

# Electric Accountancy: Privacy Policy/GDPR

Electric Accountancy is committed to the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR), and complies with its principles to ensure that personal information is:

- Processed lawfully, fairly and in a transparent manner;
- Processed for specified, explicit and legitimate purposes, and not processed for incompatible purposes;
- Adequate, relevant and limited in relation to the purposes of processing;
- Accurate and, where necessary, kept up-to-date;
- Not kept for longer than is necessary, in a form which permits identification;
- Processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing, against accidental loss, destruction or damage.

## When we collect information

- When we receive a request for a proposal for our services.
- When we have been engaged to provide services.
- During the provision of services that we have contracted to provide.
- If certain information is not provided when requested, we may not be able to perform the contract that we have entered into.
- Examples of additional sources for the data that we may collect includes:
  - a spouse/partner
  - HMRC
  - your employer/partnership/limited liability partnership (LLP)/company
  - electronic ID verification providers
  - other third parties (e.g. banks, investment managers, previous accountant etc.).

## What information we collect

- Personal details such as name, billing address, e-mail, phone numbers.
- Your username and password to allow access to our products and services.
- Customer data or customer company data which you store and use with us.
- Details of services that you have received from us, or the proposed provision of services.
- Our correspondence and communications with you.
- Information about any complaints or enquiries you make to us.
- Information about your system as it interacts with us such as your IP address and browser information.
- Feedback, information from research, surveys and marketing activities.
- Information from other sources, such as publicly available information.
- Information provided by you, your employer, or our clients.
- Information on your financial data needed to provide you with our services.

## What we do with your personal data

- We use personal data to supply professional services to you as our client.
- When accessing information held electronically by HMRC, we may have access to more information than we need and will only access records reasonably required to carry out the contract.
- We may process personal data where you are an employee, subcontractor, supplier or customer of our clients.
- We process your personal data to fulfil our obligations under relevant laws and to comply with professional obligations as members of AAT.
- We may use the information in the investigation/defence of potential complaints, disciplinary and legal proceedings.
- We may use it to improve your experience and to tell you about our services, events and activities, if you have consented to be contacted for such purposes.
- We may use your personal data for our own legitimate interests, provided this does not override any of your own interests and rights which require the protection of personal data, e.g. for marketing, business development, statistical, management purposes.
- We may, with your consent, process your personal data for additional purposes.
- In the limited situations where specific consent is required, you have the right to withdraw your consent for this specific purpose.
- We may anonymise or pseudonymise your data so that it can no longer be associated with you, in which case we may use it without further notice to you.

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Purposes of processing data	Legal basis of processing
Providing the services requested by you and agreed by contract	Contract basis
Sharing with third party service providers for specified purpose	Consent basis
Contacting you with details of relevant information and other services we provide	Consent basis
Meeting legal and regulatory purposes	Legal obligation basis
Protection against potential legal and other disciplinary action	Legitimate interest basis
Marketing, business development, statistical, management purposes	Legitimate interest basis

## When we share your personal data

- We may share your personal data to fulfil our obligations under relevant laws and to comply with professional obligations as members of AAT. This may include sharing it without your knowledge or consent, where we are legally required or permitted to do so.
- We may share your personal data where it is necessary to administer the relationship between us or where we have a legitimate interest in doing so.
- We may permit third party service providers to process your personal data for specified purposes in accordance with your instructions to us.
- In the limited situations where specific consent is required, you have the right to withdraw your consent for this specific purpose.
- We may share your personal data in the context of a possible sale or restructuring of our business.
- In the event of permanent incapacity or illness, we may share your information so that an alternative can contact with you, and agree the work to be undertaken. You can appoint another agent at that stage if you wish.
- Specific persons/organisations to whom we may share personal data includes:
  - HMRC
  - Our professional body AAT, and/or the Office of Professional Body Anti-Money Laundering Supervisors (OPBAS)
  - The Police and Law enforcement agencies
  - Courts and tribunals
  - The Information Commissioner's Office (ICO)
  - Third parties with whom you require or permit us to correspond, including professional advisory services, accountants, administration services, marketing services, banking services and product providers
  - Subcontractors
  - An alternative appointed by us in the event of incapacity, illness, death
  - Tax insurance providers
  - Professional indemnity insurers.

