

TOR FINANCIAL PLANNING LTD

PRIVACY NOTICE

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INTRODUCTION

Thank you for choosing to be part of our community at Tor Financial Planning Ltd (“**Company**”, “**we**”, “**us**”, or “**our**”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at office@torfinancial.co.uk.

When you visit our website <http://www.torfinancial.co.uk> (the “**Website**”), and more generally, use any of our services (the “**Services**”, which include the Website), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

This privacy notice applies to all information collected through our Services (which, as described above, includes our Website), as well as any related services, sales, marketing or events. The information that you provide to us will be treated in accordance with the General Data Protection Regulations which is known as GDPR. If you submit any information to us by using this form, you are confirming that you accept the terms of our Privacy Notice.

Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.

1. WHAT INFORMATION WE COLLECT

Tor Financial Planning Ltd is a Data Controller that processes data in accordance with the Data Protection Act 1998. In order to advise you properly we collect data about you and your family through the filling in of client questionnaires, note taking and by keeping records of telephone conversations and other communication.

- **Personal information you disclose to us**

In Short: We collect information that you provide to us.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Website or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Website, the choices you make and the products and features you use. The personal information we collect may include the following:

We collect names; phone numbers; email addresses; mailing addresses; and other similar information.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

- **Information automatically collected**

In Short: Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Website.

We automatically collect certain information when you visit, use or navigate the Website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about who and when you use our Website and other technical information. This information is primarily needed to maintain the security and operation of our Website, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes Log and Usage Data. Log and usage data is service-related, diagnostic usage and performance information our servers automatically collect when you access or use our Website and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity in the Website (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).

2. HOW WE USE YOUR INFORMATION

In Short: We process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Website and elsewhere for a variety of business purposes described below. We process your personal information for these purposes in

reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To facilitate account creation and logon process.** If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract.
- **To post testimonials.** We post testimonials on our Website that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and the content of the testimonial. If you wish to update, or delete your testimonial, please contact us at office@torfinancial.co.uk and be sure to include your name, testimonial location, and contact information.
- **Request feedback.** We may use your information to request feedback and to contact you about your use of our Website.
- **To enable user-to-user communications.** We may use your information in order to enable user-to-user communications with each user's consent.
- **To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.
- **To send administrative information to you.** We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- **To protect our Services.** We may use your information as part of our efforts to keep our Website safe and secure (for example, for fraud monitoring and prevention).
- **To enforce our terms, conditions and policies for business purposes** - to comply with legal and regulatory requirements or in connection with our contract.
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **Fulfil and manage your orders.** We may use your information to fulfil and manage your orders, payments, returns, and exchanges made through the Website.
- **To deliver and facilitate delivery of services to the user.** We may use your information to provide you with the requested service.

- **To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.

3. WILL YOUR INFORMATION BE SHARED

In Short: We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfil business obligations.

We may process or share your data that we hold based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfil the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honour this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

4. DO WE USE COOKIES

In Short: We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies to access or store information.

Cookies cannot be used to identify you personally. These pieces of information are used to improve services for you through, for example:

- enabling a service to recognise your device so you don't have to give the same information several times during one task
- recognising that you may already have given a username and password so you don't need to do it for every web page requested
- measuring how many people are using services, so they can be made easier to use and there's enough capacity to ensure they are fast
- analysing data to help us understand how you use our services so we can improve them.

Further details on the cookies set by Google Analytics, can be found on [here](#).

5. HOW LONG DO WE KEEP YOUR INFORMATION

In Short: We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than 1 year unless you enter into a services agreement with us that requires us to keep it for longer.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

6. HOW WE KEEP YOUR INFORMATION SAFE

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

7. WHAT ARE YOUR PRIVACY RIGHTS

In Short: In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:
http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Website. To opt-out of interest-based advertising by advertisers on our Website visit <http://www.aboutads.info/choices/>.

8. DO WE MAKE UPDATES TO THIS NOTICE

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

9. HOW CAN YOU CONTACT US

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO), Mr Julian Hawkes, by email at office@torfinancial.co.uk, by phone at 020 8090 6575, or by post to:

Mr Julian Hawkes
Tor Financial Planning Ltd
4 Cannon Court
High Street
Lymington, Hampshire SO41 9AQ
United Kingdom

Under the Data Protection Act you have a right, on the payment of a fee, currently £10 per person, to obtain a copy of the personal information we hold about you. If you believe that any information held is incorrect or incomplete, you should contact our Data Protection Officer at

our usual address. Any information that is found to be incorrect or incomplete will be amended promptly

10. INTELLECTUAL PROPERTY

Users of this site may not print, download or in any manner copy images or text from the site, except for personal, non-commercial use, without permission from Tor Financial Planning Ltd.