

Torse Ltd Privacy Policy

Torse Limited ("Torse") understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our stakeholders – clients, suppliers, partners and employees – and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Our contact details

Name: R Bigge Operations

Registered Office Address:

Torse Ltd., 35 Burlington Road, Nottingham, NG5 2GR

Phone Number: 0115 910 9190

E-mail: registration@torse.co.uk

Policy Renewal Date 1st January 2024

Set out below are the key pieces of information required.

- the types of personal data we collect;
- where data is gathered from, if it wasn't from you;
- why we have this information and what we're doing with it;
- the lawful basis and our legitimate interests where relevant;
- who we share people's information with; and
- how long information is held for before getting rid of it securely.

The type of personal information we collect

We currently collect and process the following information:

- Personal identifiers:
contacts information (for example, name and contact details).
- Additional Contact information including:
Email address, mobile and or landline phone number. Home address;
invoiced property and additional site location addresses for owners or occupiers.
- Business information including:
Business name, business contact details (email, web site URL, phone number), key person details including job title, profession.
- Third Part data sources:
In addition to the client data referred to above, on occasion it is necessary to source specific data from our supplier partners.

How we get the personal 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:

We collect this data from our clients in fulfilment of our commercial obligations; from individuals via email, the Torse website, telephone or by post.

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

- This may include metering companies, Energy Suppliers, utility industry data processors (e.g. Electricity Central Online Enquiry Service), Meter assets organisations for meter read and consumption data. Data is also gathered for Client Energy Contract details (e.g. pricing, conditions, term, etc.)
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We may share this information with any organisations where a legal requirement exists.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting registration@torse.co.uk

(b) We have a contractual obligation.

(c) We have a legal obligation.

(d) We have a legitimate interest.

In all other circumstances we will not share your information with any third parties.

How we store your personal information

Your information is securely stored, on in-house systems internally and off-site Torse related premises. This data is held in the UK.

As a matter of course the vast majority of data is stored digitally. We keep a limited amount of hard copy data e.g. copy bills, copy contract information etc. This data is maintained for a time period of up to 10 years.

This is primarily to protect Clients in the case of any contractual disputes. [There are extreme examples of disputes with suppliers going back over extended periods beyond 10 years].

Should clients wish to have data removed before this time, they may submit (corroborated) in the first instance requests in writing using letter headed documentation.

We will then dispose your information by secure shredding in regards to hard copy. Digital records (including Back-ups and Disaster Recovery) will be permanently deleted.

There will at this point be no longer any recovery options.

Checklist

- ☐ We have reviewed the purposes of our processing activities, and selected the most appropriate lawful basis (or bases) for each activity.
- ☐ We have checked that the processing is necessary for the relevant purpose, and are satisfied that there is no other reasonable and less-intrusive way to achieve that purpose.
- ☐ We have documented our decision on which lawful basis applies to help us demonstrate compliance.
- ☐ We have included information about both the purposes of the processing and the lawful basis for the processing in our privacy notice.
- ☐ Where we process special category data, we have also identified a condition for processing special category data, and have documented this.
- ☐ Where we process criminal offence data, we have also identified a condition for processing this data, and have documented this.

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.

Your right to rectification - You have the right to ask us to rectify personal 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 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 personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal 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.

Please contact us at

registration@torse.co.uk

Torse Ltd

35 Burlington Road,

Nottingham

NG5 2GR

if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at

registration @torse.co.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>