Legal & privacy policy

Your privacy is important to us.

Your privacy is important to us

We recognise that when you visit the site and provide us with personal information, you trust that we will act responsibly and keep your information secure and confidential.

1. Purpose of this notice

This notice describes how we collect and use personal data about you. In the UK this will be in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act 1998 and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

2. About us

Fairhead Bradford Accountants Limited is an accountancy firm. We are registered in England and Wales as a limited company under number: 05885141 and our registered office is at 5 Queen Street, Great Yarmouth, Norfolk, NR30 2QP.

We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

Fairhead Bradford Accountants Limited is the data controller with respect to your personal data if you have any queries about this please contact our Data Protection point of contact: Stuart Dickerson, stuart.d@fairheadbradford.co.uk

Our Data Protection Point of Contact is responsible for assisting with enquiries in relation to this privacy notice or our treatment of your personal data.

3. Data retention period

Our general policy is to hold data for seven years. This applies to all categories of personal data unless a shorter or longer period is specified in respect of particular categories of data. However for existing clients where the information may be required or relevant to future periods the information may be held for longer.

4. How we collect and use personal data

How we collect and use personal data varies according to our relationship with the person whose data it is (the 'data subject'). How we collect data can be categorised as follows:

- Personal clients and persons associated with corporate clients
- Other individuals whose personal data we obtain in the course of providing services to our clients
- Business contacts
- Our employees and partners
- Recruitment applicants

- Suppliers
- Users of our website
- Visitors to our offices
- 5. Data sharing

Why might we share your personal data with third parties?

We will share your personal data with third parties where we are required by law or regulation, where it is necessary in the provision of services to our clients, or for administration purposes, or where we have another legitimate reason 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. The following activities are carried out by third-party service providers: IT and cloud services, professional advisory 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, professional body or an external quality control reviewer, or to otherwise comply with the law. In the case of the external quality control reviewers, they are not allowed to use or share you data with any one else.

6. Transferring personal data outside of the European Economic Area (EEA)

Except as noted below or where specifically requested by you, we will not transfer the personal data that we collect about you outside the EEA.

Where a client asks us to introduce them to a service provider outside the EEA and have instructed us to transfer personal data to them, we will make this transfer in accordance with their instructions.

7. 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 our 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.

8. Rights to access, correction, erasure and restriction

Your duty to inform us of changes

It is important that the personal data we hold is accurate and current. Should your personal information that you have supplied to us change, please notify us of any changes of which we need to be made aware by informing your usual Fairhead Bradford contact.

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 Stuart dickerson, at stuart.d@fairheadbradford.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.

9. 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 stuart.d@fairheadbradford.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.

10. Changes to this notice

We will keep this privacy statement under regular review and any changes will be shown on this web page.

This privacy notice was last updated on 21 May 2018.

11. 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 email Stuart Dickerson, at stuart.d@fairheadbradford.co.uk.

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

SPECIFIC DATA SUBJECT TYPES

PERSONAL CLIENTS AND PERSONS ASSOCIATED WITH CORPORATE CLIENTS

Who do we collect information about?

We collect information about clients who are individuals, about the owners of our clients, about the management of our clients and about persons connected with our clients who we interact with in the course of our work (for example we may have contact details for various people within the finance department of our audit clients who provide us with information during the course of our work).

What personal information do we collect?

It is our policy only to collect the personal information which is required for our work. In some cases this may mean that the only personal information that we hold is contact information and details of any communications with that person, but in other cases this may include:

- Financial information
- Information about business activities
- Information about family or business relationships
- Information about marketing activities

What is the source of this information?

This information is usually supplied by clients, but may also be supplied by third parties who have been authorised by clients or from publicly available information.

How do we use this data?

We may use this data to carry out our obligations arising from any agreements entered into between our clients and us (for example in providing tax advice to personal clients). In addition we may use this data in managing our relationships with our clients and in providing to our clients information about our services or other information that we consider may be of interest to them.

The basis for this processing is the contracts that we have with our clients, legal obligations and/or that such processing is necessary for our or our clients' legitimate interests.

How long do we retain this data for?

We will retain personal data in accordance with our data retention policy for as long as is necessary to fulfil the purposes for which it is collected, including any retention period required by laws or regulations (for example audit regulations require information on audit files to be retained for the current year plus the previous six years).

