

# PRIVACY POLICY

Quotanda Loans, S.L. — European Union and United Kingdom

June 2026 · Student Portal

Quotanda is committed to the privacy and security of your personal data. This Privacy Policy describes how we process your personal information in accordance with Regulation (EU) 2016/679 (GDPR), Organic Law 3/2018 on the Protection of Personal Data (LOPDGDD), Regulation (EU) 2024/1689 on Artificial Intelligence (AI Act), the UK GDPR, the Data Protection Act 2018, and all other applicable legislation in each country where we operate.

This policy applies to data processing carried out through our student portal, including application, evaluation, contract signing, and administration of education financing (Deferred Tuition, Payment Plans and Income Share Agreements).

## 1. Basic Data Protection Information

<b>Data Controller</b>	Quotanda Loans, S.L. · CIF: B-65979890 · Calle d'Aribau, 168, 1-1, Eixample, 08036 Barcelona, Spain
<b>Privacy Contact</b>	support@quotanda.com
<b>Main Purposes</b>	• Management of education financing applications • Identity verification and AML/KYC compliance • Execution and administration of the financing contract • Compliance with legal obligations • Fraud prevention
<b>Legal Basis</b>	Performance of contract · Legal obligation · Legitimate interest · Consent (depending on purpose)
<b>Recipients</b>	Partner educational institutions · Technology subprocessors · Competent authorities · EIF/EIB (InvestEU programmes)
<b>International Transfers</b>	To countries outside the EEA with adequate safeguards (SCCs approved by the European Commission or adequacy decision)
<b>Your Rights</b>	Access · Rectification · Erasure · Objection · Restriction · Portability · Not to be subject to automated decisions
<b>Lead Supervisory Authority</b>	Spanish Data Protection Agency (AEPD) · See full table in Section 12
<b>Applicable Law</b>	GDPR (EU) 2016/679 · LOPDGDD (Spain) · AI Act (EU) 2024/1689 · UK GDPR + DPA 2018 (United Kingdom)

## 2. Who Is the Data Controller?

<b>Entity</b>	Quotanda Loans, S.L.
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<b>CIF</b>	B-65979890
<b>Registered Address</b>	Calle d'Aribau, 168, 1-1, Eixample, 08036 Barcelona, Spain
<b>Companies Registry</b>	Registered at the Barcelona Companies Registry
<b>Contact</b>	support@quotanda.com
<b>Website</b>	www.quotanda.com

Important notice for UK residents: if you are resident in the United Kingdom, the data controller is not Quotanda Loans, S.L. but Quotanda (UK) Ltd, registered at 11 The Terrace, London, England, SW13 0NP. Please refer to Section 13 for information specific to UK users.

## 2.1 Quotanda as Controller and as Processor (Art. 28 GDPR)

Quotanda operates in a dual capacity depending on the type of processing involved:

- As independent Data Controller: when processing data for its own purposes, such as fraud prevention, AML/KYC checks carried out in compliance with its own legal obligations, payment behaviour analysis, or service improvement.
- As Data Processor under Article 28 GDPR: when processing students' personal data on behalf of and under the instructions of the partner educational institution. In this case, the educational institution acts as Data Controller, determines the purposes and means of processing, and is the entity legally responsible to the student. Quotanda acts solely as the technical and operational executor of those instructions. This relationship is formalised through a Data Processing Agreement (DPA) with each institution, in accordance with Article 28 GDPR.

If you wish to exercise your data protection rights in relation to data shared with Quotanda by your educational institution, you may contact both your institution and Quotanda directly at support@quotanda.com.

