



TORTUREID (TID) PRIVACY NOTICE

This version is effective from: 13.6.23

This notice (“**Privacy Notice**”) explains TortureID’s processing of your personal data in connection with the services that it provides to individuals affected by human rights abuses (“**Services**”) and your use of our website at <https://tortureid.org/> (“**Website**”).

This Privacy Notice also provides you with other important information about our processing of your personal data, including your rights.

Please take a moment to read and understand this Privacy Notice, as it is intended to assist you in making informed decisions in relation to your personal data. Your access to and use of our Website is also subject to our [Website Terms of Use](#).

We may from time to time notify you (by email or otherwise) of any significant changes that we make to this Privacy Notice, including to reflect any changes or proposed changes to our use of your personal data, but we encourage you to periodically review this Privacy Notice.

1 ABOUT US

The Website and our Services are made available by TortureID (TID) (“**we**”, “**us**”, “**our**”). TortureID is the data controller responsible for your personal data. We are an English company (No: 11375123) with our registered office at 24 Methley Mount, Chapel Allerton, Leeds, LS7 3NG, U.K.

2 HOW TO CONTACT US

If you have any questions about this Privacy Notice or want to exercise [Your rights as a data subject](#) set out in this Privacy Notice, you can contact us using the following methods:

Email	Send us an email at: admin@tortureid.org .
Post	Write to us at: 24 Methley Mount, Chapel Allerton, Leeds, LS7 3NG, U.K.

3 WHAT PERSONAL DATA WE COLLECT

In providing our Website and our Services, we may collect and process different types of personal data about you for different processing purposes. The types of personal data we collect depends on who you are and how you use our Website and our Services, and includes the following:

Identity Data	First name; last name.
Contact Data	Billing address; email address; telephone number;.
Profile Data	First name; last name; date of birth; gender; country; nationality; any other personal data that you or your solicitor may provide when we provide our Services to you; photographs of you; financial data such as bank details.

4 HOW WE COLLECT AND RECEIVE PERSONAL DATA

We collect and receive personal data using different methods:

Personal data you provide to us	You may give us your personal data directly, for example, when you work with us and receive our Services, or contact us with enquiries,.
Personal data given to us by someone who is providing a service to you.	If you are referred to us for a clinical report, your solicitor or another organization who refers you may provide us with personal data about you. If you have given consent, we may also contact your solicitor, GP or Social Services employee for information about how the report has helped you.
Publicly available personal data	From time to time, we may collect personal data about you (Identity Data, Contact Data or Profile Data) that is contained in publicly available sources (including open source data sets or media reports) or that you or a third party may otherwise make publicly available (for example through speeches at events or publishing articles or other news stories or posts on social media platforms).

5 WHO WE COLLECT PERSONAL DATA ABOUT

We collect and process personal data from the following people:

Clients	If you use our Services, we may collect and process your personal data in connection with the supply of services to you.
People who contact us with enquiries	If you contact us with an enquiry through our Website or provide any feedback to us, we will collect and process your personal data in connection with your interaction with us.
People who work for our clinicians and other suppliers	If you work for one of our clinicians or other suppliers and have responsibility for managing or providing services to us, or administering your organisation's account with us, we will process your personal data in connection with your organisation's relationship with us.
Job applicants	If you apply for a job with us, whether through the Website or otherwise, we will collect and process your personal data in connection with your application.

6 HOW WE USE YOUR PERSONAL DATA

We use your personal data for the purposes set out in this section. If we wish to make any changes to these purposes, or if we wish to use your personal data for any purpose that is not listed in this section, we will notify you using the contact details we hold for you.

Fulfilment of our Services.

