

# **Privacy Policy**

## **Privacy Policy and GDPR**

Version 1.1 Dated May 2018

### Scope

This policy applies to the following businesses:

Reid & Co Corporate Services Limited, chartered accountants and business advisers, registered to carry out work in the UK and Ireland and registered for a range of investment business activities by the Institute of Chartered Accountants in England and Wales.

Registered Company number 2300857. Registered Office: Artemis House, 4a Bramley Rd, Mount Farm, Milton Keynes, MK1 1PT.

The privacy policy explains how we use any personal information we collect about you when you use this website and our wider services.

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### **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 numbers
- Credit History
- Personal tax
- Payroll and accounting data

#### **What is sensitive personal data?**

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

- Medical conditions

- Religious or philosophical beliefs and political opinions
- Racial or ethnic origin
- Convictions
- 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 Reid & Co Corporate Services Ltd, Artemis House, 4a Bramley Rd, Mount Farm, Milton Keynes, MK1 1PT.

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

Reid & Co Corporate Services Ltd, 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 discharge the Services (as defined in our Letter of Engagement and supporting Schedules) and for other related purposes including;

- Updating and enhancing client records
- Analysis for management purposes
- Carrying out credit checks in relation to you
- Statutory returns
- Legal and regulatory compliance
- Crime prevention.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with an answer to an enquiry. In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

### **Cookies**

We collect information about you when you fill in any forms on our website i.e. sending an enquiry, signing up for an event, filling in a survey, giving feedback etc. Website usage information is collected using cookies.

Cookies are text files put on your computer to collect standard internet log information and visitor behaviour information. This information is then used to track visitor use of the website and to create

statistical reports on website activity. For more information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. Please note in a few cases some of our websites features may not function because of this.

IP addresses:

An IP or Internet Protocol Address is a unique numerical address assigned to a computer as it logs on to the internet. Reid & Co Corporate Services Ltd do not have access to any personal identifiable information and we would never seek this information.

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

At Reid & Co Corporate Services Ltd we take your privacy seriously and will only use your personal information to provide the Services you have requested from us, detailed in your Letter of Engagement and supporting Schedules and as we have identified above. We will only use this information subject to your instructions, data protection law and our duty of confidentiality.

We may receive personal data from you for the purpose 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 express consent.

Our work for you may require us to pass your information to our third-party service providers, agents, subcontractors 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 and we have contracts in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

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**

As part of the services offered to you through this website, the information which you give to us may be transferred to countries outside the European Union ("EU"). For example, some of our third-party providers may be located outside of the EU. Where this is the case we will take steps to make sure the right security measures are taken so that your privacy rights continue to be protected as outlined in this policy. By submitting your personal data, you're agreeing to this transfer, storing and processing. Where our third-party suppliers are in the US we have ensured that their services fall under the "Privacy Shield" whereby participating companies are deemed to have adequate protection and therefore facilitate the transfer of information from the EU to the US.

### **Profiling**

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of extra information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and cut fraud and credit risk.

### **Marketing**

We would like to send you information about our services which may be of interest to you. If you have consented to receive marketing, you may opt out at any point as set out below.

You have the right at any time to stop us from contacting you for marketing purposes. To opt out please email: [cynthia@reid-co.co.uk](mailto:cynthia@reid-co.co.uk)

## **Data Security**

We have put in place 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 personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **Data retention – how long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **Your legal rights**

Under certain circumstance, you have rights under data protection laws in relation to your personal data.

- Request access to your personal data.

Request access to your personal data (Commonly known as a “data subject access request”) This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- Request correction of your personal data.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide us.

- 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 successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Object to processing of your personal data.

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 ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may

demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- Request restriction of processing your personal data. Request transfer of your personal data.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims' or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- Request the transfer

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- Right to withdraw consent.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

If you wish to exercise any of the rights set out above, please contact [sarah@reid-co.co.uk](mailto:sarah@reid-co.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 is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **Your right to be Forgotten**

Should you wish for us to completely delete all information that we hold about you contact us:

Email: [sarah@reid-co.co.uk](mailto:sarah@reid-co.co.uk)

In writing to:

Reid & Co Corporate Services Ltd

Artemis House

4a Bramley Rd

Mount Farm

Milton Keynes

MK1 1PT

## **Other websites**

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

## **Complaints**

If you feel that your personal data has been processed in a way that does not meet the 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 the privacy notice and your duty to inform us of changes**

This version was last updated on 22/05/2018. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **How to contact us**

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

- Email: [sarah@reid-co.co.uk](mailto:sarah@reid-co.co.uk)
- In writing to:

Reid & Co Corporate Services Ltd

Artemis House

4a Bramley Road

Mount Farm

Milton Keynes

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