



Toru Ltd GDPR Privacy Policy

Last Updated: March 2025

Toru Ltd is committed to safeguarding your privacy and ensuring that your personal data is handled responsibly and transparently. This GDPR Privacy Policy outlines how we collect, use, store, and protect your personal data in compliance with the General Data Protection Regulation (GDPR).

The following points will guide you through our process:

1. Scope

This policy applies to all individuals whose personal data we collect, including clients, employees, suppliers, and contractors. It supplements our other internal policies on IT security, internet use, and marketing data processing.

2. Who We Are

Company Name: Toru Ltd

Registered Address: Stable Block, Delapré Abbey, London Road, Northampton, NN4 8AW

Company Number: 06683223

Data Protection Officer (DPO) Contact: Sean Toru, sean@toru.digital

3. What Data We Collect

We collect and process the following types of personal data:

- Identity Data – Name, job title, company name
- Contact Data – Email address, phone number
- Technical Data – IP address, browser type, device information
- Marketing & Communication Preferences – Subscription choices, consent for marketing
- Project-Related Data – Data required for service delivery

Special Categories of Personal Data

Toru Ltd does not collect or process special categories of personal data (e.g. health, biometric, political opinions) unless legally required and with explicit consent.

4. **How We Use Your Data**

We process personal data for the following reasons:

- To provide services – Designing and developing digital solutions.
- To communicate with clients – Project updates, support, and invoicing.
- To improve our services – Analysing user interactions to refine our digital offerings.
- For marketing purposes – Sending insights, newsletters, and event invites (with consent).
- To meet legal obligations – Compliance with tax, security, and regulatory requirements.

5. **Lawful Basis For Processing**

We ensure that all personal data processing is lawful under GDPR. At least **one** of the following legal bases will apply:

- Consent: You have given clear, explicit consent for processing (e.g. email marketing).
- Contractual Necessity: Processing is required to fulfil or prepare a contract with you.
- Legal Obligation: Compliance with laws (e.g. financial records, employment laws).
- Legitimate Interest: Processing is necessary for our business interests, unless overridden by your rights.

6. **How We Store And Protect Data**

We implement strict security measures to safeguard your personal data:

- Encryption of stored and transmitted data.
- Access control to limit data handling.
- Regular security audits and compliance checks.
- Secure storage for both digital and physical data.

Data Retention Policy

We retain personal data only as long as necessary:

- Client project data: Up to 6 years post-project for legal compliance.
- Marketing data: Until consent is withdrawn.
- Employee records: 6 years after employment termination.
- Financial records: 7 years for tax compliance.

Once data is no longer needed, it is securely deleted.

7. Your GDPR Rights

Under GDPR, you have the right to:

- ✓ Access your data – Request a copy of your personal data.
- ✓ Rectify inaccurate data – Correct incorrect or incomplete information.
- ✓ Request deletion ("Right to be Forgotten") – Have data removed unless legally required.
- ✓ Restrict processing – Limit how we use your data.
- ✓ Object to data processing – Particularly for marketing purposes.
- ✓ Data portability – Transfer your data to another service provider.
- ✓ Withdraw consent – At any time if processing is based on consent.

To exercise your rights, contact: sean@toru.digital

8. Subject Access Requests (SARs)

You may request access to your data by emailing sean@toru.digital.

- We will respond within one month.
- If your request is complex, we may extend the deadline by two months but will inform you.
- If a request is excessive, we may refuse it or charge an administrative fee.

9. Sharing Your Data

Toru Ltd does not sell your personal data. However, we may share data with:

- Third-party service providers (e.g. cloud hosting, analytics, marketing tools).
- Legal authorities (when required by law).
- Partners or contractors involved in service delivery.

All third parties comply with GDPR and have signed Data Processing Agreements (DPAs).

10. International Data Transfers

If we transfer data outside the UK/EEA, we ensure:

- EU Standard Contractual Clauses (SCCs) or UK International Data Transfer Agreements.
- Adequacy decisions (where applicable).

- Other recognised legal safeguards.

11. Data Breach Notification Process

In the event of a data breach:

- We will assess its severity.
- If high risk, we will notify affected individuals as soon as possible.
- If required, we will report the breach to the Information Commissioner's Office (ICO) within 72 hours.
- All team members must report breaches immediately to the DPO.

12. Cookies And Tracking Technologies .

We use cookies for analytics and marketing. You can manage cookie preferences via browser settings.

For full details, see our [Cookies Policy] (insert link here).

13. Updates To This Policy

We may update this policy periodically. Significant changes will be communicated via email or website notices.

14. Contact Us

If you have any questions or concerns about this policy, contact:

Toru Ltd

Email: sean@toru.digital

Phone: +44 (0) 1604 347493

Address: Stable Block, Delapré Abbey, London Road, Northampton, NN4 8AW

For complaints, you can contact the UK Information Commissioner's Office (ICO) at www.ico.org.uk.