

IBC Accountants – GDPR Privacy Policy

IBC take the privacy and security of your personal data very seriously. In this privacy notice, we set out how we collect and use your personal data before, during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applied to all our current and former clients, employees, workers and contractors and it does not form part of any employment contract or any other services contract with us.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

The Principles of Data Protection

We will comply with data protection law including the 6 principles of GDPR which are:

- To process your personal data lawfully, fairly and in a transparent way
- To collect your personal data only for valid purposes that we have advised you about and to not use your personal data in any way that is incompatible with those purposes (unless we have notified you and explained the lawful ground that allows us to do so).
- To only process your personal data to the extent necessary for the purposes we have advised you about.
- To keep your personal data accurate and kept up to date.
- To keep your personal data only as long as necessary for the purposes we have told you about.
- To keep your personal data secure.

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;
- when you engage us to provide our services and also during the provision of those services;
- when 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, from background check providers, from HM Revenue & Customs or from Companies House).

The kind of information that we hold about you

The information we hold about you may include the following:

- your personal details and identification (such as copies of identification, your full name, date of birth, nationality, address, national insurance number, Unique Tax Payers reference, financial data and bank account details);
- special categories of personal data as defined in Data Protection Law;
- details of contact we have had with you in relation to the provision, or the proposed provision, of our services;
- details of any services you have received from us;
- our correspondence and communications with you;
- information about any complaints and enquiries you make to us;
- information from research, surveys, and marketing activities; or
- information we receive from other sources, such as publicly available information.

How we use personal data about you

We may process your personal data for purposes necessary for the performance of our contract with you, 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: in these limited circumstances where your consent is required for the processing of your personal data, 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 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 an employee, 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;
- liaising with third parties where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so (such as HMRC, Companies House, Credit Safe, your Pension Provider);
- carry out any legal obligations, HMRC possible investigations, prevent fraud or other legal disputes;
- if we manage payroll for you, we will hold personal data on your staff;
- 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.

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 contact us by using the contact details below.

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.

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 certain 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 intbusinesscentreibc@gmail.com. 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.

Data Protection Officer / Contact us

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice, 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 contact Alan Keeves via email intbusinesscentreibc@gmail.com or by telephone on 01634 564290.

This privacy notice was last updated on 07 January 2021.