

# PRIVACY POLICY UNDER GDPR.

Version 1.2 | Dated: 29<sup>th</sup> May 2018

## Scope

This policy applies to the following business:

- W.H. Jones & Co, which is a partnership registered to provide accountancy services in the UK by the Institute of Financial Accountants (IFA). The address of the aforementioned company is at First Floor, 7 Newlands Court, Attwood Road, Burntwood, Staffordshire, WS7 3GF.

This privacy policy explains how we use any personal information we collect about you when you use our services or consent us to do so.

## Glossary of Terms

### *What is personal data?*

Personal data relates to any information about a natural person that makes you identifiable which may include (but is not limited to):

- Names and contact information i.e. emails and telephone numbers
- National Insurance Numbers
- Employment history
- Employee clock in numbers
- Personal tax information
- Statutory company records
- Payroll and accounting data

### *What is sensitive personal data?*

Sensitive personal data refers to the above but includes genetic and biometric data. For example:

- Racial or ethnic origin
- Biometric data (e.g. photo in an electronic passport).

### *What is a data controller?*

For general data protection regulation purposes, the “data controller” means the person or organisation who decides the purposes for which and the way in which any personal data is processed.

The data controller is W.H. Jones & Co, First Floor, 7 Newlands Court, Attwood Road, Burntwood, Staffordshire, WS7 3GF.

If there are any queries, please contact us at the above address, or by email at [info@whjones.co.uk](mailto:info@whjones.co.uk), or by calling 01543 270 239.

### ***What is a Data Processor?***

A “data processor” is a person or organisation which processes personal data for the controller.

### ***What is Data Processing?***

Data processing is any operation or set of operations performed upon personal data, or sets of it, be it by automated systems or not. Examples of data processing explicitly listed in the text of the GDPR are: collection, recording, organising, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing by transmission, disseminating or making available, aligning or combining, restricting, erasure or destruction.

### ***What do we mean by Business to Business?***

Ltd companies, local authorities and government institutions/departments.

### ***What do we mean by Business to Consumer?***

Private clients, sole traders, unincorporated partnerships.

## **What information do we collect about you and how?**

W.H. Jones & Co, as a data controller, is bound by the requirements of the General Data Protection Regulations (GDPR).

You agree that we are entitled to obtain, use and process the information you provide to us to enable us to provide the services agreed upon to you; and for other related purposes including (but not limited to):

- Updating and enhancing client records
- Analysis for management purposes
- Statutory records of business and consumers
- Statutory returns
- Legal and regulatory compliance
- Crime prevention.

We collect information about you when you fill in any of the forms provided by ourselves, or any details entrusted onto us via telephone, email or post at the above address.

## **How will we use the information about you and why?**

At W.H. Jones & Co we take your privacy seriously and will only use your personal information to provide the services you have requested from us. We will only use this information subject to your instructions, data protection law and our duty of confidentiality.

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 “Consent” and “legitimate interests”. E.g. with the consumers consent, we can provide the services requested, or to fulfil legal obligations. Under the “legitimate interests”, see above.

We may receive personal data from you for the purposes of our money laundering checks, such as a copy of your passport. This data will only be processed for the purposes of preventing money laundering and terrorist financing, or as otherwise permitted by law or with your expressed consent.

Our work for you may require us to pass on your information to third party service providers such as mortgage lenders, IFAs, agents and other associated organisations for the purposes of completing tasks and providing the services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the services agreed to you.

We will not share your information for marketing purposes with companies so that they may offer you their products and services.

## **Transferring your information outside of Europe**

We will never transfer your information to any location outside of the EU. However, if you require the use of our services whilst outside of the EU, your information may be transferred outside of the EU with your consent in order for us to provide you with these services.

## **Security precautions in place about data collected**

When you give us personal information, we take steps to make sure that it's treated securely. Any sensitive information such as bank details are not kept digitally, but kept securely stored at our premises, subject to permission levels.

Non-sensitive details (your email address etc.) are normally sent over the internet or by post. These methods can never be guaranteed to be 100% secure. As a result, while 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.

All information collected from you will be stored primarily on our client database, which is secured on the office server and protected by passwords only known to ourselves.

## **Third party access to data held**

There may be occasions when a third party technical support officer may have to take control over our network or machines that are connected to the network. However this will not take place without the supervision of one of our staff members to ensure that no personal data is accessed beyond what is necessary.

## **How long will we hold your data for?**

For the purposes of regulatory requirements, we will keep all information collected from you for 7 years. Documents will be securely destroyed or removed from our systems after 7 years, or upon services no longer being requested by you.

Permanent records will be kept indefinitely, until we are no longer obligated to hold these records on behalf of the consumer or business.

## **Access to your information, correction, portability and deletion**

### *What is a Subject Access Request?*

This is your 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 information, please email or write to us at the following address: W.H. Jones & Co, First Floor, 7 Newlands Court, Attwood Road, Burntwood, Staffordshire, WS7 3GF. We will respond to your request within one month of receipt of your request.

We want to make sure that the personal information we hold for you is accurate and up to date, and are required to do this under statutory regulations. You may ask us to correct or remove information you think is inaccurate or not up to date by emailing [info@whjones.co.uk](mailto:info@whjones.co.uk), or by writing to the above address.

### *Objections to processing of personal data*

It is your right to lodge an objection to the processing of your personal data if you feel the “grounds relating to your particular situation” apply. The only reasons we will deny your request is if we can show compelling legitimate grounds for the processing, which override your interest, rights and freedoms, or the processing is for the establishment, exercise or defence of a legal claim.

### *Data Portability*

It is also your right to receive the personal data which you have given to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without delay from the current controller if:

- (a) The processing is based on consent or on a contract, and
- (b) The processing is carried out by automated means.

## *Your Right to be Forgotten*

Should you wish for us to completely delete all information that we hold about you, please contact us by any of the following methods:

- Email: [info@whjones.co.uk](mailto:info@whjones.co.uk), or
- In writing to: W.H. Jones & Co, First Floor, 7 Newlands Court, Attwood Road, Burntwood, Staffordshire, WS7 3GF.

## **Complaints**

If you feel that your personal data has been processed in a way that does not comply fully with GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will then tell you of the progress and outcome of your complaint. The supervisory authority in the UK is the **Information Commissioner's Office**.

## **Changes to our Privacy Policy**

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 29<sup>th</sup> May 2018 and the Version number is 1.2 in line with the new GDPR guidelines.

## **How to contact us**

Please contact us if you have any questions about our privacy policy or information we hold about you:

- By email: [info@whjones.co.uk](mailto:info@whjones.co.uk)
- Call us on 01543 270 239
- Or write to us at W.H. Jones & Co, First Floor, 7 Newlands Court, Attwood Road, Burntwood, Staffordshire, WS7 3GF.