



Privacy Policy

Protecting your personal information is important to The Accounting Centre, especially as our clients entrust us with a lot of information about themselves.

This is a copy of our privacy policy, which explains how we collect and process your personal information, as well as inform you of your privacy rights. This policy complies with the EU's General Data Protection Regulation (GDPR) which comes into effect on 25th May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed of any changes to your personal information during your relationship with us.

Please take a few minutes to read this privacy policy. It is important that you are fully aware of how and why we are using your data. This version was last updated on **11/05/2018**. We will inform you of any future changes made to our privacy policy on our website www.accounting-centre.co.uk

If you have any queries, complaints or requests to exercise your legal rights, please contact our Data Protection Officer, Tejas Somaiya. You have the right to make a complaint about us to the Information Commissioner's Office (ICO). The ICO is the UK supervisory authority for data protection issues. www.ico.org.uk We would however, appreciate the chance to deal with your concerns before you approach the ICO.

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Who are we?

The Accounting Centre Limited (Company Number 4692731) is both a data controller and data processor in relation to the processing of personal information that you provide to us when you use our services.

Our registered office is The Accounting Centre, First Floor, 736 High Road, North Finchley, London, N12 9QD.

Glossary of Terms

What is personal information?

Personal information is defined as any information that can be used to identify a person. This can be a name, identification number, address, IP address, email address, payroll and accounting data, for example.

What is sensitive personal data?

Sensitive personal information is special categories of personal data such as medical conditions, genetic data and biometric data.

What is a data controller?

A data controller determines the purposes and means of processing personal data.

What is a data processor?

A data processor is responsible for processing personal data on behalf of a controller.

Data Subject

A data subject is a natural person.

Processing

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third Party

Third party means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under direct authority of the controller or processor, are authorised to process personal data.

What information do we hold?

We may collect and process the following information about you:

Type of Data	Description	Examples of how we use it
Identity Data	<ul style="list-style-type: none"> • First Name • Last Name • Staff Identifier 	<ul style="list-style-type: none"> • Providing our service to you • Enhancing our product and service offering
Contact Data	Contact information such as: <ul style="list-style-type: none"> • Home address • Business address • Email address • Telephone number 	<ul style="list-style-type: none"> • Providing our service to you • Enhancing our product and service offering
Personal Details	<ul style="list-style-type: none"> • Date of birth • Bank Details • Financial Details • Next of kin • Family, lifestyle and social circumstances e.g. the number of dependents 	<ul style="list-style-type: none"> • Providing our service to you
Professional Data	Information we may collect in the course of providing our service to you: <ul style="list-style-type: none"> • Salary rate/ scale/ annual salary • Pension provider • Details of income • Employment details 	<ul style="list-style-type: none"> • Providing our service to you
Open data and Public Records	<ul style="list-style-type: none"> • Electoral register • Companies House • Other information that is openly available on the internet 	<ul style="list-style-type: none"> • Providing our service to you
Documentary Data and National Identifiers	Details about you stored in documents such as: <ul style="list-style-type: none"> • Your Passport • Driving Licence • Birth Certificate • National Insurance number 	<ul style="list-style-type: none"> • Prevent financial crime • Verification of identity/fraud prevention

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide the data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

Where do we get our information from?

We receive information directly from you when you fill in forms or contact us by phone, email, post, etc.

Information we collect about you or receive from other sources: This could be information you provide to us electronically (through an online portal, for example), information from a third party or from publicly available sources such as the electoral register and Companies House. We may also receive information from third parties nominated by yourselves (IFA's and banks).

How do we use your information?

We use personal information we hold about you:

- To carry out responsibilities resulting from any agreements you've entered into with us and to provide you with the information, products and services that you've asked of us (as defined in our Letter of Engagement and supporting Schedules).
- To tell you about changes to our services or products.
- To comply with any applicable legal or regulatory requirements, including "know your client" checks or to comply with any applicable regulatory reporting or disclosure requirements.
- For any other purposes that we've agreed with you from time to time.

When you apply for a product or to receive a service from us, the application forms you fill out or the resulting contract may contain additional clauses relating to the way we use and process your personal information. These will apply in addition to the above uses.

We do not use any form of automated decision making in our business.

Using your information in accordance with data protection laws

Data Protection Laws require us to meet certain conditions before we're allowed to use your personal information in the way we describe in this privacy policy. We take these responsibilities extremely seriously.

When processing personal data, the reason for processing must fall into one of these legal basis's:

1. The person gave explicit consent
2. To fulfil or prepare a contract
3. A legal obligation (excluding a contract)
4. To save someone's life or in a medical situation
5. To carry out a public function
6. Some other legitimate reason

How long do we keep your information for?

