

FIRM PRIVACY POLICY

Redford & Co 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.

Purpose of this notice

This privacy notice describes how we collect and use personal data about you, 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').

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

About us

Redford & Co Limited ("Redford & Co", "we", "us", "our" and "ours") is an accountancy and tax advisory firm. We are registered to carry out audit work in the UK and Ireland by the Institute of Chartered Accountants in England and Wales.

We are registered in England and Wales as a limited liability company under number 06064359 and our registered office is at 64 Baker Street, London W1U 7GB.

For the purpose of the 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 the Data Protection Legislation to notify you of the information contained in this privacy notice.

We have appointed Marcus Redford as our data protection officer and he is responsible for assisting with enquiries in relation to this privacy notice or our treatment of your personal data. Marcus Redford can be contacted at our above registered office address or on marcusredford@redford.co.uk or by calling 0207 224 2444.

How we may collect your personal data

We obtain information about you when you engage us to deliver our services, when you use our website, for example, when you contact us about our services, and from third parties and/or publicly available resources, for example, from Companies House.

The kind of information we hold about you

The personal information we collect from you will vary depending on which services you engage us to deliver. The personal information we collect might include your name, address, telephone number, email address, your Unique Tax Reference (UTR) number, your National Insurance number, bank account details, your IP address, which pages you may have visited on our website and when you accessed them.

How we use personal data we hold about you

In general terms, and depending on which services you engage us to deliver, as part of providing our agreed services we may use your information to:

- Contact you by post, email or telephone
- Verify your identity where this is required
- Understand your needs and how they may be met
- Maintain our records in accordance with applicable legal and regulatory obligations

- Process financial transactions
- Prevent and detect crime, fraud or corruption

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.

Marketing

We may use your personal information to tell you about relevant products and services that we think may be of interest to you. We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

You will receive marketing communications from us if you have requested information from us and unless you have opted out of receiving that marketing.

You can ask us to stop sending you marketing messages at any time by contacting us in any of the ways set out in "Contact Us" below.

Where you opt out of receiving these marketing messages, this will not apply to communications between us necessary to carry out any services required by you or any other important notice in relation to our service offering and changes to your existing services.

Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

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.

Data sharing

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 will not sell or rent your information to third parties and we will not share your information with third parties for marketing purposes.

Please be assured that we will not release your information to third parties unless you have requested that we do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention and detection of crime, fraud or corruption.

Any staff with access to your information have a duty of confidentiality under the ethical standards that this firm is required to follow.

Transferring personal data outside the European Economic Area (EEA)

We will only send your data outside of the European Economic Area (“EEA”):

- In accordance with your instructions.
- To comply with a legal obligation.
- To work with any agents or advisers who we may use to offer support services.

Whenever we transfer your personal data out of the EEA, we take steps to make sure the right security measures are taken so that your privacy rights continue to be protected as outlined in this policy.

Should you require further information about these protective measures, please contact us using the contact details outlined below.

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.

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 in any of the ways set out in “Contact Us” 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 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 contact us in any of the ways set out in “Contact Us” below.

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.

Changes to this notice

We keep our privacy notice under regular review and we will place any updates on our www.redford.co.uk.

This privacy notice was last updated on 21/8/18.

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 our data protection officer, Marcus Redford, on marcusredford@redford.co.uk or by calling 0207 224 2444. Alternatively, you can contact Jarnel Grewal on jarnelgrewal@redford.co.uk or by calling 0207 224 2444.

Complaints

We seek to resolve directly all complaints about how we handle your personal information but 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>