## 3. What Personal Data Do We Process and Where Does It Come From?

### 3.1 Categories of Data Processed

Depending on the product and programme, Quotanda may process the following categories of personal data:

#### a) Identification and Contact Data

- Full name, date of birth, nationality
- Identity document number (national ID, passport or equivalent)
- Postal address evidenced by a utility bill or official document
- Email address and mobile phone number
- Photograph of identity document and selfie for verification

#### b) Financial and Economic Data

- Bank statements and account movements
- Bank account number (IBAN) for payment management

- Payslips and proof of income
- Information on outstanding debts, financial obligations, and solvency
- Payment history and financing contract management

### **c) Employment and Professional Status — particularly in ISA programmes**

- Current employment status: employed, unemployed, self-employed
- Employer name and job title
- Income level and monthly or annual salary
- Professional sector and work experience
- Periodic updates on employment status during the ISA contract term, required for income-based instalment calculations

### **d) Academic Data**

- Educational institution where enrolled
- Programme and level of study
- Enrolment status and programme start/end dates

### **e) AML/KYC Verification and Sanctions List Data**

- Full name for verification against international sanctions lists (EU, UN, US, UK)
- Check against the European Commission's EDES system
- Politically Exposed Person (PEP) check
- Results of periodic checks during the contract term

### **f) Biometric Data — InvestEU programmes only**

In financing programmes backed by the European Investment Fund (EIF), Quotanda carries out an enhanced identity verification process that includes biometric data processing, on the legal basis of legal obligation arising from the EIF guarantee agreement. See Section 8 for details.

- Identity document image
- Facial biometric verification (selfie compared against document image)
- Physical presence verification (liveness detection)

### **g) Technical and Portal Usage Data**

- IP address and device details
- Browser, operating system and time zone
- Pages visited and portal interactions
- Authentication and access logs

## **3.2 Sources of Data**

- Directly from you: through the application form, documents you provide, and information submitted during the verification process.

- From your educational institution: enrolment, programme, and academic status data shared with Quotanda under its collaboration agreement.
- From publicly accessible sources: Quotanda may search publicly available information online and on professional social networks such as LinkedIn, solely to verify and supplement information in the application. Only information publicly accessible to any person is collected. Quotanda does not connect to external credit scoring or Social Security APIs in Europe.
- From third-party verification providers: results of checks carried out by Quotanda's identity verification and sanctions list providers (Jumio, ComplyAdvantage) are incorporated into the applicant's file.

## 4. Purposes and Legal Basis

The table below sets out all purposes for which Quotanda processes your personal data and the legal basis under Article 6 GDPR:

Purpose	Legal Basis (Art. 6 GDPR)
Management of education financing application: receiving, evaluating and resolving your application for Deferred Tuition, Payment Plan or ISA.	Performance of a contract or pre-contractual steps (Art. 6.1.b)
Identity and document verification: confirming the authenticity of documents submitted.	Performance of contract + AML legal obligation (Art. 6.1.b and 6.1.c)
Sanctions and exclusion list checks (AML/KYC): verification against EU, UN, US and UK sanctions lists and the European Commission's EDES system.	Legal obligation from AML legislation and EIF guarantee agreement (Art. 6.1.c)
Credit risk assessment: analysis of financing viability based on financial and economic documentation provided by the student.	Performance of contract (Art. 6.1.b)
Contract execution and administration: instalment management, collections, contractual communications, payment plan changes.	Performance of contract (Art. 6.1.b)
Periodic employment monitoring in ISA contracts: periodic collection of employment status and income data for income-based instalment calculation.	Performance of contract (Art. 6.1.b) + ISA contractual obligation
Default and collections management: contact and follow-up in cases of payment delays or breach.	Legitimate interest (Art. 6.1.f) + performance of contract
EIF guarantee management: communication of data to the European Investment Fund and European Investment Bank under the InvestEU guarantee programme.	Legal obligation + execution of InvestEU guarantee agreement (Art. 6.1.b and 6.1.c)
Periodic AML checks during the contract term: re-verification against sanctions lists every six months, as required by the EIF agreement.	Legal obligation + EIF agreement (Art. 6.1.c)
Fraud prevention and system integrity: detection and prevention of fraudulent use of the portal and financing programmes.	Legitimate interest of Quotanda (Art. 6.1.f)

