# J S Biddle Accountancy Ltd Privacy Policy

The privacy policy sets out how J S Biddle Accounting Ltd uses and protects any information that you give J S Biddle Accounting when you use this website.

J S Biddle Accounting Ltd is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website; you can be assured that it will only be used in accordance with this privacy statement.

J S Biddle Accounting Ltd may change its privacy policy from time to time by updating the page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from May 2018.

We may collect the following information from website visitors:

- Name and job title
- Contact information including email address
- Demographic information such as postcode, preferences and interests
- Other information relevant to client surveys,/li>

What we do with the information we gather?

To understand your needs and provide you with a better service we need to store this information. Information is also gathered for the following reasons:

- We may use the information to improve our services
- Internal record keeping
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by telephone, email or post dependant on the information you have given us. In certain circumstances we may use this information to customise the website.

#### Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure any information we collect online.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree to allow cookies, the file is added and it helps analyse web traffic. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your internet preferences.

We use traffic log cookies to identify which pages are being used. This enables us to improve our website by analysing data about webpage traffic and our clients' preferences. We will only ever use this information for statistical analysis and once it has been used the data is removed from the system.

Cookies help us provide you with a better website and service. A cookie in no way gives us access to your computer or any personal information, other than the data you choose to share with us.

You will always have the opportunity to accept or decline cookies. Although most web browsers automatically accept cookies, you can usually modify your browser setting it to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

#### Links to other websites

Our website may contain links to other websites of interest. Once you have left our site you should note that we do not have any control over the security of that website. We cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

#### Controlling your personal information

You may choose to restrict the collection or use of your personal information in the following ways:

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

Whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at <u>jsbaccounting@jsbiddle.co.uk</u>

You may request details of personal information which we hold about you under the Data Protection Act 1998. A small fee will be payable. If you would like a copy of the information held on you please write to J S Biddle Accounting Ltd, Greystone Cottage, Church Bank, Temple Grafton, Warwickshire, B496NU.

If you believe that any information we are holding on you is incorrect or incomplete, please get in contact with us as soon as possible, at the above address or via telephone. We will promptly correct any information found to be incorrect

#### **PRIVACY NOTICE**

#### **1. PURPOSE OF THIS NOTICE**

This notice describes how we collect and use personal data about you, in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act [1998 OR 2018] and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK ('Data Protection Legislation').

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

#### 2. ABOUT US

JS Biddle Accounting Limited ("JS Biddle Accounting", "we", "us", "our" and "ours") is an Accountancy and Tax Advisory firm. We are registered in England and Wales as a limited company under number 10205541 and our registered office is at Greystone Cottage, Church Bank, Temple Grafton, Warwickshire, B496NU.

For the purpose of the Data Protection Legislation and this notice, we are the 'data controller'. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

We have appointed a Data Protection. Our Data Protection Officer is our Data Protection Point of Contact and is responsible for assisting with enquiries in relation to this privacy notice or our treatment of your personal data. Should you wish to contact our Data Protection Point of Contact you can do so using the contact details noted at paragraph 12 (Contact Us), below.

# 3. HOW WE MAY COLLECT YOUR PERSONAL DATA

We obtain personal data about you, for example, when:

- You request a proposal/quotation from us in respect of the services we provide;
- You OR your employer OR our clients engages us to provide our services and also during the provision of those services;
- You contact us by email, telephone, post or social media (for example when you have a query about our services); or
- From third parties and/or publicly available resources (for example, from your employer or from Companies House).

# 4. THE KIND OF INFORMATION WE HOLD ABOUT YOU

The information we hold about you may include the following:

- Your personal details (such as your name and/or address);
- Details of contact we have had with you in relation to the provision, or the proposed provision, of our services;
- Details of any services you have received from us;
- Our correspondence and communications with you;
- Information about any complaints and enquiries you make to us;
- Information from research, surveys, and marketing activities;
- Information we receive from other sources, such as publicly available information, information provided by your employer OR our clients or information from our member network firms.

# 5. HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU

We may process your personal data for purposes necessary for the performance of our contract with you OR your employer OR our clients and to comply with our legal obligations.

We may process your personal data for the purposes necessary for the performance of our contract with our clients. 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.

#### Situations in which we will use your personal data

We may use your personal data in order to:

- Carry out our obligations arising from any agreements entered into between you OR your employer OR 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;
- Provide you with information related to our services and our events and activities that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes;
- Seek your thoughts and opinions on the services we provide; and
- Notify you about any changes to our services.

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.

If you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered into with you. Alternatively, we may be unable to comply with our legal or regulatory obligations.

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.

#### **Data retention**

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;
- the purposes for which we originally collected the personal data;
- the lawful grounds on which we based our processing;
- the types of personal data we have collected;
- the amount and categories of your personal data; and
- whether the purpose of the processing could reasonably be fulfilled by other means.

#### **Change of purpose**

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

# 6. DATA SHARING

#### Why might you share my personal data with third parties?

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.

#### Which third-party service providers process my personal data?

"Third parties" includes third-party service providers and other entities within our group OR the members of our firm's network. The following activities are carried out by third-party service providers: IT and Cloud services, professional advisory services, administration services, marketing services and banking services.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

#### What about other third parties?

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.

# 7. TRANSFERRING PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

We will not transfer the personal data we collect about you outside of the EEA.

# 8. DATA SECURITY

We have put in place commercially reasonable and appropriate security 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.

# 9. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

#### 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 us, using the contact details below.

#### Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object

to processing on this basis. You also have the right to object where we are processing your personal information for direct marketing purposes.

- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

If you want to exercise any of the above rights, please email our data protection point of contact

#### jsbaccounting@jsbiddle.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 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.

# **10. 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 our data protection point of contact *jsbaccounting@jsbiddle.co.uk*.

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.

# 11. CHANGES TO THIS NOTICE

Any changes we may make to our privacy notice in the future will be provided to you via updates on our website https://www.jsbiddle.co.uk/privacy-policy/.

This privacy notice was last updated on .....15/05/2018.

### **12. CONTACT US**