

Privacy Statement for Torquer Limited

Torquer Ltd (“Torquer”) is committed to safeguarding your privacy. Please read the following privacy statement to understand how Torquer handles and uses personal data we collect about customers.

What personal information does Torquer collect?

Torquer collects personal information from you when you provide it to us directly, or through your use of our website, for example:

- Information about yourself and the company you work for, when you contact us. This may include your name and contact details, your company name and company details, information about your role in the company, and how you heard about us.
- Transaction, billing and delivery information, if you make a purchase with us or contract for one of our solutions or services.
- Records of your interactions with us, e.g. if you send email feedback to our website, ask a technical question, report a problem or otherwise contact us.
- If you interact with one of our consultants, for example at a trade show or customer premises.
- We may also record certain details of how you use our website, such as the website you came from or are going to, your device's unique ID, your IP addresses and operating system and information you download.

How does Torquer use my personal information?

Depending on how you interact with us, and the permissions you give us, we will use your personal information for the following purposes:

- To fulfil your order and/or provide you with the services you have contracted for.
- To maintain your contact details.
- To manage and respond to any queries or complaints.
- To improve and maintain Torquer’s website, and monitor its usage.
- For market research, e.g. we may contact you for feedback about our products and services.
- To send you information on our products and services where we have your consent or are otherwise permitted to do so.
- For security purposes, to investigate fraud and where necessary to protect ourselves and third parties.
- To comply with our legal and regulatory obligations.

We rely on the following legal bases, under data protection law, to process your personal information:

- Because the processing is necessary to perform a contract with you, or take steps prior to entering into a contract with you (e.g. where you have made a purchase with us, we use your personal data to process the payment and fulfil your order).
- Because it is in the legitimate interests of Torquer and your company, where you are submitting orders on your company’s behalf.
- Because we have obtained your consent (e.g. where you contact us with a query, where you provide additional personal information, or if you consent to receive marketing from us).
- Because it is in Torquer’s legitimate interests to maintain and promote our services. We are always seeking to understand more about our customers in order to offer the best products and services.

With whom does Torquer share my personal information?

Torquer needs to share information with certain selected third parties in order to operate our business:

- **Service Providers:** We provide information to our service providers acting on our behalf as well as to those third parties involved in the delivery chain (for example freight forwarders, couriers and delivery companies). On occasion, we also share personal information with our professional and legal advisors.
- **Government Authorities:** Where your order is due for delivery outside the UK, we may need to share information with customs authorities both in the UK and in the country of destination. We may also share personal information with law enforcement or other governmental authority, e.g. to report a fraud or in response to a lawful request.
- **Credit & Fraud Checking:** We may share information with credit reference agencies and with third parties engaged in fraud prevention and detection.
- **Media:** From time to time, we may release aggregated and anonymised marketing statistics to business partners, or may use these in press releases, advertising, or published reports. We would only personally identify you or any other customer in such press releases, advertising, or reports with your prior consent.
- Torquer may also disclose personal information in cases where we believe the disclosure is necessary to protect the rights, property or personal safety of Torquer, our customers, employees or the public, or where we are otherwise legally permitted to do so.

How secure is my personal information, and how long do Torquer keep it for?

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They may only process your personal information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. Please contact us if you would like more information about these safeguards.

We keep your personal information for as long as we need it for the purposes set out above, and so this period will vary depending on your interactions with us. For example, where you have made a purchase with us, we will keep a record of your purchase for the period necessary for invoicing, tax and warranty purposes. We may also keep a record of correspondence with you (for example if you have made a complaint about a product or service) for as long as is necessary to protect us from a legal claim.

Where we no longer have a need to keep your information, we will delete it. Please note that should you request to no longer receive marketing communications, we will keep a record of your email address to ensure we do not send you marketing emails in future.

How can I access, update, correct or delete my personal information?

If you have a query regarding your personal information please contact us using the details below. Under UK data protection law, you have the right to access (including in a machine-readable format), correct, and request the erasure of your personal data, and Torquer will comply with any requests to exercise these rights in accordance with applicable law. Please be aware, however, that there are a number of limitations to these rights, and there may be circumstances where we are not able to comply with your request.

Contact Us

For questions regarding this privacy notice or how we use your personal data, please contact us at:

*Torquer Ltd
Spey House
Dochfour Business Centre
Dochgarroch
Inverness
Scotland, UK
IV2 8GY*

Email: sandra.campbell@torquer.com

Tel: +44(0)1463 423113

You are also entitled to contact the UK Information Commissioner's Office if you have any questions or concerns regarding your personal information.

Updates to this Privacy Statement

We may change this privacy statement from time to time in order to reflect changes in the law, regulatory guidance or our data privacy practices in compliance with the law. When this happens and where required by law, we will provide you with a new or an updated notice detailing how the use of your personal information is changing and, if necessary, obtain your consent for the further processing.

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