Audits and inspections: document retention and cooperation with EIF, EIB, OLAF, European Court of Auditors and other competent authorities.	Legal obligation (Art. 6.1.c)
Service communications: notifications on application status, instalment due dates and relevant contract changes. These communications are essential to the service.	Performance of contract (Art. 6.1.b)
Marketing communications about new Quotanda products or services.	Consent (Art. 6.1.a). You may withdraw consent at any time without affecting the lawfulness of prior processing.
Service improvement and new feature development: statistical and usage analysis of the portal, using anonymised or pseudonymised data where possible.	Legitimate interest of Quotanda (Art. 6.1.f)

## 4.1 Automated Decisions, AI, and AI Act Compliance

Quotanda does not make financing approval or rejection decisions in a fully automated manner. All decisions are made by at least two qualified team members (four-eyes review), ensuring effective human oversight at all times.

AI tools, including Anthropic's Claude platform, are used in an advisory capacity in certain internal operational processes. An AI tool's assessment never determines the outcome of an application on its own; the final decision always rests with qualified individuals who may question, modify or reject any automated assessment.

In relation to Regulation (EU) 2024/1689 on Artificial Intelligence (AI Act), Quotanda complies with the following obligations:

- AI systems used in processes affecting students are identified, classified by risk level, and documented in accordance with the AI Act.
- Effective human oversight is ensured in all processes where AI is involved, particularly in financing decisions.
- Quotanda staff working with AI tools receive appropriate training in AI literacy, in accordance with Article 4 of the AI Act.
- In Spain, the competent authority for AI Act supervision is the Spanish Agency for the Supervision of Artificial Intelligence (AESIA).

Accordingly, the rights under Article 22 GDPR regarding solely automated decisions do not directly apply. Nevertheless, you have the right to request human review of any decision affecting you, to express your point of view, and to contest the outcome by contacting us at [support@quotanda.com](mailto:support@quotanda.com).

## 5. With Whom Do We Share Your Data?

### 5.1 Categories of Recipients

- Your educational institution: the school or university with which you have your financing programme receives transactional information on the status of your contract. Full bank details are not disclosed.
- Technology subprocessors: companies providing technology services that may access personal data in the course of their services. The full list with formalised DPAs is set out in Section 5.2.

- European Investment Fund (EIF) and European Investment Bank (EIB): in InvestEU-backed programmes, the EIF and EIB act as independent data controllers for their own supervision and audit purposes. See Section 8.
- Competent authorities: regulatory bodies, tax authorities, law enforcement or judicial authorities when legally required or necessary to prevent or detect unlawful activity.
- Collections agencies: in cases of non-payment, and only to the extent necessary for debt recovery, we may transfer contact and debt information to authorised collections agencies under confidentiality and DPA arrangements.
- Acquirers in a business transfer: if Quotanda were subject to an acquisition, merger, or asset transfer, data may be transferred to the acquirer for service continuity, with prior notice to data subjects.

## 5.2 List of Subprocessors

Quotanda has entered into Data Processing Agreements (DPAs) with all subprocessors that process personal data on its behalf, in accordance with Article 28 GDPR. For transfers outside the European Economic Area (EEA), Standard Contractual Clauses (SCCs) approved by the European Commission under Implementing Decision (EU) 2021/914 apply, or adequacy decisions where available.

