

GENERAL DATA PROTECTION REGULATION

At Moffatts we respect your privacy and are committed to protecting your personal data.

This privacy notice describes how we collect and use personal data about you, in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act 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.

INTRODUCTION

The Moffatts Partnership LLP is an accountancy, business and tax advisory firm and Registered Auditors (collectively referred to as "Moffatts", "we", "us", "our" and "ours" in this privacy notice). We are registered in England and Wales as a limited liability partnership under number OC416727 and our registered office is at Progress House, 396 Wilmslow Road, Withington, Manchester, M20 3BN.

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 Privacy Officer. Our Privacy 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 10 below.

1. HOW WE MAY COLLECT YOUR PERSONAL DATA

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

- you request a proposal from us in respect of the services we provide;
- you or your employer 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, we may consult publicly available sources of information, such as the Companies House Register, which hold personal data about you in order to complete customer due diligence checks to comply with anti-money laundering legislation. We may also need to consult other external sources such as credit reference agencies.

Data relating to children will only be collected with the parent or legal guardians consent and only where required for statutory purposes.

2. THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data or personal information is any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:-

- Identity Data – this includes your first names, last name, maiden name, title, marital status, username or similar identifier, date of birth and gender.
- Contact Data – this includes postal address, e-mail address and telephone numbers.
- Transaction Data - this includes details of payments to and from you and details of any services you have received from us.
- Technical Data – this includes internet protocol (IP) address browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Usage Data – this includes information about how you use our website, products and services.
- Marketing and Communications Data – this includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Professional Data – this includes any information we may collect in the course of providing services to you.

3. 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 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 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.

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

Whilst all our data is stored in the UK, certain third party service providers we use may transfer the personal data we collect about you outside the EEA.

We have put in place procedures to ensure that your personal data is treated by those third parties in a way that is consistent with and which respects the Data Protection Legislation.

Should you require further information about these protective measures, please contact us using the contact details outlined below.

6. 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.

Please note that e-mails are not 100% secure. We advise that you take this into account before e-mailing personal and confidential information to us. If you send information by e-mail to us, you are doing so at your own risk.

7. 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 e-mail our Privacy Officer at partners@moffattsaccounts.com.

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.

8. 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 e-mail our Privacy Officer at partners@moffattsaccounts.com.

9. CHANGES TO THIS NOTICE

Any changes we may make to our privacy notice in the future will be updated on our website and, where appropriate, notified to you by e-mail.

This privacy notice was last updated on 24th May 2018, please check back frequently to see any changes or updates to our Privacy Notice.

10. CONTACT US

If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please address any requests to:

Privacy Officer
The Moffatts Partnership LLP
Progress House
396 Wilmslow Road
Withington
Manchester.
M20 3BN
Telephone Number: 0161 434 8416
E-mail: partners@moffattsaccounts.com.

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone - 0303 123 1113 (local rate) or 01625 545 745
Website - <https://ico.org.uk/concerns>