We will keep your personal information in accordance with our internal data retention policies. We'll determine the length of time we keep it based on the minimum retention periods required by law or regulation. We'll only keep your personal data after this period if there is a legitimate and provable business reason to do so. If you would like further information on our Data Retention Policy please contact our Data Protection Officer Tejas Somaiya.

Who do we share your personal information with?

We will only disclose your personal information to:

- Third-party suppliers, contractors and service providers for the purposes listed under the 'How do we use your information?' section above
- Our regulators, government (e.g. HMRC) and law enforcement or fraud prevention agencies
- Third Parties when we have your explicit consent in writing

We will not share your information with third parties for marketing purposes.

Fraud Prevention

The Accounting Centre may check your details with fraud prevention agencies. If false or inaccurate information is provided and fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. We may also share information about you with other organisations and public bodies, including the police, and we may check and/or file your details with fraud prevention agencies and databases.

The Accounting Centre and other organisations may access and use this information to prevent fraud and money laundering and terrorist financing. The Accounting Centre may also check the details of other parties related to your contract, including verification of identity.

Keeping your data secure

We take all reasonable and necessary steps to make sure that your data is treated securely and in accordance with this privacy policy. We have in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We limit access to your personal data to those employees, contractors and other third parties who need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Unfortunately sending information electronically is not completely secure. Anything you send is done so at your own risk. We will implement a password protected facility or a company dropbox to minimise the risk when sending personal information. Where we have given (or where you have chosen) a password, you are responsible for keeping this password confidential. We ask you not to share your password with anyone and to use strong passwords. Once data is received, we will secure your information in accordance with our security procedures and controls.

There is also an inherent risk involved when sending personal information through the post. Anything you send is done so at your own risk. We suggest that you use an encrypted form of online communication when sending information to us, whenever possible.

We have procedures in place 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. If you think that any part of our process is not secure, please contact our Data Protection Officer Tejas Somaiya.

Transferring your data outside the EU

The data that we collect from you will largely not be transferred to or stored at a destination outside the European Economic Area. Some of our third-party suppliers may be located outside the EU. Where this is the case we will take steps to make sure the right security measures are taken so that your privacy rights continue to be protected as outlined in this policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU to give you those services.

Your Rights

You have rights under data protection law that relate to the way we process your personal data. If you wish to exercise any of these rights, please get in touch with our Data Protection Officer (contact details can be found at the end of this policy).

These are:

- The **right to access your personal information** that we hold about you.
- The **right to make us correct any inaccurate personal data** we hold about you.
- The **right to make us erase any personal data** we hold about you. This right will only apply where, for example:
 - We no longer need to use the personal data to achieve the purpose we collected it for.
 - You withdraw your consent if we're using your personal data based on that consent.
 - Where you object to the way we use your data, and there is no overriding legitimate interest.
- The **right to restrict our processing of the personal data** we hold about you. This right will only apply where for example:
 - You dispute the accuracy of the personal data we hold.
 - You would like your data erased, but we require to hold it in order to stop its processing.
 - You have the right to require us to erase the personal data but would prefer that our processing is restricted instead.
 - Where we no longer need to use the personal data to achieve the purpose we collected it for, but you need the data for legal claims.
- The **right to object to our processing of personal data** we hold about you, including for the purposes of sending marketing materials about you.
- The right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the **right to make us transfer this personal data** to another organisation- Data Portability.
- The **right to withdraw consent**, where we're relying on it to use your personal data, for example, to provide you with marketing information about our services or products.

More information on these rights can be found on the Information Commissioner's website. www.ico.org.uk

Contacts and Complaints

If you have any questions about this privacy policy, a complaint or wish to exercise any of your rights please get in touch with our Data Protection Officer at tejas@accounting-centre.co.uk using one of the following subject lines:

- Data Protection: Query
- Data Protection: Complaint
- Data Protection: Correction
- Data Protection: Subject Access Request
 - Your right to request a copy of the information we hold about you.
- Data Protection: Right to be Forgotten
- Data Protection: Data Portability
 - Your right to move, copy or transfer personal data.
- Data Protection: Withdrawal of Consent

If you have any concerns about the way we process your personal data or are not happy with the way we have handled a request made by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office (ICO).

www.ico.org.uk

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
England
SK9 5AF

0303 123 1113

Data Protection Officer (DPO)

The Accounting Centre has appointed a Data Protection Officer to answer your queries regarding Data Protection and to monitor our compliance with data protection laws:

Tejas Somaiya

tejas@accounting-centre.co.uk

The Accounting Centre
First Floor
736 High Road
North Finchley
London
N12 9QD

Changes to our Privacy Policy

We keep our Privacy Policy under regular review. This version of the Privacy Policy was last updated on **11/05/2018** in line with new GDPR guidelines. You will be made aware of any changes we make to our Privacy Policy in the future.