Provider	Service	Location	Transfer Mechanism	Privacy Policy
<b>Salesforce, Inc.</b>	CRM and financial contract management	EU (France)	No transfer outside EEA	<a href="#">Privacy Policy</a>
<b>Google Cloud EMEA / Workspace</b>	Storage, email and collaboration	EU (Ireland)	No transfer outside EEA	<a href="#">Privacy Policy</a>
<b>Stripe Payments Europe Ltd.</b>	Online payment processing	EU (Ireland)	No transfer outside EEA	<a href="#">Privacy Policy</a>
<b>DocuSign International (EMEA) Ltd.</b>	Digital contract signing	EU (Ireland)	No transfer outside EEA	<a href="#">Privacy Policy</a>
<b>Microsoft Ireland Operations Ltd.</b>	Video conferencing and Microsoft 365	EU (Ireland)	No transfer outside EEA	<a href="#">Privacy Policy</a>
<b>Slack Technologies Limited</b>	Internal corporate messaging	EU (Ireland)	No transfer outside EEA	<a href="#">Privacy Policy</a>
<b>GoCardless SAS</b>	SEPA direct debit	EU (France)	No transfer outside EEA	<a href="#">Privacy Policy</a>
<b>SA Digiteal</b>	SEPA payments and direct debit	EU (Belgium/Germany)	No transfer outside EEA	<a href="#">Privacy Policy</a>
<b>Amazon Web Services EMEA</b>	Server infrastructure	EU (Spain/Europe)	No transfer outside EEA	<a href="#">Privacy Policy</a>
<b>OpenSanctions Datenbanken GmbH</b>	AML/PEP verification (backup)	EU (Germany)	No transfer outside EEA	<a href="#">Privacy Policy</a>
<b>Happyday Events, S.L. (Paymefy)</b>	Collections and debt management	EU (Spain)	No transfer outside EEA	<a href="#">Privacy Policy</a>

<b>Ferrer Gestió Professional, S.L.U.</b>	Tax and payroll services	EU (Spain)	No transfer outside EEA	<a href="#">Privacy Policy</a>
<b>Magentrix Corporation</b>	Student portal and authentication	Canada	EU Adequacy Decision (PIPEDA)	<a href="#">Privacy Policy</a>
<b>Nintex UK Ltd.</b>	Automated document processing	United Kingdom	EU Standard Contractual Clauses	<a href="#">Privacy Policy</a>
<b>IVXS UK Ltd. (ComplyAdvantage)</b>	AML verification and sanctions lists	United Kingdom	EU Standard Contractual Clauses	<a href="#">Privacy Policy</a>
<b>Jumio Corporation</b>	Biometric KYC identity verification (InvestEU)	USA	EU Standard Contractual Clauses	<a href="#">Privacy Policy</a>
<b>Twilio, Inc.</b>	SMS communications with students	USA	EU Standard Contractual Clauses	<a href="#">Privacy Policy</a>
<b>Freshworks Inc.</b>	Student support and communications	USA	EU Standard Contractual Clauses	<a href="#">Privacy Policy</a>
<b>Calendly LLC</b>	Interview scheduling with students	USA	EU Standard Contractual Clauses	<a href="#">Privacy Policy</a>
<b>Anthropic, PBC (Claude)</b>	AI tool for internal operational support	USA	EU Standard Contractual Clauses	<a href="#">Privacy Policy</a>

## 6. International Data Transfers

Some of Quotanda's subprocessors are located outside the European Economic Area (EEA) or the United Kingdom. In all such cases, Quotanda ensures that transfers are made with the appropriate safeguards required by the GDPR (Chapter V):

- Standard Contractual Clauses (SCCs): for transfers to providers in the US and UK, Quotanda uses the SCCs approved by the European Commission under Implementing Decision (EU) 2021/914 of 4 June 2021. All contracts with non-EEA subprocessors incorporate these clauses.
- Adequacy Decision: Canada has been recognised by the European Commission as providing an adequate level of protection (PIPEDA), so no additional transfer mechanism is required.

Biometric data processed by Jumio in the US under InvestEU programmes is transferred under specific SCCs that include enhanced technical and organisational measures, given the particularly sensitive nature of this data.

## 7. Quotanda as Data Processor (Art. 28 GDPR)

When Quotanda processes personal data of students on behalf of a partner educational institution, it acts as Data Processor within the meaning of Article 28 GDPR. This relationship entails the following:

- The educational institution is the Data Controller: it determines the purposes and means of processing its students' data and is legally responsible to them.

