

Client Privacy Notice

Paul C Jefferies MIAB Limited

Last updated: 2 January 2026

Paul C Jefferies MIAB Limited is committed to protecting the privacy and security of your personal data. This Privacy Notice explains how we collect, use, store and share personal data about clients and other individuals in the course of providing our professional services.

This privacy notice applies only to **personal data** (information relating to an identified or identifiable individual) processed by us as a **Controller**. Information about legal entities (e.g. limited companies), does not fall into this definition.

We may also process your personal data as a Processor, on behalf of a client (for example, where we are providing payroll bureau services to your employer). Where this is the case, you should refer to your employer's privacy notice.

1. Contact Details

Paul C Jefferies MIAB Limited

Registered in England and Wales, Company number: 10175747

Website: <https://paulcjefferies.co.uk/>

Email: paul.c.jefferies.miab.ltd@parse.capium.com

Telephone: 01782 413081

Registered address: 66 Harpfield Road, Stoke on Trent, Staffordshire ST4 5QT, United Kingdom.

We are the **controller** of the personal data described in this notice.

2. Data Collection

We may collect the following categories of personal data, depending on the service:

Data collected directly from you

- Name, title and contact details (address, email, telephone)
- Date of birth
- National Insurance number / Unique Tax Reference (UTR)
- Employment information (job title, role, company, etc.)
- Other identifiers (registration numbers, PAYE references, etc.)
- Payroll information (salary / income, pensions, student loans, benefits, tax code, etc.)
- Bank account details

- Financial records (income, expenses, invoices, receipts, etc.)
- Accounting and bookkeeping information
- Identity documents (passport, driving licence, etc.)
- Login details or access credentials you provide for accounting software
- Communications with us (emails, letters, direct messages, meeting notes, etc.)

Data collected from third parties

We may also receive personal data from:

- HM Revenue and Customs (HMRC)
- Companies House
- Your employer, pension provider or contractor (e.g. CIS data)
- Banks and financial institutions
- Accounting / bookkeeping software providers
- Previous accountants or advisers (with your authorisation)
- Publicly available sources (Companies House, online directories)

3. Purposes and Lawful Bases

Purpose of Processing	Example Activities	Lawful Basis
Providing accountancy, bookkeeping, payroll and tax services	Accounts preparation, VAT returns, payroll, company accounts, tax returns.	Article 6(1)(b) - performance of a contract
Business start-up support and general business advice	Company formation, tax planning support.	Article 6(1)(b) - performance of a contract
Meeting our legal obligations	Anti money laundering (AML), counter-terrorism financing (CTF) and know your customer (KYC) / Politically Exposed Persons (PEPs) and Sanctions checks and reporting, record-keeping, tax law compliance.	Article 6(1)(c) - legal obligation
Invoicing and financial administration	Processing payments, managing debt recovery.	Article 6(1)(f) - legitimate interests.

Maintaining practice management and accounting systems	Internal administration, software hosting.	Article 6(1)(f) – legitimate interests
Communications with you	Service updates, responding to enquiries.	Article 6(1)(f) – legitimate interests

Where we rely on **legitimate interests**, those interests are to operate and grow our professional accountancy practice, maintain accurate records, manage our relationship with clients, and ensure efficient service delivery.

If you do not provide the personal data necessary for us to deliver our services, we may be unable to perform the contract and may need to cease acting for you (disengage services).

Special Category Data

We do not routinely process special category data. If such data is included in your financial documents (e.g. union membership on payslips, sickness absence information), where we are processing them to provide advice or services directly to you, this data will generally be processed under **Article 6(1)(b)** (performance of a contract), and **Article 9(2)(b)** (employment, social security and social protection law).

Part of our Know Your Customer (KYC) checks involves screening against a Politically Exposed Persons (PEPs) and Sanctions register. If you are deemed a PEP, this may reveal information relating to your political opinions. We carry out these checks under **Article 6(1)(c) (legal obligation)** and **Article 9(1)(g)** (substantial public interest). We rely on **Schedule 1(2)(10)** (preventing or detecting unlawful acts) of the Data Protection Act 2018.

4. Data Sharing

We may share your personal data with:

- **HMRC** (for tax submissions)
- **Companies House** (for company filings)
- **Pension providers** (for payroll and auto-enrolment)
- **Payroll and accounting software providers** (e.g. Capium, Sage, etc.)
- **IT, hosting and cloud service providers** (for secure storage)
- **Customer screening providers** (for AML / CTF / KYC checks)
- **Regulators, law enforcement and government bodies**
- **Professional registration bodies / supervisors**
- **Banks or financial institutions**

- **Professional advisers** - legal, insurance, or audit firms
- **Previous or successor accountants** (with your authorisation)

We will **never** sell your personal data.

5. International Transfers

We are based solely in the UK. However, some of our technology suppliers may store data outside the UK.

Where this occurs, we ensure that appropriate safeguards are in place, such as:

- UK-approved adequacy regulations
- International Data Transfer Agreements (IDTAs)
- Addendums to the EU Standard Contractual Clauses

You may contact us for more information on specific transfer safeguards.

6. Data Retention

We keep personal data for no longer than necessary. In most cases, this means:

- **7 years** after the end of the relevant tax year (to comply with HMRC requirements), or
- **7 years** after the end of our engagement.

In some cases, personal data may be retained for longer periods (for example, where required by law).

7. Your Rights

You have the following rights:

- **Request access** to your personal data (commonly known as a data subject access request). This enables you to receive a copy of the information we hold about you.
- **Request the restriction** of processing of your personal data. This enables you to ask us to suspend the processing of information about you.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

- **Request the transfer** of your personal data to another party.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or the legitimate interests of a third party).

You are also entitled to make a complaint to the Information Commissioner's Office (ICO), which is the relevant data protection regulator in the UK. You can do so via their website at <https://ico.org.uk/make-a-complaint/>, or via their helpline at 0303 123 1113. However, before making a complaint, they do expect you to have attempted to [resolve the issue with us directly](#).

8. Regulatory Reporting and Compliance

As an accountancy service provider, we are legally required under UK anti-money laundering legislation to carry out customer due diligence checks (such as verifying identity, assessing risk, and monitoring for suspicious activity). This may involve processing identification documents, ownership information, and screening results.

Please be aware that we may be required to share relevant information with regulators (e.g. HMRC) or law enforcement agencies (e.g. the National Crime Agency) **without notifying you**, where doing so would constitute “tipping off”.