

t: 01905 754950

e : info@smart-accountancy.co.uk

w: www.smart-accountancy.co.uk

a : 3 Taylors Lane Worcester WR1 1PN

### Privacy Policy Smart Accountancy Solutions Limited

# Completed and updated 11 January 2023

#### Our contact details:

E-mail: info@smart-accountancy.co.uk Address: 26 Sansome Walk, Worcester, WR1 1LX Phone Number: 01905 754950

#### The type of personal information we collect:

We currently collect and process the following information:

- Personal identifiers, contacts, and characteristics. It may include (but is not limited to):
  - Your name and your contact information
  - National Insurance Numbers
  - Employment information
  - o Financial information such as credit history
  - Specific data relevant to the service we provide you with, such as personal tax information or payroll and accounting data.
  - Information about any complaints and enquiries you make to us.
  - Information from research, surveys, and marketing activities

### How we obtain personal information and why we have it?

#### Most of the personal information we process is provided to us directly by you.

We may process your personal data for purposes necessary for the performance of our contract with you, your employer, our clients and to comply with our legal obligations such as anti-money laundering legislation. This may include processing your personal data where you are an employee, subcontractor, supplier or customer of our client.

We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.

We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

### Cookies

Our website uses cookies, which are tiny files that are downloaded to your computer with your permission and used to improve your experience and help the site work more efficiently.

For further information on our cookie policy or advice on how to control cookies through your browser setting, please refer to the policy on our website.

They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website.

### Information about connected individuals.

We may need to gather personal information about your close family members and dependents in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. Please make them aware of this privacy notice.

# Information collected at our premises.

We collect information about visitors to our premises which may include your name, the date and time of your visit, who you are visiting, your employer, contact details and vehicle registration number. If you have an accident at our premises, we may also record details of your accident.

We, or our landlords, may operate CCTV at our premises which may record you and your activities. Notices are displayed indicating which areas are subject to surveillance.

### How we use your information and for what purpose?

We use the information that you have given us to:

- carry out our obligations arising from any agreements entered into between you, your employer, our clients and us (which will most usually be for the provision of our services);
- carry out our obligations arising from any agreements entered into between our clients and us (which will most usually be for the provision of our services) where you may be a subcontractor, supplier or customer of our client.
- seek your thoughts and opinions on the services we provide (such as our client survey)
- provide information to you that you request from us relating to our products, services and events.
- provide information to you relating to other products that may be of interest to you. See marketing below.
- notify you about any changes to our services.
- administer your visit to our offices (including car parking) ensuring your safety and our office security.

In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.



'Third parties' includes third-party providers and other entities that we work with such as The Book Keepers (Pershore) Limited and product and platform providers that we use to arrange financial products or services for you.

The following activities are carried out by third-party providers:

- IT and cloud services,
- professional advisory or accounting and tax services,
- administration services,
- marketing services,
- banking services.

We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

We may provide you with access to various third-party cloud software. The providers of the cloud software will have their own privacy notices explaining why and how personal data is collected and processed by the cloud software. We encourage individuals using this cloud software to refer directly to these privacy notices.

If you require further information on providers who we share data with, please contact info@smart-accountancy.co.uk.

We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with the law.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

#### (a) Your consent. You can remove your consent at any time. You can do this by contacting info@smartaccountancy.co.uk

- (b) We have a contractual obligation.
- (c) We have a legal obligation.
- (d) We have a vital interest.
- (e) We need it to perform a public task.
- (f) We have a legitimate interest.

### How we store your personal information

Your information is securely stored.

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration the requirements of our business and the services provided, any statutory or legal obligations and the purposes for which we originally collected the personal data.



# **Contracted Services**

We will hold your data for 7 years in line with our regulatory requirements.

# Marketing

We will hold your data for a period of 6 years with a review every 2 years. You will have the opportunity to opt out or update or delete data at any point should you need to do so and details are set out in this policy as to how to do that.

#### Recruitment

If you are successful in your application, your information will be used and kept in accordance with our internal privacy policy and documents storage, retention and exchange policy held on our Intranet, which you will have access to.

If you are not successful in your application, your information will be held for up to 12 months after the relevant round of recruitment has finished, at which stage it will be removed, unless you re-apply when given the option to do so. (You will be sent an email giving you this option).