- Quotanda acts solely under documented instructions from the institution: data is not processed for purposes other than those instructed by the educational institution, except where Quotanda acts as independent controller as described in Section 4.
- The relationship is formalised through a DPA: each partner educational institution has entered into a Data Processing Agreement with Quotanda, governing confidentiality, security, subprocessor management, assistance with rights requests, and breach notification, in accordance with Article 28 GDPR.
- Assistance with rights requests: to exercise access, rectification, erasure, objection, restriction or portability rights in relation to data shared by your institution with Quotanda, you may contact either your institution or Quotanda directly at [support@quotanda.com](mailto:support@quotanda.com).

## 8. InvestEU Programmes — European Investment Fund

Some financing programmes managed by Quotanda benefit from European Union support under the InvestEU Fund, through a guarantee provided by the European Investment Fund (EIF) and the European Investment Bank (EIB).

### 8.1 Data Processing by the EIF and EIB

Under these programmes, the EIF and EIB act as independent data controllers for their own supervision, audit and programme monitoring purposes. They may therefore access certain data about you independently of Quotanda.

You have the right to consult the EIF and EIB data protection statements:

- EIF Data Protection Statement for Final Beneficiaries: available at [www.eif.org](http://www.eif.org)
- EIF Data Monitoring Statement: available at [www.eif.org](http://www.eif.org)
- EIB Privacy Statement: available at [www.eib.org/privacy](http://www.eib.org/privacy)

### 8.2 Enhanced Identity Verification (Biometric KYC)

For EIF-backed InvestEU programmes, Quotanda carries out an enhanced identity verification process that includes biometric data processing. This verification is mandatory to access the programme and no equivalent alternative exists.

The verification is carried out through Jumio Corporation and includes:

- Identity document verification (national ID, NIE, passport or equivalent): authenticity check.
- Facial biometric verification: a real-time selfie is captured and compared against the identity document image using facial recognition technology.
- Physical presence detection (liveness detection): to confirm the applicant is physically present during the process and prevent impersonation fraud.

### Legal Basis for Biometric Data Processing

- Art. 6.1.f GDPR — Legitimate interest: biometric identity verification is necessary to ensure the integrity of the education financing process and to prevent identity fraud, protecting both the student and programme funds.
- Art. 9.2.g GDPR — Substantial public interest: as the programme is backed by the European Investment Fund using EU public funds under InvestEU, there is a substantial public interest in robustly verifying that recipients are who they claim to be, ensuring proper use of public funds and preventing fraud in EU-funded programmes.

### Processing by Jumio and International Transfer

Biometric data is processed by Jumio Corporation, headquartered in the USA. The transfer of biometric data to the US is carried out under SCCs approved by the European Commission under Implementing Decision (EU) 2021/914, with enhanced technical and organisational measures given the particularly sensitive nature of biometric data.

Jumio retains biometric data for a maximum of 3 years from the date of verification, after which it is securely and irreversibly deleted. Data is processed solely for the identity verification purpose described above and is not used for any other purpose.

**Prior Notice Before the KYC Process**

Before beginning the biometric verification process on the portal, the student receives a specific and fully informed notice detailing what data will be collected, who processes it, the retention period, and the applicable safeguards for the international transfer. This notice is separate from this Privacy Policy and forms part of the portal verification process.

In addition, periodic six-monthly checks against international sanctions lists are carried out throughout the contract term to comply with the ongoing eligibility requirements of the InvestEU guarantee agreement. These checks are conducted by querying name and surname against the relevant lists, without processing biometric data.

**8.3 Audits and Inspections**

Under the InvestEU guarantee agreement, certain European authorities have the right to access documentation related to your contract for audit and oversight purposes. These authorities include the European Court of Auditors (ECA), the European Anti-Fraud Office (OLAF), the EIF, the EIB, the European Commission, and the European Public Prosecutor’s Office (EPPO).

