

# **Website Data Privacy and Cookie Policy**

#### **About us**

This website is operated by Toros Consulting Limited (Toros) as part of its network of sites and subsites (together, **Toros Websites**).

#### Toros and what it does

Toros Consulting Limited was founded in 2014 by a team of individuals each with over 30 years of experience in the Telecoms and Data Centre markets. After years of working in these markets with major deployments across the globe, they formed Toros Consulting to focus on no-nonsense, practical product and service delivery putting the customer's business at the heart of the solution.

With a deep understanding of Data Centre, Telecoms and Security solutions, combined with practical experience in delivering customer value, our teams have developed partnerships with a range of product, consulting and project management services and a robust ITIL- based deployment methodology, we ensure your projects will deliver value to your business.

# **Data protection compliance**

Unless stated otherwise, Toros is the data controller in respect of all personal data collected on the Toros Websites which means that we are responsible for ensuring that we do so in full compliance with data protection and all other related privacy laws.

This Privacy Policy explains what information is collected about you, how it is used, and the steps taken to ensure that it is kept secure. We also explain your rights and how to contact us.

# Additional privacy information

Additional privacy terms, which form part of this Privacy Policy, apply to personal data and use of, certain Toros Websites and services. Please click on the relevant link(s) below to view the additional terms:

IT IS IMPORTANT THAT YOU UNDERSTAND AND ARE COMFORTABLE WITH THESE TERMS BEFORE USING THE RELEVANT WEBSITE AND/OR SERVICE AND WE ENCOURAGE YOU TO TAKE TIME TO READ THEM.



Service Link

There are no additional privacy terms at this time N/A

#### Links to other websites

Please note, Toros Websites may contain links to other websites (such as those of advertisers or our partners) that are not controlled by us, or our service providers. These links are provided for your convenience. We are only responsible for our own privacy practices and our security of Toros Websites. We recommend that you check the privacy and security policies and procedures of each and every other website that you visit.

#### The information we collect and its sources

In order to provide the goods or services you request, we will obtain details including:

- Contact details of those subscribing or registering for services, placing orders or making bookings and, where you do any of these things on behalf of another person we may require their contact details as well
- Supporting information other information that is relevant to the goods or services you request such as dietary requirements where you are attending an event where refreshments are provided, allergy information or treatment that may need to be given to help those attending events. Details of the particular support information needed will normally be shown on the particular Toros Website for the goods or service you require.
- Feedback and survey responses we receive from you and others

#### Where we obtain information

In most cases we will obtain information directly from you (or from someone who requests goods or services for you on your behalf) or the device you use to communicate with us. The information will be obtained through Toros Websites, telephone conversations, emails and written and verbal communications (including blogs and social media interactions) and from records of the goods and services provided to you.

We may supplement the information that you provide with other information that we obtain from our dealings with you (such as newsletters you have subscribed to, events you or someone you book for have attended, which we receive from other organisations, such as other commercial partners.



### Information about other people

If you provide information to us about any person other than yourself, you must ensure that they understand how their information will be used and that you are authorised to disclose it to us, and to consent to its use on their behalf, before doing so.

#### IP addresses

In order to understand how users use Toros Websites and our services and the things they are interested in, we may collect your Internet Protocol addresses (also known as IP addresses). Your IP address is a unique address that computer devices (such as PCs, tablets and smartphones) use to identify themselves and in order to communicate with other devices in the network.

#### Cookies

In common with many other website operators, we may use standard technology called 'cookies' on Toros Websites. Cookies are small pieces of information that are stored by your browser on your computer's hard drive and they are used to record how you navigate Toros' websites on each visit.

Our cookies are used to enable us to develop Toros Websites and to enable you to properly navigate it. We use cookies to collect personal information to enable us to reflect our users interests and by noting who has seen which pages, properties and advertisements (including 'click throughs' from emails), how frequently particular pages are visited and to enable us to determine the most popular areas of Toros Websites. We may use cookies to enrich your experience of using Toros Websites by allowing us to tailor what you see to what we have learned about your preferences during your visits to our sites. Sometimes we may use services of third parties and they may use cookies on our behalf in order to provide their services.

