

Data Protection and Privacy Policy

HW Accountancy Ltd treats the privacy of its clients very seriously and we take appropriate security measures to safeguard your information and privacy. This policy explains how we protect and manage any personal data* you share with us that we hold about yourself, members of staff, associates, or family members.

** Personal data means any information that may be used to identify an individual, including, but not limited to a first and last name, a home or other physical address or other contact information, including email address.*

How we obtain your personal data

Information provided by you: You provide us with personal data during our initial or subsequent meetings, via post, email, or over the telephone. This can include, but is not limited to, name, address, date of birth, national insurance number, unique tax payer reference, email address, phone number, bank account details. We use this information to be able to comply with anti-money laundering checks, and production of requested services such as payroll, self-assessment etc.

The provision of this personal data is essential for us to be able to comply with UK Law and HMRC requirements. This means the legal basis of our holding your personal data is for the performance of a contract.

Information we get from other sources: We only obtain information from third parties if this is permitted by law. We may also use legal public sources to obtain information about you, for example to verify your identity.

This information (including your name, address, email address, date of birth, etc.) as relevant to us, will only be obtained from reputable third-party companies that operate in accordance with the Data Protection Act 2018. You will already have submitted your personal data to these companies and specifically given permission to allow them to pass this information to other companies that provide similar or complementary products or services to those we offer.

How we use your data We use personal data to manage and administer accountancy and taxation services for your needs. We may also act as controller and/or processor of this information. We undertake at all times to protect your personal data, including any financial details, in a manner which is consistent with your accountants/tax advisors duty of professional confidence and in the requirements of the Data Protection Act 2018. We will also take reasonable security measures to protect your personal data storage.

We keep information for the duration of the time we provide services to you, and for a further seven years from the date you cease to be a client. This allows us to meet legal, statutory and regulatory obligations, and to be able to provide assistance during any third party investigation such as those carried out by HMRC etc. In all cases our need to use your personal information will be reassessed on a regular basis and information which is no longer required will be destroyed securely. Information that you give to us will not be used for marketing purposes. We will hold your personal data only for the purpose of our accounting and taxation services.

In accordance to provide the highest level of customer service possible, we need to keep accurate personal data about you. We take reasonable steps to ensure the accuracy of any personal data or

sensitive information we obtain. We ensure that the source of any personal data or sensitive information is clear and we carefully consider any challenges to the accuracy of the information. We also consider when it is necessary to update the information, such as name or address changes and you can help us by informing of these changes when they occur.

Sharing Information

We keep information about you confidential. We will only disclose your information with other third parties with your express consent with the exception of the following categories of third parties:

- Regulatory authorities and other fraud prevention agencies for the purpose of fraud prevention and to comply with any legal and regulatory issues and disclosures;
- Anyone to whom we may transfer our rights and duties under any agreement we have with you;
- Any legal or crime prevention agencies and/or to satisfy any regulatory request (including recognised practitioner bodies) if we have a duty to do so or if the law allows us to do so;
- Our external accounting and taxation software providers, in order to facilitate correct production of your payroll, accounts and or tax returns;
- Our Information Technology support provider; and
- Our continuity of service provider

We do not currently transfer your personal data outside the EEA. If in future we transfer your personal data, in accordance with the terms of this Policy outside of the EEA, we will make sure that the receiver agrees to provide the same or similar protection as we do and that they only use your personal data in accordance with our instructions.

Data Subject Rights

Subject access requests: The Data Protection Act 2018 grants you (the “data subject”) the right to access particular personal data that we hold about you. This is referred to as a subject of access request. We shall respond promptly and certainly within one month from receiving the request and the necessary details from you. Our formal response shall include details of the personal data we hold about you, including the following:

- Sources from which we acquired the information;
- The purpose for processing the information; and
- Persons or entities with which we are sharing the information with

Right to rectification: You, the data subject, shall have the right to obtain from us, without undue delay, the rectification of inaccurate personal data we hold concerning you. Taking into account the purposes of the processing, you shall have the right to have incomplete personal data completed, including the means of providing a supplementary statement.

Right to erasure: You shall have the right to obtain from us the erasure of inaccurate or irrelevant personal data concerning you without undue delay.

Right to restriction of processing: Subject to exemptions, you shall have the right to obtain from us restriction of processing where any of the following applies:

- The accuracy of the personal data is contested by you, and is restricted until the accuracy of the data has been verified;

- The processing is unlawful and you oppose the erasure of the personal data and instead request the restriction in its use;
- We no longer need the personal data for the purpose of processing, but it is required by you, for the establishment, exercise or defence of legal claims;
- You have objected to processing of your personal data pending the verification of whether there are legitimate grounds for us to override these objections

Notification obligations regarding rectification, erasure, or restriction of processing: We shall communicate any rectification or erasure of personal data or restriction of processing as described above to each individual of whom the personal data has been disclosed, unless this proves impossible to, or involves disproportionate effort. We shall provide you with information about those recipients if you request it.

Right to object: You shall have the right to object, on the grounds relating to your particular situation, at any time to the processing of personal data concerning you, including any personal profiling, unless this relates to processing that is necessary for the performance of a task carried out in the public interest or an exercise of official authority vested in us. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of you, or for the establishment, exercise or defence of legal claims.

We do not carry out any automated processing, which may lead to an automatic decision need on your personal rights.

Important Information

Questions and queries: If you have any questions or queries which are not answered by this policy, or have any potential concerns about how we may use the personal data we hold, please write to:

Data Protection Officer, HW Accountancy Ltd, 26 Cullerne Close, Surrey, KT17 1XY or email: info@hwaccount.com

Complaints: If you have a complaint regarding the use of your personal data or sensitive information then please contact us in the first instance at the above address and we will do our best to help you.

If your complaint is not resolved to your satisfaction and you wish to make a formal complaint to the Information Commissioner's Office (ICO), you can contact them on 0303 123 1113. You also have the right to judicial remedy against a legally binding decision of the ICO where you consider that your rights under this regulation have been infringed as a result of the processing of your personal data. You have the right to appoint a third party to lodge the complaint on your behalf and exercise your right to seek compensation. Policy changes: This policy may be regularly reviewed, this is to make sure we continue to meet the highest of standards and to protect your privacy. We reserve the right, at all times, to update, modify or amend this policy. We will not significantly change how we use information you have already given to us without your prior agreement.