

Privacy Notice - Effective Date: 01/05/2018

1. Introduction

We are updating our Privacy Notice to take account of the **General Data Protection Regulation (GDPR)** of 24 August 2019. It applies from the date of this notice (though some of the rights mentioned in it are only relevant on & after 24 August 2019)

Accounting Solutions (NW) Ltd is registered with the Information Commissioners Office under UK regulations and our Registration Number is Z334683.

This privacy notice tells you what to expect when Accounting Solutions (NW) Ltd T/A Charles & Co collects personal information. It applies to information we collect about;

clients who use one of our services e.g. accountancy, payroll, bookkeeping, VAT, end of year submissions, HMRC & Companies House filing, financial services, consultancy;

prospective clients to whom we provide estimates;

visitors to our websites, or people who contact us via social media platforms;

job applicants and our **current and former employees**;

suppliers or prospective suppliers and/or providers of related services to our organisation;

other individuals in relation to a data protection or service complaint, or any other query.

SPECIAL NOTICE TO OUR CLIENTS & THEIR OWN DATA PROTECTION REQUIREMENTS.

This privacy notice relates to the personal data of our clients and their associates in control of a legal entity with whom we have a contractual relationship. We are the Data Controller for the purposes of data protection.

If any of our clients give us personal information relating to employees, members, customers, users, suppliers, or their business contacts, we will use this as necessary for us to act as Data Processors for the services we provide.

In terms of the privacy of such people (employees, members, tenants etc.) we will consider the client as Data Controllers and the responsibility to inform people that we are processing personal data rests with you.

Price Accounting will not respond to data requests directly from any of our clients' current or past employees, customers, tenants etc.

2. The types of data we collect and use:

Whether or not you become a client, we will use your data for the reasons set out below, and if you become a client we will use it to manage your account for the services you have agreed to. We may also use it to offer you new services via some of our partners e.g. pensions & other financial services.

Where there are two or more people on any forms, this privacy policy applies to each person separately. The personal data we use may include;

- Full name and personal details including contact information (e.g. home address & address history, email addresses, telephone & mobile numbers);
- Date of birth and/or age;
- Financial details (e.g. salary & details of other income, details of bank accounts, credit card accounts, and mortgage accounts, pension providers);
- Family, lifestyle or social circumstances if relevant to the product or service (e.g. the number of dependants you have);
- Education & employment details/employment status;
- Information (including a copy of your image) from/for credit reference and/or fraud prevention agencies (e.g. electoral role, passport details, driving licence numbers, utility providers, court records & debt judgements);
- *Login details – where you allow us to manage your personal financial and government agency related services. Records of other products and services that you allow us to manage for you.*
- Personal data about other named applicants. You must have the authority to provide their personal data to us and share this Privacy Notice with them beforehand, together with details of what you have agreed on their behalf.

3. Providing your personal data

Unless we tell you otherwise, you must provide your personal data so that we can provide you with their services you have requested or are enquiring about. In all cases the data must be accurate and in the required format.

4. Using your personal data: the legal basis and purposes

We will process your personal data

- a) As necessary for **our joint legitimate interests** e.g.:
 - i. For good accounting, payroll and tax processes
 - ii. To provide beneficial tax and profit outcomes
 - iii. To comply with statutory functions such as PAYE/RTI for HMRC
 - iv. To demonstrate good governance and monitoring of systems
 - v. To provide management reports that allow for strategic decisions
 - vi. For our mutual benefit and future growth
 - vii. To inform third parties such as mortgage providers or pension advisors where the person has requested us to do so.
 - viii. For benchmarking and marketing purposes to take advantage of new opportunities
 - ix. To send business & marketing newsletters to our current clients. Each such communication will have details of how to opt-out from the service.(For new clients we will specifically ask for consent to do so in our Terms of Engagement)
 - x. For prospective clients we will ask for enough personal information to allow us to send you a quotation for our services.

- b) As necessary **to comply with a legal obligation** e.g.:
 - i. To verify your identity, make credit, fraud prevention and anti-money laundering checks.
 - ii. For compliance with legal and regulatory disclosures (e.g. filing VAT & tax returns, or the right to work).

- iii. If you exercise your rights under data protection law and make requests.

5. Sharing of your personal data

Subject to the applicable data protection law we may share your personal data with:

- Other organisations in the Accounting Solutions (NW) Group;
- Companies and other persons providing services to us;
- Sub-contractors and other persons who help provide our products and services;
- Our legal and professional advisors;
- Your former accountants or professional advisors to allow us and them to handover current information to allow us to start providing your services;
- Government bodies and agencies in the UK and overseas (e.g. HMRC who may in turn share it with the relevant overseas tax authorities);
- The National Crime Agency under anti-money laundering regulations;
- Courts to comply with legal requirements, and for the administration of justice;
- In an emergency or otherwise to protect your vital interests.

6. Our data retention policy (including that of former clients & employees).

Due to the nature of the services we provide there is a statutory obligation on Price Accounting Ltd to retain records in case of an enquiry or investigation. These are defined in law for VAT, PAYE & Payroll, PAYE and Anti-Money Laundering Regulations.

We will hold all personal records relating to these and other services for a period of **seven years**. For the avoidance of doubt this period applies even if you cease to be a client or employee within that timescale.