# **Preventing use of Cookies**

Most browsers automatically accept cookies, but you can usually change your browser to prevent cookies being stored. With experience, you can usually choose to switch off all cookies or to allow only certain 'trusted' sites to place cookies.

For further information on cookies and Flash cookies and how to switch them off see the Information Commissioner's website at <a href="https://www.allaboutcookies.org">www.allaboutcookies.org</a> or <a href="https://www.allaboutcookies.org">www.allaboutcookies.org</a> or <a href="https://www.allaboutcookies.org">www.allaboutcookies.org</a>.

PLEASE NOTE, IF YOU DO TURN COOKIES OFF, THIS WILL LIMIT THE SERVICE THAT WE ARE ABLE TO PROVIDE TO YOU AND MAY AFFECT YOUR USER EXPERIENCE.



### Tracking technology

Occasionally, we may use digital tracking (usually in a cookie) on Toros Websites or in emails we send to you. We use these to ensure you receive appropriate information and do not receive multiple communications about the same thing from different Toros related organisations.

### Preventing use of tracking technologies

If you stop cookies, this will normally stop any tracking from the website. Where we plan to use tracking technology, we will ask for your consent.

PLEASE NOTE, IF YOU DO NOT ALLOW US TO USE TRACKING TECHNOLOGY, YOU MAY RECEIVE COMMUNICATIONS THAT ARE OF LESS INTEREST TO YOU OR FROM ALL OF THOSE ORGANISATIONS THAT ARE INVOLVED IN PUTTING ON AN EVENT.

### How we will use your information

All personal information that we obtain about you and/or any other person whose details you provide will be recorded, used, and protected by us in accordance with current data protection legislation, our TERMS OF USE for the relevant Toros Website and any other terms and conditions that are relevant to the goods or services you request and this Privacy Policy. We will primarily use the personal information for:

- For registration and general administration (including verification and security checking), creating and administering login credentials and access controls for online services
- To provide the goods and services you request from us (including helping you with any specific needs you or others in your group may have)
- To communicate with you in the event that any goods or services requested are unavailable or if there is a guery or problem with your requests
- For record keeping purposes
- Market research. to carry out market research so that we can improve the goods and services we offer
- Service development. for research purposes and to enable us to understand requirements and develop cricket related services
- To track and analyse activity on Toros Websites and to understand the interests and views of prospects and customers



 Getting to know you. to create an individual profile for you so that we can enhance your user experience, to understand and respect your preferences and to provide newsletters and details of relevant offers and opportunities where you have agreed to receive them

### Consent and lawful processing of personal data

The legal basis for the collection and processing of your personal data is:

- For administration and service delivery: that it is necessary to fulfil the contract that you are going to enter into or have entered into with us
- For direct marketing: that you have given your consent
- For equality and inclusion: that you have given your explicit consent by answering the question
- In all other cases: that it is necessary for our legitimate interests which are to encourage participation in cricket and this does not prejudice or harm your rights and freedoms

### Disclosing your personal information

In order to provide our products and services, we may, occasionally, appoint other organisations to carry out some of the processing activities on our behalf. These may include, for example, technology hosts, printing companies and mailing houses. In these circumstances, we will ensure that personal information is properly protected and that it is only used in accordance with this Privacy Policy.

# **Payment information**

The payment card information you provide will only be available to the payment provider. This will not be available to Toros.

# Toros partner programme

Toros would like to contact you and/or any person whose information you provide to us to invite you to enjoy other products and services (where you have agreed to us sending an invitation), to provide newsletters and to tell you and/or them about offers and opportunities that are available and about a range of other initiatives in a number of ways, including by post, text message, email or, for relevant services, push notification, personalised on-screen messages and social media. Details of how to optin to or opt-out of receiving newsletters and details of offers are on relevant pages of the Toros Websites, in relevant forms you complete and/or in the electronic message you receive.