OTHER INDIVIDUALS WHOSE PERSONAL DATA WE OBTAIN IN THE COURSE OF PROVIDING SERVICES TO OUR CLIENTS

Who do we collect information about?

The services that we provide to our client sometimes require us to collect personal information about other individuals (for example where we provide payroll services we will be provided with the personal information about the employees of our client necessary to deliver this service or where we are auditing a client we may need to obtain personal information about employees in order to verify the wages figures in their accounts).

What is the source of this information?

This information is usually supplied by clients, but may also be supplied by third parties who have been authorised by clients (for example other payroll providers).

What personal information do we collect?

It is our policy only to collect the personal information which is required for our work. This may include:

- Salary details
- Bank account details
- Addresses
- Investments and other financial details
- Details about people meeting the definition of related parties of our clients (for example close family of directors)
- Other personal details required to provide our services

The GDPR identifies personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation as special categories of personal data.

We would not normally receive such data, but may do so where this is necessary for our work (for example in processing a payroll on behalf of a client we may be instructed which employees should have trade union subscriptions deducted).

How do we use this data?

We may use this data to carry out our obligations arising from any agreements entered into between our clients and us (for example in providing audit reports on our clients' accounts). Data obtained in this way will only be used to the extent necessary to provide these services. We will not use it for any other purpose. In particular we will not use it for marketing purposes.

The basis for this processing is the contracts that we have with our clients, legal obligations and/or that such processing is necessary for our or our clients' legitimate interests.

How long do we retain this data for?

We will retain personal data in accordance with our data retention policy for as long as is necessary to fulfil the purposes for which it is collected, including any retention period required by laws or regulations or by our (for example payroll files to be retained for the current year plus the previous six years).

BUSINESS CONTACTS

Who do we collect information about?

We also collect information about business contacts other than personal clients and persons associated with corporate clients.

What is the source of this information?

This information is provided by the business contacts themselves, usually at exhibitions and events, networking groups and other meetings involving Fairhead Bradford employees and Directors.

What personal information do we collect?

In the case of business contacts we collect information necessary for our communications with them. This may include:

- Contact details
- Business details

How do we use this data?

We may use this data to communicate with contacts about possible business opportunities, our range of professional services.

The basis for this processing is either the consent of the contacts themselves or legitimate business interest. This consent may be withdrawn at any time (see the contact us section of the privacy policy for details of who to contact).

How long do we retain this data for?

We will retain personal data in accordance with our data retention policy for as long as is necessary to fulfil the purposes for which it is collected. For business contacts the data is retained for at least as long as we have a business relationship with them.

OUR EMPLOYEES

Current employees should refer to the Employees handbook

RECRUITMENT APPLICANTS

Who do we collect information about?

We collect personal data about applicants for a position with Fairhead Bradford.

What is the source of this information?

The principal source of this information is the applicants themselves, however we may also collect information from third parties (for example references) or use publicly available information.

What personal information do we collect?

We collect information necessary to evaluate individuals for employment with Fairhead Bradford. This may include:

- Employment history
- Education
- References

- Contact details
- Our assessment of the candidate's suitability

How do we use this data?

We use this data to evaluate the suitability of individuals for employment with Fairhead Bradford.

The basis for this processing is that such processing is necessary for our legitimate interests and to comply with legal requirements.

How long do we retain this data for?

We will retain personal data in accordance with our data retention policy for as long as is necessary to fulfil the purposes for which it is collected.

If an applicant becomes an employee of Fairhead Bradford their personal information will be retained in accordance with the policies for our employees and partners (see section above on 'Our Employees').

If an applicant does not become an employee of Fairhead Bradford their personal data will no longer be kept unless they consent for us to do so for the purposes of notifying them of future vacancies.

OUR SUPPLIERS

Who do we collect information about?

We collect personal information about our suppliers (where these are individuals) and persons associated with them (for example our relationship manager at a supplier).

What is the source of this information?

The source of this information is the suppliers themselves.

What personal information do we collect?

We collect the information necessary to manage our relationships with our suppliers. This may include:

- Contact details
- Business activities
- Bank details

How do we use this data?

We use this data to manage our relationships with our suppliers.

The basis for this processing is the contracts that we have with our suppliers, legal obligations and/or that such processing is necessary for our legitimate interests.

How long do we retain this data for?

