

## **Privacy Policy - Data Protection Act 2018 ("DPA") and the General Data Protection Regulation ("GDPR")**

**Version 1.1.**

**Dated: 1 July 2018**

We confirm we are registered under the DPA and will comply with our obligations under the DPA and GDPR in collecting, using or processing any personal information that you may supply to us in connection with any work we undertake on your behalf and are committed to protecting your privacy. This privacy policy explains how we use any personal information we collect about you, when you use our services.

In this Privacy Policy, the following definitions shall apply:

‘client personal data’ means any personal data provided to us by you, or on your behalf, for the purpose of providing our services to you, pursuant to our engagement letter with you and relates to any information about a natural person that makes you identifiable, including (but not limited to):

Your name

Address

Phone numbers

E-mail address

Debit/credit card details

Personal tax details

National Insurance Numbers and ITRs

Details of you or your family including age, occupation, business and private interests

‘data protection legislation’ means all applicable privacy and data protection legislation and regulations including PECR, the GDPR and any applicable national laws, regulations and secondary legislation in the UK relating to the processing of personal data and the privacy of electronic communications, as amended, replaced or updated from time to time;

‘controller’, ‘data subject’, ‘personal data’, and ‘process’ shall have the meanings given to them in the data protection legislation;

‘GDPR’ means the General Data Protection Regulation ((EU) 2016/679); and

‘PECR’ means the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2426/2003).

The data controller is DSA Advisory Ltd, Nafferton Hall, Ironmonger Lane, Marlborough, Wiltshire, SN8 1HN.

We shall only process the client personal data:

1. in order to provide our services to you and perform any other obligations in accordance with our engagement with you;

2. in order to comply with our legal or regulatory obligations; and
3. where it is necessary for the purposes of our legitimate interests and those interests are not overridden by the data subjects' own privacy rights.

For the purpose of providing our services to you, pursuant to our engagement letter, we may disclose the client personal data to our regulatory bodies or other third parties (for example, our professional advisors or service providers). The third parties to whom we disclose such personal data may be located outside of the European Economic Area (EEA). We will only disclose client personal data to a third party (including a third party outside of the EEA) provided that the transfer is undertaken in compliance with the data protection legislation. We will not pass on your personal information to any third party unless you agree.

We may disclose the client personal data to other third parties in the context of a possible sale, merger, restructuring or financing of or investment in our business. In this event we will take appropriate measures to ensure that the security of the client personal data continues to be ensured in accordance with data protection legislation. If a change happens to our business, then the new owners may use our client personal data in the same way as set out in these terms.

We shall maintain commercially reasonable and appropriate security measures, including administrative, physical and technical safeguards, to protect against unauthorised or unlawful processing of the client personal data and against accidental loss or destruction of, or damage to, the client personal data.

In respect of the client personal data, provided that we are legally permitted to do so, we shall promptly notify you in the event that:

1. we receive a request, complaint or any adverse correspondence from or on behalf of a relevant data subject, to exercise their data subject rights under the data protection legislation or in respect of our processing of their personal data;
2. we are served with an information, enforcement or assessment notice (or any similar notices), or receive any other material communication in respect of our processing of the client personal data from a supervisory authority as defined in the data protection legislation (for example in the UK, the Information Commissioner's Officer); or
3. we reasonably believe that there has been any incident which resulted in the accidental or unauthorised access to, or destruction, loss, unauthorised disclosure or alteration of, the client personal data.

We will use all reasonable endeavours to ensure that personal information we hold is accurate and up to date and ask that if your details change that you notify us as soon as possible to assist us in doing so. If, however, you find any inaccuracies in the information we hold about you please notify us and we will make the necessary alterations to the information we hold.

Information held about you will only be kept for such period as we consider is necessary in order to comply with our professional indemnity and professional obligations which in the

majority of cases will be 6 years but in some cases, given the nature of the work we undertake, it may be necessary and at our discretion for us to maintain the information for a longer period and sometimes forever to protect your interests as well as our own.

**Contact us**

Please contact us if you have any questions about our Privacy Policy or information we hold about you by writing to DSA Advisory Ltd, Nafferton Hall, Ironmonger Lane, Marlborough, Wiltshire.

**Complaints**

If you feel that your personal data has been processed in a way that does not meet the GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority in the UK is the Information Commissioner's Office, [www.ico.org.uk](http://www.ico.org.uk).

**Changes to our Privacy Policy**

We keep our Privacy Policy under regular review and we will place any updates on this web page. In line with the new GDPR guidelines, this Privacy Policy was last updated on 1 July 2018, version 1.1.