

Privacy Notice (also known as “Fair Processing Notice”)

Data Controller: Turnbull & Co Accountants Ltd, registered with the Information Commissions office (ICO) under reference Z8646272

Contact for queries: 01752 256161

Address: Pilgrim House, Oxford Place, Plymouth PL1 5AJ

How the law protects you

We are committed to protecting and respecting your personal data and privacy. This privacy policy relates to our use of any personal data we collect from you and other sources listed below. Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal data.

As well as this Privacy Policy, your privacy is protected by law. The General Data Protection Regulation (‘GDPR’) that came into force on 25 May 2018 ensures that we use your personal information only if we have a proper reason to do so. The law says we must have one or more of these reasons for using your data:

- To fulfil a contract we have with you to provide our services
- Where it is our legal duty
- When it is in our legitimate interest
- When you consent to the use of the data

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 that is.

How will we use the information you give us?

Before we process your accountancy, tax and payroll affairs, we undertake checks for the purposes of preventing fraud and money laundering and to verify your identity. These checks require us to process personal information about you and any relevant named persons. We will only use your information on the basis that it is necessary to administer your accountancy and tax affairs. Where we need to pass information to other firms, it will only be for that purpose. These firms will be fraud prevention agencies and firms handling claims on your behalf or mortgage or loan applications. It includes finance providers and firms that review our records for our internal standards or the Institute of Chartered Accountants in England and Wales.

When we contact you, it will either be for the above reason, or because we have a legitimate interest in marketing related products. For any other marketing it will only be with your consent and you will be able to withdraw your consent or unsubscribe easily at any time.

When we and fraud prevention agencies process your personal data, we do so on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity in order to protect our business and insurers to comply with laws that apply to us. Such processing is also a contractual requirement of the service you will be provided.

We, and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent fraud or crime.

Fraud prevention agencies can hold your personal data for a different period of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for a period of up to 6 years. If we or a fraud prevention agency determine that you pose a fraud or money laundering risk, we may refuse to act for you. A record of any fraud or money laundering risk will be retained by the fraud prevention agencies and may result in others refusing to provide you services, financing or employment. If you have further questions, please contact us on the details above.

What type of personal information do we need and what we share?

- We may need personal details which might include details of members of your family, lifestyle, finances, or business.
- We will only collect what is necessary and will only keep it for as long as we are required to do in line with our data retention policy.

What other types of information do we need?

- We will only collect what is necessary and protect it with appropriate security measures.

How do we obtain your information?

- We may gather it from information you submit to a website, by telephone, face to face or by email.
- We may receive it from Companies House, HMRC or your previous accountants.

Data Transfers

If we have to transfer information to a third country outside the EU, we will only do so if a similar level of protection applies. If we need to obtain information which is by nature sensitive, we will only do so on the basis that it is in the public interest - for example to fight crime, prevent fraud or to make sure insurance is available.

What are my legal rights?

- You have the right to complain to the Information Commissioner at www.ico.org.uk, Tel 0303 123 11132.
- You can obtain a copy of your personal information from us without charge by contacting us at the address above. This may include the right to transfer information to other providers.
- You have the right to ask us to correct information.
- You have the right to ask us to delete your information or stop using it.
- You may have the right to object if decisions about you are made solely by a computer.