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## Privacy Policy

### Equidi-T Limited

**Last Updated:** 10 June 2025

At Equidi-T Limited, we are committed to protecting the privacy and security of your personal data. This Privacy Policy explains how we collect, use, store, and share your personal information when you visit our website, enquire about our services, or interact with us.

We are registered in England and Wales under company number [Your Company Number]. Our registered office is at [Your Registered Address].

For the purposes of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, Equidi-T Limited is the 'data controller' of the personal data we process.

### 1. What Personal Data Do We Collect?

We may collect and process various types of personal data about you, depending on your interaction with us:

- **Identity Data:** Name, title, date of birth, gender.
- **Contact Data:** Business address, personal address (if provided for correspondence), email address, telephone numbers.
- **Professional Data:** Company name, company registration number, Unique Taxpayer Reference (UTR), National Insurance Number (NIN), details of your business structure, industry, and number of employees.
- **Enquiry Data:** Details you provide when contacting us through our website forms or directly via email/phone regarding our services.
- **Usage Data:** Information about how you use our website, such as pages visited, time spent on pages, and referring websites.
- **Technical Data:** Internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Marketing and Communications Data:** Your preferences in receiving marketing from us and your communication preferences.
- **[Crucially, if you collect it directly, mention financial documentation you would eventually collect for accounting services (e.g., bank statements, invoices, receipts, payroll data, previous tax returns, etc.). You might state: "Once you become a client, we will collect detailed financial and business-related data necessary for the provision of our accounting services, as outlined in our engagement letter."]**

**We do not collect or store any payment card details directly on our website or servers as we do not process online payments.**

## **2. How Do We Collect Your Personal Data?**

We use different methods to collect data from and about you, including through:

- **Direct interactions:** You may give us your Identity, Contact, and Professional Data by filling in forms on our website (e.g., contact forms, enquiry forms) or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:
  - Enquire about our services.
  - Subscribe to our newsletter or other publications.
  - Give us feedback or contact us.
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- **Automated technologies or interactions:** As you interact with our website, we will automatically collect Technical Data and Usage Data about your equipment, Browse actions, and patterns. We collect this personal data by using cookies, server logs, and other similar technologies. Please see our separate Cookie Policy [Link to your Cookie Policy, if separate, otherwise integrate it here] for more details.
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from analytics providers such as Google Analytics.
  - Identity and Contact Data from publicly available sources such as Companies House or other professional networking platforms.
  - [Add any other specific third-party sources relevant to your initial interactions, e.g., if you use lead generation services, or referral partners.]

## **3. How and Why Do We Use Your Personal Data (Lawful Basis)?**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **To respond to your enquiries and provide information about our services.** This means processing your data to take steps at your request before entering into a contract with you.
- **Where it is necessary for our legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests. This allows us to respond to your enquiries efficiently, improve our website, and ensure our services are marketed effectively and securely.
- **Where we need to comply with a legal obligation.** This means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

- **Where you have given your consent.** We will obtain your consent before sending direct marketing communications via email or text message if we are not relying on legitimate interest.

Here's a breakdown of how we use your personal data and the lawful bases we rely on:

| Purpose/Activity | Type of Data | Lawful Basis for Processing

#### 4. Sharing Your Personal Data

We will not share or sell your personal data to any third parties for marketing purposes. However, we may share your personal data with the following categories of third parties for the purposes set out in section 3:

- **Service providers:** We use third-party service providers to help us operate our website and business (e.g., website hosting, email service providers, IT support, analytics providers). These providers are only allowed to process your personal data in accordance with our instructions and applicable data protection laws.
- **Professional advisors:** We may share your personal data with professional advisors such as lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance, or accounting services.
- **Regulatory and law enforcement bodies:** We may disclose your personal data to regulatory authorities, government bodies, and law enforcement agencies where we are legally required to do so, or to protect our rights, property, or safety, or the rights, property, or safety of others.
- **Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.** Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### 5. International Transfers

Some of our third-party service providers may be located outside of the UK and the European Economic Area (EEA). Whenever we transfer your personal data out of the UK/EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission or the UK government.

- Where we use certain service providers, we may use specific contracts approved for use in the UK/EEA which give personal data the same protection it has in the UK/EEA (e.g., standard contractual clauses).
- Where providers are based in the US, we may transfer data to them if they are part of a framework that ensures adequate protection of personal data (e.g., the EU-US Data Privacy Framework, if applicable and approved for UK transfers).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK/EEA.

## **6. Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **7. Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

For example, by law we have to keep basic information about our clients (including Contact, Identity, Financial, and Transaction Data) for six years plus the current year after they cease being clients for tax purposes.

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **8. Your Legal Rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully, or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at [Your Email Address] or [Your Phone Number].

**No fee usually required:** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is

clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

**What we may need from you:** We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond:** We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **9. Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

## **10. Third-Party Links**

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## **11. Changes to This Privacy Policy**

We keep our Privacy Policy under regular review. This version was last updated on the date stated at the top of this policy. Any changes will be posted on this page. We may also notify you of significant changes via email or other direct communication.

## **12. Contact Us**

If you have any questions about this Privacy Policy or our privacy practices, please contact us in the following ways:

**Full name of legal entity:** Equidi-T Limited **Email address:** [Your Business Email Address]  
**Postal address:** [Your Business Postal Address] **Telephone number:** [Your Business Phone Number]