

1 – Data protection principles

The company will process your personal data in accordance with the six personal data protection principles, which set out that all personal data shall be:

- Processed lawfully, fairly, and transparently;
- Collected and processed for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Adequate, relevant, and limited to what is necessary in relation to the purposes for which processed;
- Accurate and up to date and any inaccurate data rectified or erased without undue delay;
- With regards to the reasons for processing, not kept for longer than is necessary; and
- Processed in a way that ensures appropriate security

2 – Lawful processing

In line with data protection principles, we will only process your personal data and special category data for the reasons notified to you and in accordance with our obligations. Under the DPA, we must specify a lawful basis for processing your personal data.

The company processes personal data where necessary to manage contracts and client relationships, and the main lawful bases for processing your personal data are:

- To comply with our legal obligations (e.g., run Anti-Money Laundering checks);
- To perform your contract with us (e.g., prepare and file your tax return), and;
- Because it is necessary for our legitimate interests (e.g., to ensure that we can succession plan);

Where one of these reasons applies, we may process your personal data without your consent. You may choose not to give us certain personal data but you should be aware this may prevent us complying with our legal obligations and this may in turn affect your client contract agreement.

Where we process data, we will only do so where one of the lawful reasons set out above applies and where either: you have given your explicit consent; processing is necessary to protect you or another person's vital interests and you are incapable of giving consent; you have made the personal data public; processing is necessary to do with a legal claim; it is necessary for occupational medical reasons, or for the assessment of your working capacity.

3 – Where your personal data is handled by a third party

Where your personal data is transferred to a third party (for example our printing provider), the company still retains responsibility for the secure and appropriate use of that personal data. Consequently, before your personal data is transferred to any third party, the company will:

- Ensure the third party understands their legal obligation with regards to ensuring they have sufficient security measures in place to protect the processing of personal data;
- Have in place a written contract establishing what personal data will be processed and for that purpose;

4 – Your right as a ‘data subject’

- Have the right to be told what personal data the company processes, how this processing takes place and on what basis;
- Have the right to see your own personal data by making a subject access request (see below)
- Have the right to receive a copy of your personal data and in some circumstances have your personal data transferred to another data controller, usually within a month, and without any charge (a reasonable fee may be assessed for excessive and repetitive requests);
- Can correct any inaccuracies in your personal data where it is no longer necessary to process it for the purpose it was collected or where it should not have been collected in the first place;
- May object to personal data processing where the company is relying on a legitimate interest to do so and you think your rights and interests outweigh ours;
- Will be notified if there is a data security breach involving your personal data that may affect you;
- Have the right not to consent, or to later withdraw your consent to processing where we were relying on consent as the lawful reason to process personal data;
- Have the right to complain to the Information Commissioner. Contact details can be found on their website www.ico.org.uk;

5 – Subject access requests

All existing and potential clients have the right to review the personal data that the company holds about them, with some exceptions. If you wish to make a ‘subject access request’ you should write to the company

The company will usually respond within one month. If your request is complex the timescale for a response may be extended by up to two months. Where this is the case, we will advise you of this within one month of receiving your request and explain why we need more time.

No charge will usually be made for a response to a subject access request.

6 – Privacy notices

Whenever we (i) collect personal data from you, (ii) are provided with personal data about you, or (iii) are planning to pass your personal data to a third party, we will provide you with a privacy notice giving clear information about how and why your personal data is being used, where it comes from and where it is going.

This section gives an overview of the personal data we usually collect and use about you in the course of your relationship with us. As your supplier of services, we need to process your personal data during your contract with us, and/or following the termination of contract of services with us.

We will use this personal data to decide whether to enter a contract with you, check you have the right to work in the UK, decide what fees and other terms to offer you and to administer the ongoing contract between us. This includes but is not restricted to, for example, making reasonable adjustments if you have a disability, filing and submitting your personal tax return, receiving payments from you. Personal data can include but is not restricted to:

- Your name and date of birth;
- Your address, telephone number and personal email address;
- Your identification documents and information about your immigration status;
- Your national insurance number and details of your tax status;
- Your Government Gateway number & UTR Number
- Information about your employment history;

- Information regarding the access or source of funds
- Your job title and place of work;
- Information about your contract with us including your start date, working hours and fees and benefits information;
- Your gender, marital status and details of any dependents;
- Contact details for your emergency contact/next of kin;
- Your driving license number;
- A copy of your private health questionnaire if you are eligible for private health care;
- Information about your performance including appraisal records;
- Details of any training received;
- Images of you from our on-site CCTV systems;
- Records of any correspondence between you and the company about your contract including, for example, letters confirming any changes to your contract.

The personal data will be retained by the company for five years after you have left the company or following the termination of a contract between us, and payroll records for five complete financial tax years.