors to a website. We may use other, similar technologies from time to time, like web beacons (sometimes called "tracking pixels" or "clear gifs"). These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Website or opened an e-mail including them.

This allows us, for example, to monitor the traffic patterns of users from one page within a website to another, to deliver or communicate with cookies, to understand whether you have come to the website from an online advertisement displayed on a third-party website, to improve site performance, and to measure the success of e-mail marketing campaigns. In many instances, these technologies are reliant on cookies to function properly, and so declining cookies will impair their functioning.

International transfers

As can be seen in Section 5, certain cookies involve transfers of data to 3rd countries (i.e., the United States).

By consenting to the third-country cookies, you are agreeing that your data may be transferred to third countries where the same level of data protection as in the EU cannot be guaranteed. There is a risk that non-European authorities and third parties may gain access to this data. We have no knowledge of which authorities and third parties could access your data and how long, where and for what purpose this data could be used. You can revoke your consent at any time. For more information, please see our privacy policy.

How often will this policy be updated?

We will update this Cookie Policy from time to time in order to reflect, for example, changes to the cookies we use or for other operational, legal or regulatory reasons. Please therefore re-visit this Cookie Policy regularly to stay informed about our use of cookies and related technologies.

If you have any questions about our use of cookies or other technologies, please email us at: hello@msqpartners.com

November 2024

Equality, Diversity and Inclusion Policy

Our organisation is made up of brilliant people. Each of us is unique, whether in terms of our

background, personal characteristics, experience, skills or motivations. And we value our people for

the differences they bring to the table. These differences - this diversity - is powerful.

Fostering an inclusive culture helps each of us to benefit from a wider range of these different

perspectives, experiences and skills. We believe that this creates a happier, more productive working

environment for us all.

To support this inclusive culture, this policy:

- outlines our commitment throughout the employment lifecycle to equality, diversity and

inclusion and sets out how we put this commitment into practice;

- explains the behaviours we expect of our people in support of this commitment; and

- sets out the key steps we take to make our culture as inclusive as possible, including our

diversity and inclusion framework and how we ensure equality of opportunity throughout the

employment lifecycle.

This policy does not form part of your contract of employment and we reserve the right to amend or

withdraw it at any time.

Who is covered by this policy

This policy applies to anyone working for us. This includes employees, workers, contractors,

volunteers, interns and apprentices. The policy also relates to job applicants, and is relevant to all

stages of the employment relationship.

Responsibility for the policy lies with Holly Misra, HR Manager, who will review the policy on an annual basis.

Our commitment to you

We believe that a culture of equality, diversity and inclusion not only benefits our organisation but

supports wellbeing and enables our people to work better because they can be themselves and feel

that they belong.

We are committed to promoting a working environment based on dignity, trust and respect, and one

that is free from discrimination, harassment, bullying or victimisation.

We ensure that our recruitment, promotion and retention procedures do not treat people less

favourably because of their:

- disability;
- gender, gender identity or gender reassignment status;
- marital status;
- race, racial group, ethnic or national origin, or nationality;
- religion or belief;
- sexual orientation;
- age;
- civil partnership status;
- pregnancy or maternity;
- paternity;
- educational background;
- socio-economic background;
- caring responsibilities;
- part-time status; or

- fixed-term status.

What we expect from you

We expect you, and every one of our people, to take personal responsibility for observing, upholding,

promoting and applying this policy. Our culture is made in the day-to-day working interactions

between us so creating the right environment is a responsibility that we all share.

Cultivating this culture does not happen by accident but requires ongoing commitment and nurturing.

The reality is that we live in a world where areas of difference (whether gender, sexual orientation,

ethnicity or others) often translate to biases, challenges and barriers that may not be faced by others.

And the more areas of difference a person brings, the more this effect can be compounded.

We expect you to treat your colleagues and third parties (including customers, suppliers, contractors,

agency staff and consultants) fairly and with dignity, trust and respect. Sometimes, this may mean

allowing for different views and viewpoints and making space for others to contribute.

By embedding such values and constructively challenging inappropriate comments or ways of

working, you can help us achieve and maintain a truly inclusive workplace culture.

Any dealings that you have with colleagues or third parties must be free from any form of discrimination, harassment, victimisation or bullying.

If any of our people is found to have committed, authorised or condoned an act of discrimination,

harassment, victimisation or bullying, we will take action against them including (for those to whom it

applies) under our Disciplinary procedure.

You should be aware that you can be personally liable for discrimination and harassment.

Discrimination

The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These are:

- disability;
- sex;
- gender reassignment;
- marital or civil partnership status;
- race;
- religion or belief;
- sexual orientation;
- age; and
- pregnancy or maternity.

Discrimination can be intentional or unintentional and may occur directly, indirectly, by association, or

by perception.

Discrimination is not always obvious and can be subtle and unconscious. This stems from a person's

general assumptions about the abilities, interests and characteristics of a particular group that

influences how they treat those people (known as "unconscious bias"). Such assumptions or

prejudices may cause them to apply requirements or conditions that put those in particular groups at a

disadvantage.

Our equality, diversity and inclusion framework

Equality of opportunity - recruitment

We take reasonable and appropriate steps to encourage job applications from as diverse a range of

people as possible.

Every decision-maker should challenge themselves, and other members of the recruitment selection

panel, to make sure that any stereotypes, unconscious bias or prejudice do not play any part in

recruitment decisions.

Equality of opportunity - career development

Any decision you make relating to a person's promotion or career development must be free from

discrimination.

We have a centralised salary review process and ensure that selection criteria and processes for

recruitment and promotion are reviewed on a regular basis so that there is no discriminatory impact

on a certain group.

We continue to improve the diversity of our workforce, for example by:

- offering work experience placements and career workshops to students from lower socio

economic backgrounds each summer;

- running an open day each November for students from a deprived area of London;

- running return to work sessions for those returning from maternity leave or long term sick;

- having a standardised appraisal process across all teams and levels to ensure equal access

to career development conversations;

- ensuring we have a representative in all divisions of the MSQ DEI council