

## Privacy Notice

This notice is issued on behalf of Torc Partners Limited (the 'Company'). It contains details of how we use your personal data if you visit our website, or if you engage with our services.

UK and European Union citizens' personal data are protected under the General Data Protection Regulation ("GDPR") and this notice is drafted to provide individuals with all privacy information required under that law.

To help you navigate this notice online, you can click on any of the headings below to go straight to the information you need, without reading through the whole notice.

## Introduction

This notice is addressed to any living person on whom the Company collects or obtains personal data whilst undertaking its business and providing its services. The Company is the data controller of your personal data and will make decisions about the processing of your personal data in accordance with the terms of this notice.

Personal data is defined as *information relating to a living individual, from which that individual can be identified either directly or indirectly.*

The Company takes its data protection and privacy obligations seriously and this notice explains how your personal data will be processed and protected, as well as informing you about certain legal rights you have.

## Who we are and how to contact us

Name: Torc Partners Limited

Registered Address: 20-22 Wenlock Road, London, N17GU

E-mail: [contactus@torcpartners.com](mailto:contactus@torcpartners.com)

Torc Partners Limited is a company registered in England and Wales with company number 14330500

## What type of information we collect

When visiting this website, we may collect details of your visits to this website and the materials that you access. For representatives of organisations which the Company may have relationships with or provide services to, we may collect the following information about the owners, controllers and key personnel within the organisation:

- Identifying information (i.e. information used to identify a specific individual, such as: given name(s), preferred name(s), nickname(s); date of birth/age; place of birth;)
- Contact information (i.e. postal address; telephone number; email address)
- Professional information (i.e. job titles; employment history)

### **How we get the information and why we have it**

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Your decision to view this website and view any materials on it
- In relation to our business relationship or potential business relationship with you

### **We also receive personal information indirectly, from the following sources in the following scenarios:**

- Your employer, if you are employed by an organisation that the Company has a contractual relationship with
- Publicly available sources, such as Companies House or FCA in the UK when obtaining evidence of ownership, control or other affiliation with any company
- Third party data providers when undertaking screening in relation to our obligations in relation to employment/resourcing

We never collect personal data from, or about, children or any person under the age of 18.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are one or more of the following:

- (b) We have a contractual obligation
- (c) We have a legal obligation
- (f) We have a legitimate interest

If we are required by law to collect personal data, or you are required to provide personal data under the terms of a contract we have with you, your employer or an organisation under your ownership or control and you fail to provide the personal data when requested,

we may not be able or be permitted to proceed to enter into a contract or complete a transaction and we may need to terminate our business relationship.

### What we do with the information we have

We will use your personal data to:

- Help us meet our duties under a contract we have with you, your employer or an organisation that you own or control
- Manage our operations and improve our service to you
- Meet any legal or regulatory requirements
- Undertake statistical analysis for business improvement

The table below sets out the activities we process your personal data for and the lawful bases we rely on:

Business Activity	Personal Data	Lawful Activity
Training and monitoring, improving our processes and services	Identifying Data Contact Data	We have a legal obligation  We have a legitimate interest in performing our services and conducting our business
Managing our relationship with you which can include: <ul style="list-style-type: none"> <li>• notifying you about changes to our terms or this notice</li> <li>• notifying you about opportunities to work with the Company, which you might be interested in</li> </ul>	Identifying Data Contact Data	We have a legal obligation  We have a contractual obligation  We have a legitimate interest to invite members of our network to engage
Providing you with updates and newsletters from time to time regarding our activities and market updates which you may find interesting.	Identifying Data Contact Data	Consent- users must actively provide their consent when subscribing to our newsletter.  We have a legitimate interest to provide clients with this information in performing our services and conducting our business

### **Sharing or disclosing your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- Internal Third Parties
- External Third Parties, who we may use to support our data analysis and reporting
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If any part of the Company is acquired, then the new owners may use your personal data in the same way as set out in this Notice

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We do not sell your personal data and we have not sold any personal data within the last 12 months.

### **Security Measures and how we store your information**

Your information is securely stored on our servers in the UK and with limited access (password protected) we take steps to protect your personal information from unauthorised access or unlawful processing, accidental loss, destruction and damage.

The Company uses software provided by cloud service providers, so any personal data we receive by email or that is otherwise stored on the cloud will be stored within the EU and/or the UK.

The Company will always seek to utilise secure data transfer mechanisms for any required transfer of personal data to an external party.

We keep the personal data we obtain about you for the duration of our business relationship with you and for as long as we reasonably require it up to a maximum of 7 years after our relationship has ended, as permitted by law and in accordance with our internal data retention policy. In no circumstances will we retain personal data for longer than is necessary for the purpose for which it was collected, unless required to meet our legal or regulatory obligations.

We will then securely dispose your information either by permanent deletion or total, irreversible anonymisation.

### **Your data protection rights**

Under data protection law, you have rights including:

**Your right of access** – You have the right to ask us for copies of your personal information. You can request this using any of the contact information below and we will provide a full response within 30 calendar days

**Your right to rectification** – You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete

**Your right to erasure** – You have the right to ask us to erase/delete your personal information in certain circumstances

**Your right to restriction of processing** – You have the right to ask us to restrict the processing of your information in certain circumstances

**Your right to object to processing** – You have the right to object to the processing of your personal data in certain circumstances

**Your right to data portability** – You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you

If you wish to exercise your data protection rights and make a request, please contact us at [\*\*contactus@torcpartners.com\*\*](mailto:contactus@torcpartners.com).

If you are in the UK and you are unhappy with how we have used your data, you can also speak to the ICO ('Information Commissioner's Office') Wycliffe House, Water Lane, Wilmslow, Cheshire

### **CHANGES TO OUR PRIVACY POLICY**

We may change our Privacy Policy from time to time – it was last updated in August 2022. We will always update this Privacy Notice on our website, so please try to read it when you visit the website.