We will retain personal data in accordance with our data retention policy for as long as is necessary to fulfil the purposes for which it is collected. For suppliers such data will be held for at least as long as we have a business relationship with them.

USERS OF OUR WEBSITE

Who do we collect information about?

We collect personal data about users of our website if they choose to provide this information to us. In addition, we collect some limited personal data via the use of cookies on our website.

What is the source of this information?

The data is provided by users of the website if they choose to do so.

What personal information do we collect?

The principal information that is collected is the contact details provided by the website user however, depending on the nature of the submission other personal information may be provided.

How do we use this data?

Data is used in order to respond to communications from the users of the website. In some cases users will sign up to services which will result in them becoming business contacts, in which case their data will be used in accordance with the 'Business Contacts' section of this policy.

Data is processed on the basis of the consent of the website user, which is given when the data is provided.

How long do we retain this data for?

We will retain personal data in accordance with our data retention policy for as long as is necessary to fulfil the purposes for which it is collected.

Cookies

A cookie is a small text file written to the hard drive when a visitor accesses a website, it contains information about their actions on the website. Most web browsers allow users to opt out of receiving cookies, however you may find that some features of the website are impaired if you do this. Further details on how we use cookies can be found on our cookies page.

VISITORS TO OUR OFFICES

Who do we collect information about? We collect data about who is present in our offices.

What is the source of this information?

Information is provided by the visitors when they sign in on our electronic register of who is present in our office.

What personal information do we collect?

The information collected is:

- Name
- Company

How do we use this data?

Data is used to manage the security of our offices, for fire safety and to manage our office car parking.

The basis for this processing is that such processing is necessary for our legitimate interests and/or to comply with legal obligations.

How long do we retain this data for?

Data is retained for one day only.

Data collection by others

Some of our offices are in properties which are managed by others. The managers of these properties may collect personal data for their own purposes (for example by marinating a register of visitors to the property of by use of CCTV systems). Fairhead Bradford is not the data controller with regard to such information.

Photography etc

When attending any events organised or sponsored by Fairhead Bradford, photography, video and audio recording may occur. The firm reserves the right to use any such material without the expressed written permission of those included and to use it for promotional purposes. If you desire not to be included please contact stuart.d@fairheadbradford.co.uk in writing and outline your intentions. We are more than happy to liaise with you and try to make arrangements so you can attend on your conditions.

We reserve the right to change, modify, or update this statement at any time without notice.

Disclaimer

The information contained on our website is of a general nature and not intended to address the circumstances of any particular individual or entity. Whilst we have made an effort to provide accurate and up to date information, it is recommended that you consult us before taking or refraining from taking action based on matters discussed.

Legal information

Fairhead Bradford is a trading name of Fairhead Bradford Accountants Limited with offices in Great Yarmouth, Stalham and Little Melton.

VAT

Fairhead Bradford is VAT registered, reference 889 8649 23.

Chartered accountants and business advisers

Fairhead Bradford is registered by the Institute of Chartered Accountants in England and Wales (ICAEW) to carry out audit work in the UK. Details about our registration can be viewed at <u>www.auditregister.org.uk</u> for the UK under reference C001401002. Audit work is governed by Audit Regulations and Guidance, which can be found at <u>www.icaew.com/en/technical/audit-and-assurance/working-in-the-regulated-area-of-audit</u>.

Professional liability insurance details

The Fairhead Bradford's professional indemnity insurer is Manchester Underwriting Management. The territorial coverage is generally worldwide but the cover excludes professional business carried out in the United States of America or Canada and also excludes any action for a claim brought in any court in the United States of America or Canada.

Conflict of interest avoidance measures

Should a conflict of interest arise, either between two or more of our clients, or in the provision of multiple services to a single client, Fairhead Bradford will take such steps as are necessary to deal with the conflict. In resolving the conflict, Fairhead Bradford would be guided by the Code of Ethics of the Institute of Chartered Accountants in England and Wales which can be viewed at <u>www.icaew.com/en/members/regulations-standards-and-guidance/ethics</u>, section B, sub-section 220.

Codes of conduct

Work carried out by Fairhead Bradford is governed by the Code of Ethics of the Institute of Chartered Accountants in England and Wales, which can be found at http://www.icaew.com/en/members/regulations-standards-and-guidance/ethics.