Fulfilment of our Services	<p>We collect and maintain personal data that you submit to us for the purpose of supplying our Services. We may collect and process your personal data whether you are interacting with us on your own behalf or on behalf of any organisation you represent.</p> <p>The personal data we process may include your Identity Data, Contact Data, and Profile Data. We process this information so that we can fulfil the supply of Services, maintain our user databases and to keep a record of how our Services are being used.</p> <p><i>Our legal basis for processing</i></p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you, or it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that we provide the Services in an effective, safe and efficient way.</p>
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Contact Us.

If you have a general question or need help with any issue concerning our Website or our Services	<p>There are various ways in which you are able to contact us (see the "How to contact us" section above).</p> <p>When you make an enquiry, we will collect and process your Identity Data and Contact Data, as well as any other personal data you volunteer that is relevant to your enquiry. If you have a technical issue concerning diagnose the technical issues you are experiencing and to help us resolve them in an efficient way. We use this information to manage and respond to your enquiry.</p> <p>You can also voluntarily provide feedback by email.</p> <p><i>Our legal basis for processing</i></p> <p>It is in our legitimate interest to use your personal data in the ways described above to ensure that we are able to help you with your enquiry, provide a good standard of service and improve our customer services.</p>
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Recruitment.

If we use your personal data in connection with our recruitment activities	<p>We use your personal data for recruitment purposes, in particular, to assess your suitability for any of our positions that you apply for, whether such application has been received by us online, by email or by hard copy and whether submitted directly by you or by a third-party recruitment agency on your behalf. We also use your Identity Data and Contact Data to communicate with you about the recruitment process, to keep records about our recruitment process and</p>
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	<p>to comply with our legal and regulatory obligations in relation to recruitment.</p> <p>We will process any personal data about you that you volunteer, including during any interview, when you apply for a position with us. We may also process your personal data obtained from any third parties we work with in relation to our recruitment activities, including without limitation, recruitment agencies, background check providers, credit reference agencies and your referees.</p> <p>The personal data we process may include your Identity Data, Contact Data, Profile Data, details of your education, qualifications and employment history, any other personal data which appears in your curriculum vitae or application, any personal data that you volunteer during an interview or your interactions with us, or any personal data which is contained in any reference about you that we receive. Such information may also include special categories of personal data (such as information about your health, any medical conditions and your health and sickness records) and information relating to criminal convictions and offences if that information is relevant to the role you are applying for.</p> <p>We also use your personal data for the purposes of reviewing our equal opportunity profile in accordance with applicable legislation. We do not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by local legislation. All employment-related decisions are made entirely on merit.</p> <p><i>Our legal basis for processing</i></p> <p>Where we use your personal data in connection with recruitment, it will be in connection with us taking steps at your request to enter into a contract we may have with you or it is in our legitimate interest to use personal data in such a way to ensure that we can make the best recruitment decisions.</p> <p>We will not process any special (or sensitive) categories of personal data or personal data relating to criminal convictions or offences except where we are able to do so under applicable legislation or with your explicit consent.</p>
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Receipt of products and services from our suppliers.

<p>If we have engaged you or the organisation you represent to provide us with products or services</p>	<p>If we have engaged you or the organisation you represent to provide us with products or services (for example, if you or the organisation you represent provide us with services such as IT support, financial advice, or clinical services), we will collect and process your personal data in order to manage our relationship with you or the organisation you represent, to receive products and services from you or the organisation you represent and, where relevant, to provide our Services to others. The personal data we collect from you may include</p>
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	<p>your Identity Data and Contact Data and any other personal data you volunteer which is relevant to our relationship with you or the organisation you represent.</p> <p><i>Our legal basis for processing</i></p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you or the organisation you represent, or it is in our legitimate interest to use personal data in such a way to ensure that we have an effective working relationship with you or the organisation you represent and are able to receive the products and services that you or your organisation provides, and provide our Services to others, in an effective way.</p>
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Organisational administration and legal compliance.

