

# PRIVACY NOTICE

## 1. Garrod Beckett & Company Limited Privacy Policy

This notice describes how Garrod Beckett & Company Limited collects and processes your personal data, 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').

It is important that you carefully read our policy to understand how our practice collects your personal data and how we will handle it. This policy is in addition to and does not replace or override any other policy/notices, and/or Garrod Beckett & Company Limited Terms and Conditions of business. Garrod Beckett & Company Limited takes the protection of your privacy very seriously. We will only use your personal information to deliver the services you have requested from us, and to meet our legal responsibilities.

## 2. About us

Garrod Beckett & Company Limited "a firm of chartered accountants" registered in England and Wales as a limited company under number: 237651747 with the registered office at 10 Town Quay Wharf, Abbey Road, Barking, Essex IG11 7BZ. For the purpose of 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 Data Protection Legislation to notify you of the information contained in this privacy notice. We have appointed a data protection manager. Our data protection manager 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 noted at paragraph 12 (contact us) below.

## 3. How we collect your personal data

We may use direct or indirect methods when collecting personal data about you.

We will collect information directly from you when you engage us to provide our services, request marketing material to be sent to you, or request information about our services or complete our enquiry forms.

We may indirectly collect information, whilst you interact with our website, downloading available contents or when subscribing to our newsletter.

## 4. The type of information we collect from you

The type of data or personal information we hold about you may vary depending on the services you have engaged us to deliver. The types of personal data, or personal information we may collect, use and store may include details such as:

- Identity data such as your name, maiden name, last name, username, date of birth and any other identifier details.
- Contact data such as address, telephone number, email address
- Details of any services you have received from us
- Details of our correspondence and communications with you
- Information about any complaint and enquiry you make to us
- Information from researcher, surveys, and marketing activities.
- General data such as details about your job and your financial circumstances, Unique Tax Reference (UTR) number, your National Insurance number and banking details.

## 5. How we use personal data we hold about you

We may process your personal data for the purposes necessary for the performance of our contract with our clients and comply with our legal obligations.

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 purpose of our own legitimate interest 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.

### **Situation in which we will use your personal data**

We may use your personal data in the following circumstances:

- To contact you by post, email or telephone
- To verify your identity where this is required
- To provide and improve our service to you and our clients
- To manage our relationship with you and our clients
- To maintain our records and fulfil our legal and regulatory obligations
- To process financial transactions
- To report financial transactions to HMRC and communicate with them as required
- To detect and prevent crime, fraud or corruption
- For any other legitimate business purposes

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 hold your personal data as long as it is necessary to fulfil any legal, accounting or any other regulatory requirements.

When determining the appropriate retention period 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.

To ensure compliance with all such requirements, it is the company's policy to retain all data for a minimum period of seven years from the end of the period concerned.

### **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.

## **6. Data Sharing**

### **Why might you share my personal data with third parties?**

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so. We do not sell or rent or make your data available to third parties. We will not share your information with third parties for marketing purposes. All our staff with access to your information has a duty of confidentiality under the professional ethical conduct which our company is required to follow.

### **Which third-party service providers process my personal data?**

“Third parties” includes third-party service providers and other entities within our group OR the members of our firm’s network which require the necessary information to deliver the services for which we were contracted. The following activities are carried out by third-party service providers: IT (and cloud) services, professional advisory services, administration services, marketing 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 or to otherwise comply with the law.

## **7. Transferring Personal Data Outside the European Economic Area (EEA)**

We will not transfer the personal data we collect about you outside of the EEA.

## **8. 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.

## **9. 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 email our data protection point of contact at [accountants@garrodbeckett.co.uk](mailto:accountants@garrodbeckett.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.

## 10. 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 at

[accountants@garrodbeckett.co.uk](mailto:accountants@garrodbeckett.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.

## 11. Changes to This Notice

We review our policies notice regularly and place any updates on our website at <https://www.garrodbeckett.co.uk/>. Paper copies of the privacy notice may also be obtained from us at the contact details below.

## 12. Contact information

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 or telephone our *Data Protection Point of Contact*. Full contact details are as follow:

Garrod Beckett and Company Limited  
 10 Town Quay Wharf  
 Abbey Road  
 Barking, Essex  
 IG11 7BZ  
 Tel 020 8591 2391  
 Email: [accountants@garrodbeckett.co.uk](mailto:accountants@garrodbeckett.co.uk)  
 Website: <https://www.garrodbeckett.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>