

# ACE

Accelerated Capability Environment

---

## Vivace Privacy Notice

Form Version 1.0

January 2025

---

# Contents

<b>Amendment History .....</b>	<b>3</b>
<b>1 Notice Statement.....</b>	<b>4</b>
<b>2 Vivace Privacy Notice .....</b>	<b>4</b>
<b>3 Information we collect .....</b>	<b>4</b>
<b>4 Uses made of your information .....</b>	<b>5</b>
<b>4.1 Information you give us .....</b>	<b>5</b>
<b>4.2 Information we collect about you .....</b>	<b>5</b>
<b>4.3 Information we receive from other sources .....</b>	<b>6</b>
<b>5 Sharing information .....</b>	<b>6</b>
<b>6 Storing information.....</b>	<b>6</b>
<b>7 Retaining information .....</b>	<b>6</b>
<b>8 Data security .....</b>	<b>7</b>
<b>9 Your rights – correcting/updating/deleting personal information .....</b>	<b>7</b>
<b>10 Contact us .....</b>	<b>7</b>
<b>11 Other .....</b>	<b>8</b>
<b>12 Changes to our Privacy Notice .....</b>	<b>8</b>
<b>13 “GDPR” definition.....</b>	<b>8</b>

# Amendment History

AMENDMENT HISTORY			
Ref	Date	Change Comments	Updated By
1.0	January 2025	Privacy Notice released	Charlotte Liddle & Ned Davy

# 1 Notice Statement

The Accelerated Capability Environment (ACE) is a Home Office capability within the Homeland Security Group. ACE is delivered through a partnership between the Home Office and a Private Sector Partner, QinetiQ Limited (Vivace). It combines expertise from industry and academia to innovate collaboratively and create mission impact at pace. In the context of personal information collected within ACE, the Home Office and Vivace are both considered separate Data Controllers; this Notice sets out how Vivace handles personal information collected from persons who provide personal information to ACE. Vivace is committed to safeguarding all personal information we collect from individuals in the course of our business.

## 2 Vivace Privacy Notice

Personal information may be provided following an invitation from Vivace, or in the course of any marketing and /or event communication processes, such as in-person, email, telephone, text messaging, direct mail and online.

Personal information means any information relating to an identified or identifiable natural person; an identifiable person is one who can be directly or indirectly identified by reference to an identifier such as name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

Sensitive personal information is a subset of personal information and is generally defined as any information related to racial /ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, or other medical information including biometric and genetic data, or sexual life preferences. In some instances, sensitive personal information may also include criminal allegations or convictions, precise geolocation information, financial and bank account numbers and unique identifiers such as government issued security numbers, driver's licence, and passport numbers.

We may collect personal information directly from you in the course of sales or purchasing activities and/or in connection with marketing events, for instance: business cards; personal contact details; emails and other social media.

In some circumstances we may also collect personal information about you from third parties, such as your employer, or professional organisations to which you belong, or personal information that you have placed in the public domain, such as from Facebook or LinkedIn.

By providing your personal information as described above, you are accepting and consenting to the practices described in this Privacy Notice, and you agree to the transfer, storing or processing of your personal information in the manner described in this Notice.

If you subsequently wish to withdraw your consent to the collection and handling of your personal information, then you may contact us. See the Contacting Us section below.

'You', 'your', 'user' and other similar terms refers to any person who provides their personal information to either a company or an individual working for Vivace.

'We', 'our' and 'us' shall refer to Vivace.

'Websites' and 'Platforms' means all of Vivace's collaborative environments, including, but not limited to, the Vivace M365 environment, Vivace SharePoint sites, Teams, Curtis Fitch and the ACE Cloud Platform. Other websites, which are not operated by Vivace, reached by links from these sites are not covered by this Notice. We encourage our users to be aware of third-party sites and to read the privacy statements and cookie policies of each and every website that collects personal information. Please note that we do not accept any responsibility or liability for policies or the use and/or reliance of data appearing on other websites.

## 3 Information we collect

We collect and process the following personal information (which may in certain circumstances include sensitive personal information) about you:

**Information you give us.** This is information about you that you give us, whether by completing forms, corresponding with us by phone, e-mail, text messaging, direct mail, online, or otherwise. It also includes information you provide us through electronic or hard copy business cards, for instance, and other processes such as: contact forms; content download requests; event registration forms; information request forms and/or when you report a problem with our websites.

With regard to any of your **visits to our Websites** we will automatically collect the following information:

- technical data, including the Internet Protocol (IP) address used to connect your computer to the Internet, your browser type and version, browser plug-in types and versions, operating system and platform; and,
- information about your visit, including the full Uniform Resource Locators (URL) clickstream, through and from our sites; products and/or services you viewed or searched for; interaction information (such as scrolling, clicks and mouse-overs), and methods used to browse away from the page.

## 4 Uses made of your information

### 4.1 Information you give us

---

We will use this information for the purposes of administration, commercial business operations and logistics related purposes, including:

**Contact and communication:** We may use your contact information and preferences to send you information that we may circulate from time to time, including news about any events we are organising or participating in, news and details about events and/or requirements from third parties that relate to Vivace or Vivace products and/or services, information about us, the products and/or services that we or companies within the Vivace Community provide, respond to any user enquiries, and/or seek feedback on your interaction and work with Vivace.

**Provision of services:** If specific personal information is necessary to supply a particular service (e.g. an e-mail address for electronic information updates) then this service is only available to those users who provide this information.