## Security of your information

- We use accepted methods to protect your information.
- We review our security procedures carefully & regularly.
- We limit access to your information to those with a business need to know. They only process your information on our instruction and are subject to a duty of confidentiality.
- We have procedures in place to deal with a suspected data security breach.
- We will notify you and any regulator of a suspected breach where legally required to.
- Where possible, your data is processed in the EEA.
- Where data has to be transferred outside of the EEA, we ensure that appropriate security measures are in place to protect the data.

## How long we retain your information

- You are responsible for retaining records that we send to you.
- Documents and records relevant to your tax affairs are required by Law to be retained by you:

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- Individuals, trustees and partnerships with trading or rental income: five years and 10 months after the end of the tax year;
- Otherwise: 22 months after the end of the tax year;
- Companies, LLPs and other corporate entities: Six years from the end of the accounting period
- We will only retain your data for as long as it is necessary to fulfil the purposes for which it is collected:
  - Tax returns: information retained for 7 years from end of the tax year
  - Ad hoc advisory work: information retained for 5 years from cessation of contract
  - Ongoing work: information retained for 5 years from cessation of contract.
  - We will return any original documents to you when we cease to act for you or upon request. We may destroy documents older than seven years old.

## Your rights in connection to your information

- Under certain circumstances, by law you have a right to make the following requests to Hockley Homes Ltd:
- Request access to the personal data that we hold about you and to check that we are processing it lawfully.
- Request correction of your personal data that we hold about you.
- Object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party).
- Object to the processing of your personal data for the purpose of direct marketing.
- Request the restriction of processing of your personal data, e.g. if you want to suspend the processing of personal data whilst you establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or to another data controller if the processing is based on consent, carried out by automated means and is technically feasible.
- There is no fee for accessing your personal data or for exercising your legal rights. However, a reasonable fee may be applied for unfounded or excessive access requests.
- We may ask for specific information from you before complying with any request, in order to ensure that personal information is not disclosed to a person with no right to receive it.
- To exercise your rights, email Rebecca Webster: [rebeccawebster@hockleyhomes.co.uk](mailto:rebeccawebster@hockleyhomes.co.uk)
- There are circumstances in which the Law allows us to refuse to provide access to personal data, e.g. there has been little or no change since we complied with a previous request.

## How to withdraw consent

- If you have provided consent to the collection, processing and transfer of your personal data for a specific purpose (e.g. for direct marketing or newsletters), you can withdraw your consent for that specific purpose at any time.
- To withdraw consent, email Rebecca Webster: [rebeccawebster@hockleyhomes.co.uk](mailto:rebeccawebster@hockleyhomes.co.uk).
- Once you have withdrawn consent for a specific purpose, we will no longer process your personal information for that specific purpose, unless we have another legitimate basis for doing so in law.

## Deleting your records

- You may request erasure of your personal data where there is no good reason for us to continue holding it.
- There are some circumstances where we have the right to refuse to comply with a request for erasure.
- To request erasure, email Rebecca Webster: [rebeccawebster@hockleyhomes.co.uk](mailto:rebeccawebster@hockleyhomes.co.uk).
- Further information is available on the ICO website ([www.ico.org.uk](http://www.ico.org.uk)).

## Contact us if you have questions or concerns

- We may amend this notice from time to time. The latest version is available on our website, or email Rebecca Webster to request a copy: [rebeccawebster@hockleyhomes.co.uk](mailto:rebeccawebster@hockleyhomes.co.uk)
- If you have questions about how we process your personal information, please get in touch.
- You have the right to make a complaint via the Information Commissioner's Office: <http://ico.org.uk/concerns>.
- It is important that the information we hold about you is accurate and current. Please notify us of any changes that need to be made.