

TONY LARNER CHARTERED CERTIFIED ACCOUNTANTS**PRIVACY NOTICE**

This privacy notice explains how we use any information we collect and hold regarding your personal and business affairs.

How do we collect information about you?

We obtain information about you when:

- you engage us for professional services,
- you enquire about a potential engagement with us,
- we are engaged to act as a data processor on behalf of a data controller (for example, when we carry out our payroll services on behalf of an employer),
- you provide us with your personal details to apply for a position within the firm, or when you contact us via our website or communicate by email or letter.

The information collected will generally be obtained directly from you or from a third party which you have provided authority to as your agent. If we are acting as a data processor, the information may be passed to us via the data controller.

What type of information do we collect about you?

For our professional services, the information collected may relate to your personal, business or financial circumstances, for us to provide the service that we have been engaged to undertake. For example, we may record your name, address, telephone number, email address, date of birth, unique tax reference, national insurance number, bank account details, data in relation to your personal taxation circumstances, data regarding your business activities or company, etc.

This could be a service for which either you or a third party have engaged us. For example, we may need to obtain personal data when we are acting as a data processor on behalf of a data controller (such as when we have been engaged to undertake payroll services for an employer or bookkeeping services for a client).

For job applications, this information may include your personal contact details, date of birth, education and skills, previous employment details, interests, ethnic origin, medical conditions, marital status, and CV.

Why do we need to collect and use your data?

Our primary lawful basis for processing data is for the performance of our contracts with our clients and staff. This includes the processing of personal data when we are engaged by a data controller to provide our services as a data processor.

The information that we collect is essential for us to be able to carry out the agreed contract effectively. Without collecting personal data we would be unable to fulfil our legal and regulatory obligations.

How will we use the information about you?

In general terms, and depending on which services we are engaged to deliver we may use your information to:

Undertake our business services (including those that we provide as a data processor);

- verify your identity where this is required,
- maintain our records in accordance with applicable legal, regulatory and corporate governance obligations and good practice, ensuring our business policies are adhered to,
- prevent and detect crime, fraud or corruption,
- complete our agreed services (such as completion of your personal tax return or business accounts), along with assisting in the gathering of information as part of investigations by regulatory bodies or in connection with legal proceedings or requests,
- for operational reasons, such as recording transactions, training and quality control,

TONY LARNER CHARTERED CERTIFIED ACCOUNTANTS**PRIVACY NOTICE continued:-**

For our applicants and staff:

- consider you for a position within the firm,
- maintain our records in accordance with applicable legal, regulatory and corporate governance obligations and good practice, ensuring our business policies are adhered to,
- report regulatory statistics such as diversity and gender pay gap information.

Who might we share your information with?

If you are our client, in order to deliver our services to you effectively we may occasionally allow approved and regulated third parties access to our computer systems for maintenance and upgrade, also to maintain our computer software and programmes.

On occasion we engage, with your consent, other professional advisors for assistance with your affairs and this will involve access to your data.

In order to maintain our professional standards our records and systems are occasionally subject to review by the Association of Chartered Certified Accountants.

Where third parties are involved in processing or accessing your data, we only disclose the personal information that is necessary to deliver the service. We have a contract in place with third parties to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in accessing your data and that they will only act in accordance with our instructions.

Where it is necessary for your personal data to be forwarded to a third party we will use appropriate security measures to protect your personal data in transit.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime we may send your details to third party agencies for identity verification purposes.

Any staff with access to your information have a duty of confidentiality under the ethical standards that this firm is required to follow.

If you are a member of staff, if there is a need to complete security vetting checks (such as DBS/CRB checks) in relation to work, we may need to pass your information on to the relevant third party for review. This is the only occasion when a third party processor is used in relation to staff personal data.

How long do we keep hold of your information?

In principle, your personal and business data should not be held for longer than is required under the terms of our contract for services with you. However, we are subject to regulatory requirements to retain data for specified minimum periods. We also reserve the right to retain data for longer than this where we consider it is in your interest for us to do so.

With regards to client data (and data which we obtain whilst acting as a data processor on behalf of a data controller), we will retain your personal data for a minimum of seven years.

For human resources purposes, where you have applied for a position within the firm, we will retain your application for a maximum of one year from the closure of the vacancy unless you were successful (in which case, this record will then move to your staff file). For staff, we will retain your personal data for a minimum of six years after your employment ceases.

Security precautions in place to protect the loss, misuse or alteration of your information.

Whilst we strive to protect your personal and business information, we cannot guarantee the security of any information you transmit to us, particularly by email, and you do so at your own risk.

TONY LARNER CHARTERED CERTIFIED ACCOUNTANTS**PRIVACY NOTICE continued:-**

Your data will usually be processed in our office in Sheringham and is stored locally and within United Kingdom based data centres. We take the security of your data seriously and so all our systems have appropriate security in place that complies with all applicable legislative and regulatory requirements.

Your rights***Access to your information***

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal or business information, please contact us.

Correcting your information

We want to make sure that your information is accurate, complete and up-to-date and you may ask us to correct any personal details about you or your business that you believe does not meet these standards.

Deletion of your information

You have the right to request deletion of your data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

Restricting how we may use your information

In some cases, you may ask us to restrict how we use your information. This right might apply, for example, where we are checking the accuracy of the information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where there is no longer a basis for using your personal information but you do not want us to delete the data. Where this right is validly exercised, we may only use public interest grounds to do so.

Objecting to how we may use your information

If you object to this use and ask us to, we will stop using that information unless there are overriding legitimate grounds to continue.

Please contact us in any of the ways set out in the "Contact information" section below if you wish to exercise any of these rights.

Changes to our privacy notice

We keep this privacy notice under regular review and will place any updates on our website. Paper copies of the privacy notice may also be obtained from our office on request.

This privacy notice was prepared on 16 May 2018.

Contact information

If you have any questions about our privacy notice or information we hold about you please contact us at our Sheringham office, 23 Station Road, Sheringham, Norfolk NR26 8RF (Office telephone: 01263 821263).

Complaints

We seek to resolve directly all complaints about how we handle your personal or business information but you also have the right to lodge a complaint with the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire OKG 5AF