**Supplier management:** we may use your personal information for the purpose of carrying out specific Vivace functions, including but not limited to the evaluation, selection and management of suppliers and carrying out governance activities before, during and after commission deliveries. We may also use your personal information where it is required for the purposes of using any goods and/or services you provide and/or to set up the provision of your services as a supplier.

**Profiles:** We may use full contact details to create a profile of our users. A 'profile' is stored information we keep on individual users.

**Websites:** Our Websites and other Platforms provide messaging facilities and other forums for social collaboration and professional peer connection to individuals who work with Vivace, and the personal information you choose to post, share, upload or make available using these facilities is public and available to others who choose to use those services.

### 4.2 Information we collect about you

---

We will use this information:

- to administer our Websites and Platforms and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to provide access to other Vivace websites and other systems that require extra levels of security and verification checks;

- to improve our websites to ensure that content is presented in the most effective manner for you and for your computer;
- as part of our efforts to keep our websites safe and secure;
- to allow you to participate in interactive features of our service, when you choose to do so;
- to make suggestions and provide information to you and other users of our websites about us and the products and/or services we and other Vivace companies provide.

## 4.3 Information we receive from other sources

---

We will combine information we receive from other sources (such as your employers) with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on what information it is we receive).

We will only collect and handle your personal information in accordance with your contact preferences. You can also subsequently inform us of your contact preferences, including any request to withdraw your consent to the collection and handling of your personal information. See 'Contacting Us'.

## 5 Sharing information

Although we make every effort to preserve user privacy, we may need to disclose personal information with third parties for legal reasons, such as:

- to comply with legal obligations and respond to requests from government agencies, including law enforcement and other public authorities; or
- in the event of a merger, sale, restructure, acquisition joint venture, assignment, transfer or other disposition of all or any portion of QinetiQ's business assets.

When we share personal information, we do so in accordance with data privacy and security requirements. All of our employees and contractors are required to follow a data Privacy Policy when handling personal information.

Personal information may be shared under contractual control with other companies who collect and handle personal information on our behalf. For these purposes information may be transferred to other companies located outside the European Economic Area. Any personal information that is transferred will be protected in accordance with applicable laws. When we transfer personal information from the European Economic Area to other countries in which applicable laws do not offer the same level of data privacy protection as GDPR, we take measures to provide an appropriate level of data privacy protection. Personal information may also be shared with other government departments, agencies and public bodies (including their respective contractors) for the purposes of evaluating any proposal you provide and for the purposes of receiving and/or using any goods and/or services you provide. Personal information may also be shared with the Home Office or its representatives for the purposes of carrying out specific functions for which it is responsible under ACE.

Our contact details, set out in the "Contacting Us" section below, may be used for all data protection purposes, including where the other company involved is located outside the European Economic Area.

## 6 Storing information

We take steps to ensure that information we collect is processed according to this Privacy Notice, the Data Protection Act 2018 and requirements of UK GDPR and other applicable laws.

## 7 Retaining information

Vivace will only retain your personal data for as long as it is needed for the purposes set out in this Notice, for as long as the law requires us to, or as otherwise agreed with you.

We may be required to use and retain information for legal and compliance reasons, such as the prevention, detection, or investigation of a crime; loss prevention or fraud. We may also use personal information to meet our internal and external audit requirements, information security purposes, and as we otherwise believe to be necessary or appropriate:

- a) under applicable law;
- b) to respond to requests from courts, law enforcement agencies, regulatory agencies and other public and government authorities;
- c) to enforce a contract; or
- d) to protect our rights, privacy, safety or property or those of other persons.

## 8 Data security

We have physical, electronic and administrative security processes in place in our facilities to protect against the loss, misuse, unauthorised access, or alteration of information. Our company uses secure encryption technology, for all sensitive and financial personal information entered onto our websites.

Despite this, the transmission of information via the internet is not completely secure and we cannot guarantee the security of your personal information transmitted to our websites; any transmission is at your own risk. We do not accept liability for any interception of your personal information that may occur.

## 9 Your rights – correcting/updating/deleting personal information

If you wish to correct and/or update information or you no longer require our service, you can notify us of this change by contacting us.

You may, where permitted by the Data Protection Act 2018 and other applicable laws or legislation, submit a Subject Access Request (“SAR”) to the Data Protection Officer to:

- check whether we hold your personal information; and/or
- require us to provide you with a copy of your personal information; and/or
- require us to correct or delete or restrict the processing of any of your personal information that is inaccurate or that you don’t want us to hold. This request should be made in writing to our contact address.

## 10 Contact us

If you want to contact us with any questions, please contact us at:

The Data Protection Officer  
QinetiQ Limited  
Cody Technology Park  
Farnborough  
Hampshire  
GU14 0LX  
UK

E-mail: [DPOFFICE@QinetiQ.com](mailto:DPOFFICE@QinetiQ.com)

## 11 Other

Emails and other electronic communication with us may be monitored. Calls to us may be recorded for business continuity, quality control, regulatory and/or monitoring purposes.

## 12 Changes to our Privacy Notice

We may, from time to time, make changes to our Privacy Notice. Please check back frequently to see any updates or changes to our Privacy Notice.

## 13 “GDPR” definition

As from 26 May 2021 (i) GDPR as it forms part of the law of England and Wales by virtue of section 3 of the European Union (Withdrawal) Act 2018 (“UK GDPR”); (ii) any laws or regulations ratifying, implementing, adopting, supplementing or replacing the GDPR.