To manually opt out at any time, you can also email info@smart-accountancy.co.uk

### **Visitor information**

This information is kept for a period of up to 2mths. If you have an accident on our premises, accident records are retained for the statutory period following the incident.

Where in operation, CCTV recordings will be kept for a period of time as designated by landlords, further information (where applicable) can be found displayed in communal areas of our offices.

#### Where we store your information

For the purposes of providing our services to you, we may transfer your personal data to a country or territory outside the UK and the EU. We will only do this when appropriate, for example when we work with foreign professionals on your behalf to provide you with certain services, or where we provide the data at your request. Where this is the case, we will do so in accordance with data protection legislation and take all steps reasonably necessary to ensure that your personal data is kept secure.

Some countries or organisations outside of the UK and the EU where we may transfer your information will have an "adequacy decision" in place, meaning the EU considers them to have an adequate data protection regime in place.

If we transfer data to countries or organisations outside of the UK and the EU which the EU does not consider having an adequate data protection regime in place, we will ensure that appropriate safeguards (for example, model clauses approved by the EU or a data protection authority) are put in place where required.

To obtain more details of these safeguards, please contact info@smart-accountancy.co.uk

### Security precautions in place for data collected.

We have put in place commercially reasonable and appropriate security controls and 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 data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.



# Profiling

We may use your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of extra information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and cut fraud and credit risk.

# Marketing

We would like to send you information about our services which may be of interest to you. We strive to provide you with choices regarding certain personal data uses, particularly around marketing.

You have a right at any time to stop us from contacting you for marketing purposes. If you have received marketing communications by email from us, those communications will contain an unsubscribe link to change your marketing preferences or unsubscribe from marketing communications altogether.

To manually opt out you can also email info@smart-accountancy.co.uk.

### **Recruitment and Employment**

We will collect and hold information on job applicants, including information you provide to us in your application, or provided to us by recruitment agencies, as well as information on you from any referees you provide.

We use this as necessary to enter into an employment contract with you, and for our legitimate interests in evaluating candidates and recording our recruitment activities, and as necessary to exercise and perform our employment law obligations and rights.

You must provide certain information (such as your name, contact details, professional and educational history) for us to consider your application fully. If you have not provided all of this information, we may contact you to ask for it. If you do not wish to provide this information, we may not be able to properly consider your application.

If you are listed as a referee by an applicant, we will hold your name, contact details, professional information about you (such as your employer and job title) and details of your relationship with the applicant. We will use this information as necessary for our legitimate interests in evaluating candidates and as necessary to exercise and perform our employment law obligations and rights. Your information will be kept alongside the applicant's information.

If you are listed by someone who works for us, as an emergency contact or a beneficiary under our pension or other similar schemes, we will hold your name, contact details and details of your relationship with that worker. We will use this to contact you as necessary to carry out our obligations under employment law, to protect the vital interests of that worker, and for our legitimate interests in administering our relationship with that worker. Your information will be kept until it is updated by that worker, or we no longer need to contact that worker after they have stopped working for us.

### **Other websites**

On occasion we may include links to third parties on our website <u>www.smart-accountancy.co.uk</u> Where we provide a link, it does not mean that we endorse or approve that site's policy towards visitor privacy. You should review their privacy policy before sending them any personal data.

This privacy notice only extends to Smart Accountancy Solutions Limited.



# Your duty to inform us of changes.

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting your relationship contact or by emailing info@smart-accountancy.co.uk

# Your data protection rights.

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.
Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

If you want to exercise any of the above rights, please contact the Privacy Officer, Smart Accountancy Solutions Limited, 26 Sansome Walk, Worcester, WR1 1LX, or email: info@smart-accountancy.co.uk

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 for the administrative costs of complying with the request if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

# Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, please email <u>info@smart-accountancy.co.uk</u> Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.



#### **Changing our Privacy Notice**

This current privacy notice has been updated on 11 January 2023

Our privacy notice may need to change from time to time, so we will continue to review this notice and will display any changes on our website.

#### How to contact us

If you have any questions about our privacy notice or information we hold about you, please feel free to contact us in the first instance at:

Email: info@smart-accountancy.co.uk

Tel: 01905 754950

#### How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at: Email: info@smart-accountancy.co.uk

Tel: 01905 754950 You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113 ICO website: <u>https://www.ico.org.uk</u>