**9. Data Retention**

Category	Retention Period
<b>Selected applicant (active contract)</b>	Duration of the contract + 36 months after the closing date. For InvestEU contracts: up to 5 years after the termination of the EIF guarantee agreement (approximately 12 years from the end of the inclusion period), or until any ongoing audit or investigation is closed.
<b>Rejected applicant</b>	5 years from the date of rejection, in compliance with AML and fraud prevention requirements.
<b>Applicant who abandoned the process</b>	5 years from the date the application lapsed due to inactivity (90 days).
<b>User who requests erasure</b>	5 years from the date of exercise of the right, with data anonymised. Certain data may be retained longer if a legal obligation requires it.
<b>AML and sanctions data</b>	10 years from contract closure, in compliance with anti-money laundering legislation.

Upon expiry of the applicable retention periods, data is securely and irreversibly deleted through automated processes, or anonymised so that it can no longer identify the data subject. Data will not be deleted while an audit, investigation or legal proceeding is ongoing.

## 10. Your Data Protection Rights

Right	What it allows
<b>Access (Art. 15 GDPR)</b>	You have the right to obtain confirmation of whether your data is being processed and, if so, to access it and receive a copy.
<b>Rectification (Art. 16 GDPR)</b>	You may request the correction of inaccurate or incomplete data.
<b>Erasure (Art. 17 GDPR)</b>	You may request the deletion of your data when it is no longer necessary for the purposes for which it was collected, unless a legal retention obligation applies.
<b>Objection (Art. 21 GDPR)</b>	You may object to processing based on legitimate interest or for direct marketing purposes.
<b>Restriction (Art. 18 GDPR)</b>	You may request restriction of processing in certain circumstances, for example while the accuracy of data is being verified.
<b>Portability (Art. 20 GDPR)</b>	You have the right to receive your data in a structured, commonly used and machine-readable format and to transmit it to another controller, where processing is based on consent or a contract.
<b>Not subject to automated decisions (Art. 22 GDPR)</b>	You have the right to request human review of any decision affecting you, to express your point of view and to contest it. As stated in Section 4.1, Quotanda does not make solely automated decisions.
<b>Withdraw consent</b>	Where processing is based on your consent, you may withdraw it at any time without affecting the lawfulness of processing carried out prior to withdrawal.

### 10.1 How to Exercise Your Rights

**Send your request by email to: [support@quotanda.com](mailto:support@quotanda.com)**

Include: full name, identity document number, the right you wish to exercise, and any additional information that may help us locate your data.

Response time: we will respond within 30 days of receipt, extendable to 60 days in complex cases, with prior notification.

## 11. Data Security

Quotanda applies appropriate technical and organisational measures to ensure a level of security adequate to the risk, including:

- SSL/TLS encryption for all communications between the user's browser and Quotanda's servers.
- Encryption of data at rest and in transit using current security standards.
- Access controls limiting personal data access to strictly authorised personnel.
- Change audit logs to maintain data traceability.
- Storage on secure platforms with recognised security certifications (ISO 27001, SOC 2, PCI DSS).

- Documented incident and data breach management procedure.
- Confidentiality agreements and formalised DPAs with all subprocessors.

In the event of a data breach that may pose a high risk to your rights and freedoms, Quotanda will notify you without undue delay, in accordance with Article 34 GDPR.

## 12. Competent Supervisory Authority

You have the right to lodge a complaint with the data protection supervisory authority in your country of residence. Quotanda's lead supervisory authority in the European Union is the Spanish Data Protection Agency (AEPD), as the responsible entity — Quotanda Loans, S.L. — is established in Spain.

Country	Supervisory Authority	Website
Spain	Agencia Española de Protección de Datos (AEPD)	www.aepd.es
Italy	Garante per la Protezione dei Dati Personali	www.garanteprivacy.it
France	Commission Nationale de l'Informatique et des Libertés (CNIL)	www.cnil.fr
Portugal	Comissão Nacional de Proteção de Dados (CNPd)	www.cnpd.pt
Germany	Bundesbeauftragter für den Datenschutz (BfDI)	www.bfdi.bund.de
Netherlands	Autoriteit Persoonsgegevens (AP)	www.autoriteitpersoonsgegevens.nl
Slovenia	Informacijski pooblaščenec (IP)	www.ip-rs.si
United Kingdom	Information Commissioner's Office (ICO)	www.ico.org.uk

Before lodging a complaint, we encourage you to contact us directly at support@quotanda.com so that we can attempt to resolve the matter directly and promptly.

