

## **PRIVACY POLICY**

### **How we use your personal information**

This privacy notice is to let you know how we look after your personal information. This includes what you tell us about yourself, what we learn by having you as a customer, and the choices you give us about marketing you want us to send you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

### **Our Privacy Promise**

We promise:

- To keep your data safe and private.
- Not to sell your data.
- To give you ways to manage and review your marketing choices at any time.

### **Data Protection law will change on 25<sup>th</sup> May 2018**

This notice sets out your rights under the new laws.

### **Our Contact Details**

Bennetts Accountancy Ltd, Edwinstowe House, High Street, Edwinstowe, Mansfield, Notts. NG21 9PR

Telephone: 01623 821500

Email: [info@bennettsaccountancy.co.uk](mailto:info@bennettsaccountancy.co.uk)

Web: [www.bennettsaccountancy.co.uk](http://www.bennettsaccountancy.co.uk)

### **How the law protects you**

As well as our Privacy promise, your privacy is protected by law. This section explains how that works.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Bennetts Accountancy Ltd. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what this is.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

What we use your personal information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> <li>• To manage our relationship with you or your business.</li> <li>• To develop new ways to meet our customers' needs and to grow our business.</li> <li>• To develop and carry out marketing activities.</li> <li>• To study how our customers use products and services from us and other organisations.</li> <li>• To provide advice or guidance about our products and services.</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent.</li> <li>• Fulfilling contracts.</li> <li>• Our legitimate interests.</li> <li>• Our legal duty</li> </ul>	<ul style="list-style-type: none"> <li>• Keeping our records up to date, working out which of our services may interest you and telling you about them.</li> <li>• Developing services, and what we charge for them.</li> <li>• Defining types of customers for new services.</li> <li>• Seeking your consent when we need to contact you.</li> <li>• Being efficient about how we fulfil our legal duties.</li> </ul>
<ul style="list-style-type: none"> <li>• To deliver our products and services.</li> <li>• To prepare tax returns, accounts, vat returns and provide payroll services.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts.</li> <li>• Our legitimate interests.</li> <li>• Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> <li>• Complying with regulations that apply to us.</li> </ul>
<ul style="list-style-type: none"> <li>• To manage risk for us and our customers.</li> <li>• To obey laws and regulations that apply to us.</li> <li>• To respond to complaints and seek to resolve them.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts.</li> <li>• Our legitimate interests.</li> <li>• Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>• Complying with regulations that apply to us.</li> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>• To exercise our rights set out in agreements or contracts.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> </ul>	

## Groups of Personal Information

We use many different kinds of personal information, and group them together like this.

Type of personal information	Description
Financial	Information relevant to preparing accounting and taxation returns.
Contact	Where you live and how to contact you.
Socio-Demographic	This includes details about your work or profession and nationality.
Contractual	Details about the services we provide to you
Open Data and Public Records	Details about you that are in public records, such as Companies House, and information about you that is openly available on the internet.
Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, drivers licence or birth certificate
Consents	Any permissions, consents or preferences that you give us. This includes things like how you want us to contact you.
National Identifier	A number or code given to you by a government to identify who you are, such as a National Insurance number.

## Where we collect personal information from

We may collect personal information about you (or your business) from these sources:

Data you give us:

- When you apply for our services.
- When you talk to us on the phone or in person.
- When you use our website.
- In emails, letters and other documents.

Data from third parties we work with:

- Companies or people that introduce you to us.
- Financial advisers.

- Banks.
- Insolvency Practitioners.
- Social Networks.
- Public information sources such as Companies House.

## **Who we share your personal information with**

We may share your personal information with these organisations:

- HM Revenue & Customs, regulators and other authorities.
- Fraud prevention agencies.
- Companies that we introduce you to.
- Banks and other lenders.
- Insolvency practitioners.
- Independent Financial Advisors.
- Companies you ask us to share your data with.

We may also share your personal information if the make-up of Bennetts Accountancy Ltd changes in the future:

- We may choose to sell, transfer, or merge parts of our business, or our assets. Or we may seek to acquire other businesses or merge with them.
- During any such process, we may share your data with other parties. We'll only do this if they agree to keep your data safe and private.
- If the change to our business happens, then other parties may use your data in the same way as set out in this notice.

## **Credit Reference Agencies**

We carry out credit and identity checks when you apply for our services for you or your business. We may use Credit Reference Agencies to help us with this.

If you use our services, from time to time we may also search information that the CRAs have, to help us manage those accounts.

We will share your information with the CRAs and they will give us information about you. The data we exchange can include:

- Name address and date of birth
- Credit application
- Details of any shared credit
- Financial situation and history
- Public information, from sources such as the electoral register and Companies House.

We'll use this data to:

- Assess whether you or your business is able to afford to make payments
- Make sure what you've told us is true and correct
- Help detect and prevent financial crime

When we ask CRS's about your business, they will note it on your credit file. This is called a credit search. Other lenders may see this and we may see credit searches from other lenders.

## **If you choose not to give us personal information**

We may need to collect personal information by law, or under the terms of contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform the services needed.

Any data collection that is optional would be made clear at the point of collection.

## **Marketing**

We may use your personal information to tell you about relevant services. This is what we mean when we talk about 'marketing'.

The personal information we have for you is made up of what you tell us, and data we collect when you use our services, or from third parties we work with.

We study this to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services may be relevant for you.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

You can ask us to stop sending you marketing messages by contacting us at any time.

We may ask you to confirm or update your choices, if you take out any new services with us in future. We will also ask you to do this if there are changes in the law, regulation, or the structure of our business.

If you change your mind you can update your choices at any time by contacting us.

## **How long we keep your personal information**

We will keep your personal information for as long as you are a customer of Bennetts Accountancy Ltd.

After you stop being a customer, we may keep your data for up to 8 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.

We may keep your data for longer than 8 years if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

## **How to get a copy of your personal information**

You can access your personal information we hold by writing to us at our address.

## **Letting us know if your personal information is incorrect**

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this.

If you do we will take reasonable steps to check its accuracy and correct it.

## **What if you want us to stop using your personal information?**

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It is not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it, please contact us.

## **How to withdraw your consent**

You can withdraw your consent at any time. Please contact us if you want us to do so.

If you withdraw your consent, we may not be able to provide certain services to you. If this is so we will tell you.

## **How to complain**

Please let us know if you are unhappy with how we have used your personal information.

You also have the right to complain to the Information Commissioner's Office.

## **Formats for sharing data**

The Data Privacy laws will change on 25<sup>th</sup> May 2018. From that date you will have the right to get your personal information from us in a format that can be easily re-used.

You can also ask us to pass on your personal information in this format to other organisations.