<p>If we need to use your personal data to comply with our legal obligations or in connection with the administration of our organisation</p>	<p>We may use your personal data: (i) to comply with our legal obligations; (ii) to enforce our legal rights; (iii) to protect the rights of third parties; and (iv) in connection with a transition such as a merger, reorganisation, acquisition by another company, or sale of any of our assets.</p> <p><i>Our legal basis for processing</i></p> <p>Where we use your personal data in connection with a transition, to enforce our legal rights or to protect the rights of third parties, it is in our legitimate interest to do so. For all other purposes described in this section, we have a legal obligation to use your personal data to comply with any legal obligations imposed upon us, such as a court order.</p> <p>We will not process any special (or sensitive) categories of personal data or personal data relating to criminal convictions or offences except where we are able to do so under applicable legislation or with your explicit consent.</p>
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7 IF YOU FAIL TO PROVIDE YOUR PERSONAL DATA

Where we are required by law to collect your personal data, or we need to collect your personal data under the terms of a contract we have with you, and you fail to provide that personal data when we request it, we may not be able to perform the contract we have or are trying to enter into with you. This may apply where you do not provide the personal data we need in order to provide the Services you have requested from us. In these circumstances, we may have to cancel the provision of the relevant Services to you, in which case we will notify you.

8 HOW WE OBTAIN YOUR CONSENT

Where our use of your personal data requires consent, you can provide such consent at the time we collect your personal data following the instructions provided, or by informing us using the contact details set out in the "[How to contact us](#)" section above.

9 THIRD-PARTY LINKS

This Privacy Notice only applies to personal data processed by us through your use of our Website and/or in connection with our organisation's operations. However, from time to time,

our Website may contain links to third-party websites and services. We have no control over these websites and services and this Privacy Notice does not apply to your interaction with the relevant third parties.

When you use a link to go from our Website to another website (even if you don't leave our Website) or you request a service from a third party, your browsing and interactions on any other websites, or your dealings with any other third-party service provider, is subject to that website's or third-party service provider's own rules and policies, and the privacy notice (and other terms and conditions) of that relevant third-party platform will apply to you.

We do not monitor, control or endorse the privacy practices of any third parties. We encourage you to become familiar with the privacy practices of every website you visit or third-party service provider that you use in connection with your interaction with us and to contact them if you have any questions about their respective privacy notices and practices.

10 SHARING PERSONAL DATA

When processing your personal data, we may need to share it with third parties, as set out in the table below. We only share personal data with others when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations.

This list is non-exhaustive and there may be circumstances where we need to share personal data with other third parties.

<p>Third-party suppliers who provide applications/ functionality, data processing or IT services</p>	<p><i>We share personal data with third parties who support us in providing our Website and help provide, run and manage our internal IT systems. Such third parties may also include, for example, providers of information technology, cloud-based software-as-a-service providers, identity management, website design, hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them.</i></p>
<p>Payment providers and banks</p>	<p><i>We share personal data with third parties who assist us with the processing of payments and refunds.</i></p>
<p>Recruitment agencies and related organisations</p>	<p><i>We share personal data with external recruiters, third-party providers that undertake background checks on our behalf and other entities within our group of companies.</i></p>
<p>Auditors, lawyers, accountants and other professional advisers</p>	<p><i>We share personal data with professional services firms who advise and assist us in relation to the lawful and effective management of our organisation and in relation to any disputes we may become involved in.</i></p>
<p>Law enforcement or other government and regulatory agencies and bodies</p>	<p><i>We share personal data with law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with, applicable law or regulation.</i></p>
<p>Other third parties</p>	<p><i>Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, or to establish, exercise or defend legal rights. We will only fulfil requests for</i></p>

	<i>personal data where we are permitted to do so in accordance with applicable law or regulation.</i>
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11 TRANSFERS OUTSIDE THE UK AND THE EUROPEAN ECONOMIC AREA (“EEA”)

Where necessary in connection with our Services, we may transfer personal data to countries outside the UK and the EEA.