7. How we keep your data secure.

Price Accounting is committed to ensuring that your privacy is protected. Should we ask you to give any information to us or via an enquiry from our website you can be assured that it will only be used in accordance with this Privacy Notice.

We use a dedicated IT services supplier to maintain our systems and storage and keep our security software up to date. We use encryption when needed and specifically to send payslips or other documents with sensitive personal & financial information

We use third party software to process personal data relating to our services and regularly check that there security and privacy policies are up to date.

8. Transferring data outside the EU.

Much of ours and our third party software uses 'cloud-based' storage. This means that the physical & virtual servers that the data is stored on may be outside the EU, mainly in the United States. In such cases we will regularly check that they have in place policies and procedures that comply with EU-U.S. and Swiss-U.S. Privacy Shield Frameworks regarding the collection, use, and retention of personal information transferred from the European Union, the European Economic Area, and Switzerland to the United States.

You can learn more about Privacy Shield at <https://www.privacyshield.gov/European-Businesses>

We may use sub-contractors with servers in India and have contracts in place with them on how they hold our data securely to prevent unauthorised access and data breaches.

9. Your rights under applicable data protection law.

Your rights are as follows (noting that these rights don't apply in all circumstances and that data portability is only relevant from May 2018).

- The **right to be informed** about our processing of your personal data: This will be done via this notice and any future updates. (See section 12).
- The right to have your data **corrected if it is inaccurate** and to have **incomplete personal data completed**;
- **Subject to our retention policy**, the right to **have your personal data erased** (the right to be forgotten);
- The right to **request access** to your personal data and information on how we process it. If you are a client, you will be given a log-in to the main system where we store personal details, and can check or amend the key details. For everyone else we will provide copies of the data and details of how we store it.
- The right to **move, copy or transfer your personal data** ('data portability'). This does not apply to data/transactions we hold in your accounting records, but we do supply the data required if you choose to change to another accountant.
- The **right to object** as to how we process your data. We will stop processing your data if you ask us to do so but the following applies to such a request:
 - i. We will stop processing when we have completed any transactions needed for our own legitimate interests, within 30 days of the end of an accounting period.
 - ii. We will advise you of any consequences of us stopping the processing which may affect your interests.
 - iii. A request to stop processing is not the same as a request to delete, as we need to keep data as described under our retention policy. (Section 6).

10. Use of our websites & cookies

Price Accounting is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy notice.

By information we mean information about you collected through our websites including your e-mail address and other information you give us.

Any information given to us will be retained and used solely for the purposes of fulfilling your request for information (on any of our products or services (free or paid for)).

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site.

The use of cookies is an industry standard -- you'll find them at most websites. For example, we may use cookies on the Site to verify the subscriber's login status. They are not used to store personal information, or to retain historical or transactional data.

Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Cookies and tags for remarketing

Remarketing cookies and tags are placed on our web pages to enable third party vendors (including Google) to show our ads (online display ads) on other websites to people who have previously visited our websites.

We do NOT share any personal information or details that you have given us.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Controlling your personal information

We will not sell, distribute or lease your personal information to third parties - EVER. We may use your personal information to send you promotional information about third parties which we think you may find interesting. We will ask for specific consent when you first become a client, and any marketing emails will have an unsubscribe option.

IP Addresses

An IP address is a number that's automatically assigned to your computer whenever you're surfing the web. Web servers, the computers that serve web pages, automatically identify your computer by its IP address. The company collects IP addresses for purposes of system administration, to report aggregate information to third parties and to track the use of the site.

When visitors request pages from the site or click on a link in a mailing sent through the service our servers log the visitors' IP addresses. We reserve the right to use IP addresses to identify a visitor or list member when it will enhance the users experience or if we feel it is necessary to enforce compliance with the site's policies or to protect the company, the site, its visitors, the service, our Internet Service Provider partners, the list members or others.

11. Change of Control / Asset Transfer

As the Company develops, we may buy other businesses or their assets or sell all or parts of our business assets. Customer information is generally one of the business assets involved in such transactions. Thus, in the event that the assets of the Company in whole or in parts are acquired by a third-party, customer information, including any visitor information collected through the site or the service, would be one of the transferred assets.

In the event of a corporate change in control or sale of all or parts of our business assets our users will be notified in accordance with the "Changes to this Policy" section of the policy if their personal information is provided to the new corporate entity or asset purchaser.

12. Changes to this Policy:

The terms of this Privacy Policy may change from time to time. We will notify you of any material changes to this Privacy Policy by posting a notice on the homepage of the Site for a reasonable period of time after such changes are made, that this Privacy Policy has been updated, and by changing the "Effective" date at the top of this Privacy Policy. We encourage you to check this page periodically for any changes. Your continued use of the site and participation in following the posting of changes to these terms will mean you accept those changes.

13. Contacting Us:

If you have any specific questions or requests relating to data protection and access to your information then contact our **Data Protection Officer (DPO)** at the address below.

If you wish to complain about any aspect of our services, please contact us at the address below.

You have the right to complain to the Information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection law. www.ico.org.uk

We value your opinions. If you have comments or questions about our Privacy Policy, please send them to:

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