

## **PRIVACY POLICY**

### **"SCOPE"**

This policy applies to Adderley, Hill & Co, which is a trading name of Adderley, Hill & Co Limited (Company number 07714717 registered in England and Wales).

Please read the following information carefully to understand our views and controls in relation to your personal information and how we treat it. For the purpose of the General Data Protection Regulation (EU) 2016/679, the data controller is Adderley, Hill & Co.

Adderley, Hill & Co takes the protection of your privacy very seriously. We are committed to protecting and respecting your privacy. We only use your personal information in order to provide you with the services you have requested from us, and to meet our legal obligations.

### **HOW DO WE COLLECT INFORMATION?**

We obtain information about you when you engage us to deliver our services (as defined in our Letter of Engagement and supporting schedules) as well as other purposes such as carrying out credit checks, crime prevention and statutory returns.

### **WHAT INFORMATION DO WE COLLECT?**

The personal information we collect from you varies dependant upon which services you engage us to deliver. The personal information we collect might include your name, address, telephone number, email address, your Unique Tax Reference (UTR) number, your National Insurance number, copies of ID documents and bank details.

### **USE OF YOUR INFORMATION**

In general terms, and depending on which services you engage us to deliver, as part of providing our agreed services we may use your information to:

- Contact you by post, email or telephone
- Verify your identity where this is required
- Understand your needs and how they may be met
- Maintain our records in accordance with applicable legal and regulatory obligations
- Process financial transactions
- Prevent and detect crime, fraud or corruption

For For Business to Business Clients and Contacts our lawful reason for processing your personal information will be "legitimate interests". Under "legitimate interests" we can process your personal information if: we have a genuine and legitimate reason and we are not harming any of your rights and interests.

For Business to Consumer Clients and Contacts our lawful reason for processing your personal information will be "A contract with the individual" eg to supply goods and services you have requested, or to fulfil obligations under an employment contract. This also includes steps taken at your request before entering into a contract.

We are required by legislation, other regulatory requirements and our insurers to retain your data where we have ceased to act for you. The period of retention required varies with the applicable legislation but is typically five or six years. To ensure compliance with all such requirements it is the policy of the firm to retain all data for a period of seven years from the end of the period concerned.

## **WHO CAN ACCESS YOUR INFORMATION?**

- We will not give, sell or rent your information to third parties (unless agreed with you in advance for the purposes of enhancing the service that we provide to you by introducing you to 3<sup>rd</sup> parties who we work closely with).
- We will not share your information with third parties for marketing purposes.
- Any staff with access to your information have a duty of confidentiality under the ethical standards that this firm is required to follow.

## **THIRD PARTY SERVICE PROVIDERS WORKING ON OUR BEHALF**

We may pass your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf, for example to process payroll or basic bookkeeping. When we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

Please be assured that we will not release your information to third parties unless you have requested (verbally or in writing) that we do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention and detection of crime, fraud or corruption.

Please note that any verbal consents will be logged/documentated to ensure compliance with GDPR.

## **HOW YOU CAN ACCESS AND UPDATE YOUR INFORMATION**

In order to provide a high-level service to you it is important that we keep your information up to date and ensure that it is accurate. We endeavour to regularly review and correct where necessary, the information that we hold about you. If any of your information changes, please email or write to us.

You have the right to ask for a copy of the information that Adderley, Hill & Co holds about you.

## **MEASURES TO PROTECT THE LOSS, MISUSE OR ALTERATION OF YOUR INFORMATION**

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

Once we receive your information, we make our best effort to ensure its security on our systems. We endeavour to store your information in as few places as possible and encrypt confidential data where necessary. Records which we store on your behalf are stored at your own risk, these can be collected at a convenient time once we have delivered the work to which the data relates. Please contact our offices to arrange a collection of such records.

Your data will usually be processed in our offices in the UK. However, to allow us to operate efficient digital processes, we sometimes need to store information in servers located outside the UK, but within the European Economic Area (EEA). 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. We have sought confirmation from all of our suppliers that no information leaves the EEA for the purposes of GDPR compliance.

## **YOUR CHOICES**

We may occasionally contact you by email with details of any changes in legislation and regulatory requirements or other developments that may be relevant to your affairs and, where applicable, how we may assist you further. If you do not wish to receive such information from us, please let us know by contacting us as indicated under 'Contact information' below.

We offer a newsletter service to existing clients, which is designed to keep you up to date with changes in thresholds, tax rates and other such changes in legislation.

## YOUR RIGHTS

**Access to your information:** You have the right to request a copy of the personal information about you that we hold.

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

**Deletion of your information:** You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained
- You have validly objected to our use of your personal information – see 'Objecting to how we may use your information' below
- Our use of your personal information is contrary to law or our other legal obligations
- We are using your information with your consent and you have withdrawn your consent – see 'withdrawing consent to use your information' below.

## RESTRICTING HOW WE USE YOUR INFORMATION:

In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal 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 the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

**Objecting to how we may use your information:** Where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue. [*You have the right at any time to require us to stop using your personal information for direct marketing purposes.*]

**Withdrawing consent to use your information:** Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given. Please contact us in any of the ways set out in 'Contact information' below if you wish to exercise any of these rights.

## OUR PRIVACY NOTICE

We regularly review and update our privacy policy and will place any updates on the website shown below;

<https://adderleyhill.co.uk/index.php/about-us/legal>.

This privacy notice was last updated on 24<sup>th</sup> May 2018.

### **Contact information**

Contact: Jayne Tingle  
Telephone: 01527 872752  
Email: [jayne@adderleyhill.co.uk](mailto:jayne@adderleyhill.co.uk)  
Address: Mulberry House, Buntsford Park Rd, Bromsgrove, Worcestershire, B60 3DX

### **COMPLAINTS**

We seek to resolve directly all complaints about how we handle your personal information but you also have the right to lodge a complaint with the Information Commissioner's Office by visiting <https://ico.org.uk/concerns>