## 13. Additional Information for UK Residents

If you are a UK resident, this section applies to you in addition to the rest of this policy. In the event of conflict between this section and the rest of the document, this section prevails for UK users.

### 13.1 Data Controller for UK Users

Entity	Quotanda (UK) Ltd
Companies House Number	14049752

<b>Registered Address</b>	11 The Terrace, London, England, SW13 0NP
<b>UK Privacy Contact</b>	uksupport@quotanda.com
<b>Website</b>	www.quotanda.com

Quotanda (UK) Ltd is a legally independent entity registered in England and Wales, and acts as data controller for the personal data of students resident in the United Kingdom who access the Quotanda portal.

### 13.2 Applicable Legal Framework

- UK GDPR: the UK General Data Protection Regulation, incorporated into UK law by the European Union (Withdrawal) Act 2018.
- Data Protection Act 2018 (DPA 2018): the UK data protection law that supplements and develops the UK GDPR.

The principles, rights and obligations set out in the rest of this Privacy Policy apply equally to UK users, as the UK GDPR is substantially equivalent to the EU GDPR.

### 13.3 International Data Transfers from the UK

- UK International Data Transfer Agreement (UK IDTA): for transfers to providers in the US and other countries without a UK adequacy decision, Quotanda (UK) Ltd uses the UK IDTA approved by the Information Commissioner's Office (ICO), the UK equivalent of EU Standard Contractual Clauses.
- UK Adequacy Decisions: the UK has recognised the European Union as a territory with an adequate level of protection, so data transfers between Quotanda (UK) Ltd and European group entities do not require an additional transfer mechanism.
- UK Extension to EU SCCs: in certain cases, for transfers to subprocessors already covered by EU SCCs, Quotanda (UK) Ltd applies the UK Addendum approved by the ICO as a valid transfer mechanism under the UK GDPR.

### 13.4 Your Rights as a UK User

As a UK resident, you have the same rights as EU users described in Section 10 of this policy (access, rectification, erasure, objection, restriction, portability and human review of automated decisions), recognised under the UK GDPR and the DPA 2018.

To exercise any of these rights as a UK user, contact us at:

- Email: [uksupport@quotanda.com](mailto:uksupport@quotanda.com)
- Postal address: Quotanda (UK) Ltd, 11 The Terrace, London, England, SW13 0NP

We will respond to your request within 30 days, in accordance with the UK GDPR.

### 13.5 UK Supervisory Authority

<b>Authority</b>	Information Commissioner's Office (ICO)
<b>Address</b>	Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
<b>Telephone</b>	0303 123 1113

<b>Website</b>	<a href="http://www.ico.org.uk">www.ico.org.uk</a>
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You have the right to lodge a complaint with the ICO if you believe that the processing of your personal data infringes the UK GDPR or the DPA 2018. We recommend that you contact us first at [uksupport@quotanda.com](mailto:uksupport@quotanda.com) to attempt to resolve the matter directly.

## 14. Cookies

Quotanda uses cookies and similar technologies on its portal and website. For detailed information on the types of cookies used, their purpose, and how to manage or disable them, please see Quotanda's Cookie Policy at: [www.quotanda.com/cookies](http://www.quotanda.com/cookies)

## 15. Changes to This Policy

Quotanda may update this Privacy Policy to reflect regulatory, operational or service changes. Updates will be published on the portal with the date of revision.

Where changes are substantial and materially affect your privacy rights, Quotanda will notify you through available contact channels with sufficient advance notice.

We recommend reviewing this policy periodically to stay informed about how your data is processed.