Countries outside the UK and EEA have different data protection laws to the UK and the EEA. In particular, such countries may not provide the same degree of protection for your personal data, may not give you the same rights in relation to your personal data and may not have a data protection supervisory authority to help you if you have any concerns about the processing of your personal data.

When transferring your personal data outside the UK or the EEA, we will, where required by applicable law, implement at least one of the safeguards set out below. Please contact us if you would like further information on the specific mechanisms used by us when transferring your personal data outside the UK or the EEA.

Adequacy decisions	We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission and/or the UK Government (as applicable).
Standard Contractual Clauses	Where we use certain service providers, we may use specific standard contractual clauses approved by the European Commission and/or the UK Government which give personal data the same protection it has in Europe and/or the UK.

12 HOW LONG WE KEEP YOUR PERSONAL DATA

In respect of personal data that we process in connection with the supply of our Services, we may retain your personal data for up to six years from the date of supply of the relevant Services and in compliance with our data protection obligations. We may then destroy such files without further notice or liability.

Where we process any other personal data, we will retain relevant personal data for up to three years from the date of our last interaction with you (and in compliance with our data protection obligations). We may then destroy such files without further notice or liability.

If any personal data is only useful for a short period (e.g. for a specific activity), we will not retain it for longer than the period for which it is used by us.

13 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL DATA

We are committed to keeping the personal data you provide to us secure and we have implemented information security policies, rules and technical measures to protect the personal data under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. In addition, all our employees and data processors (i.e. those who process your personal data on our behalf) are obliged to respect the confidentiality of the personal data of all users of our Website and those who use our Services.

14 YOUR RIGHTS AS A DATA SUBJECT

You have certain rights in relation to the personal data we hold about you. These rights include the right: (i) to obtain copies of your personal data; (ii) to have your personal data corrected or deleted; (iii) to limit the way in which your personal data is used; (iv) to object to our use of your personal data; (v) to transfer your personal data; (vi) not to be subject to decisions based on

automated processing (including profiling); and (vii) to complain to a supervisory authority. If you would like to exercise any of these rights, please contact us using the details set out in the [“How to contact us”](#) section above. For more information, **click here**.

Your right of access	If you ask us, we will confirm whether we are processing your personal data and, if so, provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may charge a reasonable fee for producing those additional copies.
Your right to rectification	If the personal data we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal data with others, we’ll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we’ve shared your personal data with so that you can contact them.
Your right to erasure	You can ask us to delete or remove your personal data in some circumstances, such as where we no longer need it or where you withdraw your consent (where applicable). If we have shared your personal data with others, we will let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal data with so that you can contact them directly.
Your right to restrict processing	You can ask us to “block” or suppress the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal data or you object to us processing it for a particular purpose. This may not mean that we will stop storing your personal data but, where we do keep it, we will tell you if we remove any restriction that we have placed on your personal data to stop us processing it further. If we’ve shared your personal data with others, we’ll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we’ll also tell you who we’ve shared your personal data with so that you can contact them directly.
Your right to data portability	You have the right, in certain circumstances, to obtain personal data you have provided to us (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer it to your chosen third party.
Your right to object	You can ask us to stop processing your personal data, and we will do so, if we are: (i) relying on our own or someone else’s legitimate interest to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or (ii) processing your personal data for direct marketing purposes.
Your rights in relation to automated decision-making and profiling	You have the right not to be subject to a decision when it is based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for the entering into, or the performance of, a contract between you and us.

Your right to withdraw consent	If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time. You can exercise your right of withdrawal by contacting us using our contact details in the " How to contact us " section above or by using any other opt-out mechanism we may provide, such as an unsubscribe link in an email.
Your right to lodge a complaint with the supervisory authority	If you have a concern about any aspect of our privacy practices, including the way we have handled your personal data, please contact us using the contact details provided in the " How to contact us " section above. You also have a right to lodge a complaint with our supervisory authority, the UK Information Commissioner's Office ("ICO"). Contact details for the ICO can be found on its website at https://ico.org.uk .