

Website Privacy Policy

This Policy governs the use of personal data which you provide to us via our website. Personal data is any or all data relating to a natural person who is identified, or can be identified, from the data.

JFS Torbitt (“we”, “our”, “us”) respects your privacy. We understand that how your personal data is used and shared online matters to you, and we take the privacy of those who visit our website (“the Site”) very seriously. We will not collect any data other than when you contact us, and we will always process that data in compliance with the law. Our site may contain links to other sites and be aware that if you choose to click on those links, your data may be processed by other organisations hosting those sites. We cannot control or monitor this, and you should have regard to their Privacy Policies.

Please read this Privacy Policy carefully, and ensure you understand it. When you first use our Site, this is taken to be agreement to this Policy. If you do not accept the Policy, then you should stop using the Site immediately.

Who we are

- the Site is owned and operated by JFS Torbitt, 58 Durham Road, Birtley, DH3 1QJ
- our VAT number is 991 5160 06
- we are regulated by the ACCA
- we are a member of the ACCA

Your rights

You have certain rights as a data subject under the General Data Protection Regulation (GDPR), which governs the collection, processing and disposal of personal data by organisations such as ours.

In relation to personal data about you, you have the right:

- to be informed about how and why we collect and use the data
- to be given access to the data we hold
- to have any inaccurate or incomplete data rectified
- to ask us to delete personal data, earlier than we might already dispose of it
- to prevent us from processing the data further
- to object to us using the data for particular purposes

We provide contact details at the end of this Policy for you to use if you have any complaint about our processing of your personal data. If you are not satisfied with the way we deal with this issue, you have the right to lodge a complaint with the Information Commissioner’s Office (ICO), which is the body in charge of supervising personal data use in the UK.

What data do we collect?

If you communicate with us by e-mail, we will collect your name and e-mail address and any other content that you send to us in the body of the mail. We do not collect

any other personal data by any other method and in particular, we do not place cookies on our Site.

How is your data used?

We will process and store your data securely, and we will only keep it for as long as we need it for the purpose(s) for which it was collected.

In relation to the data we do collect, as laid out in the section above, we may use it as follows:

- to reply to your email
- Providing and managing your Account
- Providing and managing your access to Our Site
- Personalising and tailoring your experience on Our Site
- Supplying our services to you (please note that we require your personal data in order to enter into a contract with you)
- Personalising and tailoring our services for you
- Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by clicking 'unsubscribe' or directly in writing or by email to hello@ifstorbitt.co.uk)
- Market research
- Analysing your use of Our Site and gathering feedback to enable us to continually improve our website
- With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email and telephone and text message and post with information, news on our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003

You have the right to withdraw your consent to our use of your personal data at any time, and to request that we delete it

Data sharing

We may share your personal information with certain trusted third parties in accordance with contractual arrangements in place with them, including

- our professional advisors
- suppliers to whom we outsource certain support services
- Third parties engaged in the course of the services we provide to clients and with their prior consent, such as solicitors, barristers, other relevant professional providers and technology service providers such as data room services
- Third parties involved in hosting or organising events or seminars
- Third party search facilities for anti-money laundering checks including Smartsearch.com. You should review their privacy policies for more information on how they deal with your personal information
- Where necessary, or for the reasons set out in this policy, personal information may also be shared with regulatory authorities, HM Revenue and Customs, other, government agencies and law enforcement agencies. While it is unlikely, we may be required to disclose your information to comply with legal or regulatory requirements. We will use reasonable endeavours to notify you before we do this, unless we are legally restricted from doing so
- If in the future we re-organise or transfer all or part of our business, we may need to transfer your information to new RMT entities or to third parties through which the business of RMT will be carried out

- We may use social media sites such as Facebook, LinkedIn and Twitter. If you use these services, you should review their privacy policy for more information on how they deal with your personal information
- We do not sell, rent or otherwise make personal information commercially available to any third party, except with your prior permission.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

How and where do we store your data?

We will only keep your data as long as we need it for the purpose(s) for which it is collected, and/or for as long as we have your permission to hold it.

Your data will only be stored in the UK.

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data 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

Accessing your data

You are entitled to make a Subject Access Request under the GDPR. This means that you may request a copy of any personal data we hold about you, free of charge. We will provide any or all information in response to your request if you contact us on hello@jfstorbitt.co.uk

Contact Details

If you have any questions about the Site or this Policy, or you wish to make a Subject Access Request, then please contact us as follows, making your request or query clear:

e-mail: hello@jfstorbitt.co.uk

telephone: 0191 410 8300

postal address: Data Compliance Officer, JFS Torbitt, 58 Durham Road, Birtley, DH3 2QJ

Amending the Policy

We may change this policy from time to time, in response to changes in the law or for operational reasons. Any changes will immediately be posted on the Site and you will be deemed to have accepted the amended Policy if you continue to use the Site afterwards. You should therefore regularly review this Policy.