

At Abtax CA Limited, we take the issue of your Privacy very seriously. Which is why we work hard to ensure we have policies and procedures in place to not only help your business, but to do so in a way which is respectful to your rights. The following privacy policy notice explains what personal data we collect from you, or that you provide to us, how we process it, who we may share data with, email updates and marketing news we may send to you. This notice also explains how we do this and tells you about your privacy rights and how the law protects you.

Our Commitment to Data Privacy

We, at Abtax CA, believe in and are fully committed to respect the privacy of our customers. The personal data you share with us is given on trust and is a privilege we take seriously. As such we are committed to compliance with the General Data Protection Regulations (GDPR), which comes into effect on May 25, 2018. The regulation contains the most significant changes to European data privacy legislation in the last 20 years, and we have been working hard to ensure that we are evolving with these developments.

We do not sell you personal data and we let you decide how to receive our news and marketing information.

We act as data controller as well as data processor. For the purpose of data protection legislation, Abtax CA Limited, The Joiners Shop, The Historic Dockyard, Chatham, Kent, ME4 4TZ is the data controller and data processor.

Who we are and what we do

We are a Chartered Certified Accountants.

Our offices are located at the following address: Abtax CA Limited, The Joiners Shop,

The Historic Dockyard, Chatham, Kent, ME4 4TZ

You can find out more about us at: www.abtax.co.uk

If you have any questions or want more details about how we use your personal information, you can ask us by contacting us via post, email at <u>info@abtax.co.uk</u> or phone on +441795 435 155.

How we use your data and your legal protection

Your privacy is protected by law. This section explains how that works. Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Abtax CA Limited

The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it



Purpose of processing and the legal basis for processing

A legitimate interest is when we have a business reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell youwhat that is.

Below is a list of all the ways that we may use your personal information as charted accountants and tax advisors, and which of the reasons we rely on to do so.

What we use your personal information for	Our reasons	Our legitimate interests
Tax Returns / Consultancy Personal Sole Trader / Company Company Secretarial Accounts Self Employed Rental Business Payroll VAT Other Activities National Insurance Tax Investigations Website Marketing News updates	 Your consent Fulfilling engagement letters & standard terms of businesses Money laundering regulations Our legitimate interests Our legal duty Professional indemnityinsurance Financial promotions Dealing with HMRC 	 Keeping records up to date. Seeking consent when weneed to contact you. Complying with regulations that apply to us. Improving how we deal with financial crime, as well as doing our legal duties in this respect. Being efficient about how we fulfil our legal and contractual duties.
• To provide advice or guidance a	ur clients' needs and to grow our busi about our services ther companies that provide services ervices	

- To collect and recover debts that is owed to us
- To respond to complaints and seek to resolve them
- To exercise our rights set out in agreements or contracts



Grouping personal information

We may use different kinds of personal information and group them together like this

Type of personal information	Description
Financial	Completion of tax returns, accounts etc.
Contact	Where you live and how to contact you
Socio-Demographic	This includes details about your work or profession, nationality etc.
Transactional	Details of your income, expenses, benefits, investments etc. when compiling tax returns, accounts, etc.
Contractual	Details about the products or services we provide to you.
Locational	Data we get about where you are for tax & accounting purposes
Communications	What we learn about you from letters, emails and conversations between us.
Social Relationships	Your family, friends and other relationships
Open Data and Public Records	Details about you that are in public records, such as companies house
Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, drivers licence or birth certificate i.e. money laundering checks
Special types of data	 The law and other regulations treat some types of personal information as special. We will only collect and use these types of data for tax purposes: Racial or ethnic origin Trade union membership Health data including gender Criminal convictions and offences
Consents	Any permissions, consents or preferences that you give us. This includes things like how you want us to contact you, how you wish us to send compliance etc.



National Identifier	A number or code given to you by a government to	
	identify who you are, such as a National Insurance	
	number, UTR	

Where we collect personal information from

We may collect personal data information from you, your business, other companies you may have dealt with etc. in order to fulfil our services we conduct on your behalf.

Data you give us:

- When you enlist for one of our services
- · When you use our website. Please see our website and Cookies policy: www.abtax.com
- · Communication via telephone, emails and letters
- At events

Data we collect when you use our services:

- Profile and usage data: this includes when setting you up as a client to identify you when enlist in one of our services
- Income, expenses, benefits, investments
- Payment information

Data from third parties:

- Banks
- Financial advisors
- Previous accountants
- Social networks and internet searches
- Lawyers and solicitors
- Public information such as companies house
- · Companies that introduce you to us
- Agents working on your behalf
- Government and law enforcement agencies

Who we share your personal information with

- Yourself, (spouse, issue, other family member or relative etc. with your consent)
- Businesses i.e. the individuals own company, assistants, PA's
- Our website
- Successor accountants
- Banks
- Remote partner outside of the UK
- Financial advisors/institutes
- HMRC and other government regulators and authorities



- Fraud prevention agencies
- Credit reference agencies
- Lawyers and solicitors
- · Companies that introduce you to us i.e. property management companies
- Companies we have a joint venture or agreement to co-operate with
- Companies that we introduce you to
- Companies you ask us to share your data with

How we use your information to make automated decisions

We sometimes make decisions based on the information we have. This helps improve the efficiency of our services we conduct on your behalf based on what we know. Any major decisions we will contact you for your consent before proceeding.

Here are some examples of automated decisions we make:

- Correcting PAYE coding notices
- Obtaining rental agent statements
- Obtaining pensions and financial investments for completion of tax returns
- Reducing tax payments on account
- National insurance deferment or overpayment
- Money laundering checks

Fraud Prevention Agencies (FPAs)

We need to confirm your identity before we provide our services to you or your business. Once you have become a client of ours, we will also share your personal information as needed to help detect fraud and money-laundering risks. We may use Fraud Prevention Agencies to help us with this.

Both we and fraud prevention agencies can only use your personal information if we have a proper reason to do so. It must be needed either for us to obey the law, or for a 'legitimate interest'.

A legitimate interest is when we have a business or commercial reason to use your information. This must not unfairly go against what is right and best for you.

We will use the information to:

- Confirm identities.
- Help prevent fraud and money-laundering.
- Fulfil any contracts you or your business has with us.

We or an FPA may allow law enforcement agencies to access your personal information. This is to support their duty to detect, investigate, prevent, and prosecute crime.

FPA's can keep personal information for different lengths of time. They can keep your data for up to six years if they find a risk of fraud or money-laundering.



Sending data outside of the EEA

We will not send your data outside of the European Economic Area ('EEA')

If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you. If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform our services to you. Any data collection that is optional would be made clear at the point of collection.

How long we keep your personal information

We will not hold your data longer than necessary unless we have been given specific instructions by the individual or we feel required for professional indemnity.

In the event that you are no longer a client, please specifically advise us if you wish to be removed from our media contact or newsletters.

How to get a copy of your personal information

You can access your personal information we hold by contacting the admin team by phone, email or post.

Letting us know if your personal information is incorrect

If you think the information we hold about you is incorrect or needs updating, please do not hesitate to contact us. We will take reasonable steps to check its accuracy and correct it.

What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

Please contact us if you object how we use your data or ask us to delete it or restrict how we use it.

How to complain

You also have the right to complain to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <u>https://ico.org.uk/</u>

Contact

We hope that we have shared with you all the information you need, but if we haven't, or if you have any questions then please do not hesitate to contact us at: <u>info@abtax.co.uk</u>.