#### Preferences / Subscribe / Unsubscribe

You and any other person whose information you have provided to us can change your/their mind about whether you wish to receive details of offers and opportunities at any time by using any of the methods shown below (see the section 'How to contact us' below) or by following the instructions with each offer you/they receive.

### **Security**

We take the security of personal information seriously. We employ security technology, including firewalls, and Secure Socket Layers to safeguard information and have procedures in place to ensure that our paper and computer systems and databases are protected against unauthorised disclosure, use, loss and damage.

We only use third party service providers where we are satisfied that they provide adequate security for your personal data.

### **Monitoring**

We may monitor or record telephone calls for security purposes and to improve the quality of the services we provide to you.

#### **Data retention**

We will normally keep your personal data for two years unless we say otherwise in the privacy notice you are given. If, after this point, you have not taken up any further services, we will keep only minimal personal data about goods or services you have had from us, an outline of any incidents and details of any preferences or consents.

# Use of your information outside of Europe

Unless we say otherwise in the privacy notice you are given, we do not transfer personal data outside of the United Kingdom or the European Economic Area other than, potentially, to a few of our service providers based in the United States. Wherever we transfer your personal data outside of the European Economic Area, we will take proper steps to ensure that it is protected in accordance with this Privacy Policy and applicable privacy laws.

We will, of course, ensure that your information is transferred securely and in accordance with applicable privacy laws.



### Changes to this privacy policy

Privacy laws and practice are constantly developing and we aim to meet high standards. Our policies and procedures are, therefore, under continual review. We may, from time to time, update our security and privacy policies. If we want to make any significant changes in how we will use your personal data we will contact you directly and, if required, seek your consent.

We will ensure Toros Websites have our most up to date policy and suggest that you visit our privacy pages periodically to review our latest version.

### **Updating and correcting information**

You may update or correct your personal information online in relevant membership areas or by contacting us in writing or by email (see the section 'How to contact us' below). Please include your name, address and/or email address when you contact us as this helps us to ensure that we accept amendments only from the correct person. We encourage you to promptly update your personal information if it changes.

If you are providing updates or corrections about another person, we may require you to provide us with proof that you are authorised to provide that information to us.

# Your rights

You have a number of legal rights in respect of your personal data. These include:

- The right to receive a copy of the personal data that we hold about you. The same right applies to any other person whose personal data you provide to us. We will require proof of identity and proof of authority if the request comes from someone other than the person whose data we are asked to provide. This will ensure we only provide information to the correct person. We normally expect to respond to requests within 28 days of receiving them.
- Withdraw consent to direct marketing. You can exercise this right at any time and can update your preferences yourself or ask us to do it for you. See section 'Updating and correcting your personal data' above for details.
- Withdraw consent to other processing. Where the only legal basis for our processing your personal data is that we have your consent to do so, you may withdraw your consent to that processing at any time and we will have to stop processing your personal data. Please note, this will only affect a new activity and does not mean that processing carried out before you withdrew your consent is unlawful.



- If you consider any of your personal data is inaccurate, you can correct it yourself or ask us to do it for you (see section 'Updating and correcting your personal data' above for details).
- In limited circumstances you may be able to require us to restrict our processing of your personal data. For example, if you consider what we hold is inaccurate and we disagree, the processing may be restricted until the accuracy has been verified.
- In some circumstances, for example, where we have no legal basis for retaining your personal data, you may be entitled to require us to delete your personal data.
- Where our processing is based on it being in our legitimate interests, your rights and freedoms, based of your particular situation, may enable you to object to our processing.
- Where you have provided personal data to us electronically, you may be entitled to require us to provide that data to you electronically or to transmit it to another organisation.

#### How to contact us

#### Mail

Privacy Officer
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