

TIMEPARTNERS

Privacy Notice

Time Partners Limited (TPL) is committed to protecting your personal data and your privacy. We endeavour to ensure that any personal data we collect about you will be held and processed strictly in accordance with the Data Protection Act 1998 (DPA) and, on and from 25 May 2018, the European General Data Protection Regulation (GDPR). The terms Personal Data, Data Controller and processing have the meanings given to them in the GDPR unless otherwise indicated.

1. Scope

This Privacy Notice demonstrates how TPL handles the Personal Data you provide to us:

- by you interacting with us as a prospective, current or former client and in connection with ongoing services we are providing to you or your organisation;
- by you submitting information to us through our website <http://www.time-partners.com>;

2. Identity and Contact Details of Data Controller

For the purposes of the DPA and the GDPR, TPL is the controller of your data. If you have any queries regarding this policy or complaints about our use of your data, please contact us at the address below and we will do our best to deal with your complaint or query as soon as possible.

Time Partners Limited
33 St James's Square
London
SW1Y 4JS

3. Your data

When we collect personal data about you, this will comprise a combination of one or all of the following:

- your name;
- your contact details, consisting of professional / work telephone / mobile number, email address and office address;
- your job title;
- the name of your employer.

In exceptional circumstances, we may collect your private residential address where this is the same as your business address or where your business address is not known to us. We may be required to collect your private residential address in order to comply with Know Your Client (KYC) and/or Anti-Money Laundering (AML) and/or Counter Terrorism Financing (CTF) regulations or legislation.

We may in exceptional circumstances collect data about any past criminal convictions where you have disclosed this to us in the course of business.

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We will neither collect nor hold any other personal data relating to any of your personal financial situation, ethnicity, religion or other data that might be described as sensitive.

4. What we use your data for

Set out below are the purposes for which we may process your data and the legal basis for the processing:

To provide services to you

We are unable to provide services to you unless you disclose personal data to us. That may include the services set out in our Engagement Letter with you, our response to any enquiry you have submitted or another of our services.

As such, your disclosure of personal data to us is on the legal basis of our performance of our contract with you, our provision of services to you and our legitimate interest in so doing.

To comply with our legal or regulatory obligations

We are regulated by the Financial Conduct Authority (FCA) and may be under a duty to disclose your information to comply with FCA's Conduct of Business Rules, and / or any other relevant AML or CTF legislation or regulatory obligation.

To respond to requests for information from regulated bodies or government agencies

Exceptionally we may be requested or required to disclose to (for example) the FCA details about you and the services we provide. As such, our disclosure of your personal data to us is on the legal basis of our performance of our compliance with a legal obligation or our legitimate interest in so doing.

To keep you informed of any activities undertaken by us which we believe may be of interest to you

This use will include sending you emails from time to time.

5. How and where we store your personal information and how we keep your data secure

We are committed to ensuring the confidentiality of the personal data that we hold and continue to review our security controls and related processes to ensure that your personal data remains secure.

We store your physically held personal information in our London office. Your electronically held information is stored on cloud servers.

When we contract with third parties, we ensure they have appropriate security, privacy and confidentiality obligations imposed on them as part of our agreement with them to ensure that personal data is kept secure and prevented from unauthorised or accidental access, processing, copying, modification, erasure, loss or use.

We take all reasonable steps to protect your personal information; however, where you choose to transmit your personal data to us via the internet, we do not guarantee the security of the personal information transmitted and therefore any transmission is at your own risk.

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6. Our Cookie Policy

A cookie is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. We only use cookies that are required for the essential operation of our website. These cookies are typically deleted from your device once the browsing session is terminated.

You can choose to block cookies that we may deliver to your device through settings on your web-browser; however, in doing so you may not be able to access or utilize all aspects of our website.

7. When we may disclose your personal information

We may share your personal data with trusted third parties who perform tasks for us and help us to provide our services to you; and with other agencies where required by law, court order or regulation. These include:

1. Our partners and service providers, including service providers covering IT and website;
2. Regulatory or government agencies including any law enforcement, court, regulator or other government authority in order for us to comply with a legal obligation laid down by UK or EU law.
3. Any successor to all or part of our business, for example, to a prospective buyer where we may share your personal data as part of that transaction.

8. International Transfers

In certain circumstances, we may transfer your data to countries outside the EEA, which may not adhere to the same levels of data protection to which countries within the EEA are subject. Any such transfers are, at all times, made in accordance with the DPA and the GDPR.

9. Retention Period

We reserve the right to retain your personal information for as long as we reasonably believe it to be necessary in order to facilitate our legitimate interests, in order for us to comply with our legal or regulatory obligations or where your personal information remains public information by your own actions.

10. Your Rights in relation to your data

Under the GDPR, you will have the following rights in relation to how we process your data:

- Right to request access – you may obtain confirmation from us as to whether or not your data is being processed and, where that is the case, access to your data.
- Right to rectification and erasure – you have the right to obtain rectification of inaccurate personal data we hold concerning you and to obtain the erasure of your data without undue delay in certain circumstances.

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- Right to restriction of processing or to object to processing – you may require us to restrict the processing we carry out on your data in certain circumstances or to object to us processing your data.
- Right to data portability – you have the right to receive your data in a structured, commonly used and machine-readable format.
- Right to withdraw consent – where you have provided your consent to us processing your data, you have the right to withdraw your consent at any time. This can be done by contacting us at the above address at any time.
- Right to lodge a complaint – you may lodge a complaint with the Information Commissioner’s Office.
- For further information on your rights, please see the Information Commissioner’s website <https://ico.org.uk>

11. Additional Information

There is no statutory or contractual requirement for you to provide your data to us and you are not obliged to do so. Please note, however, that we may not be able to provide you with the services you have requested if you do not provide your contact details. As set out in our cookies policy, our website may not be able to function fully if you do not agree to certain cookies being set on your computer.

We do not undertake automated decision-making or profiling on your data.

We keep our privacy policy under constant review and may change it from time to time to reflect our practices or to remain compliant with relevant legislation. We will notify you of any material changes to our privacy policy via a notification on our website. Your continued use of this website or our other marketing services, following the posting of changes to these terms, will mean you accept these changes.

12. Links

Our website may contain links to other websites belonging to third parties. We do not control the privacy practices of these other websites.