



## Privacy Policy (GDPR)

Under UK Data Protection law, we are required to explain what personal data we collect and what we do with it.

We are naturally encouraged to keep our privacy statement concise and in plain English

### **Blog Posts & Newsletters**

We have issued blog post notifications and newsletters for subscribers to our e-mailing list over the last few years.

From the outset this has been on an “opt in” basis. The data is kept in a separate package from all other personal data and has never been and will never be used for anything other than sending out blog post notifications and newsletters.

For the avoidance of doubt, every subscriber to our emailing list has been invited to “opt-in” for a second time immediately prior to 25 May 2018 to continue receiving updates. Subscribers may “opt out” at any time.

This is the only information we use for marketing purposes. We share it with no-one (except the Information Commissioners should they wish to see it).

### **LinkedIn**

Social media is exempt from GDPR. We do not, however, in any way ‘manage’ any information “collected”. We do not use it for separate campaigns of any sort. We only share opinion and articles and refer to our blog posts. We do not knowingly share personal information with anyone.

### **Twitter**

Social media is exempt from GDPR. We do not, however, in any way ‘manage’ any information “collected”. We do not use it for separate campaigns of any sort. We only share opinion and articles and refer to our blog posts. We do not knowingly share personal information with anyone.

### **Anti-money laundering (AML)**

AML requirements are exempt from GDPR. We collect information on all clients, and we keep it up to date, as we are required to do by law. We are required to keep a record of the information and maintain a classification as to the risk we think that our individual client represents in accordance with the AML legal requirements.

We are required by law to keep the information confidential, which we do. However, we are supervised by the Chartered Institute of Taxation (CIOT) for anti-money laundering purposes,

and we may be required to show CIOT the records we keep. It is also possible that the National Crime Agency may seek access to the records. We do not share the information with anyone else.

## **The General Data Protection Regulation (GDPR)**

We are required by law to maintain records for GDPR purposes. The key content, apart from some personal data, is a clients acceptance of our privacy policy. This acceptance is indicated by the signing of the contract between us (the engagement letter).

We believe that the lawful and correct treatment of personal information is critical to our success.

## **Our clients**

Communication between us and our clients is confidential, and we take all reasonable steps to keep all client information confidential except where we are required to disclose it by law, by regulatory bodies, by our insurers or as part of an external peer review. Unless we are authorised by clients to disclose information on their behalf this undertaking applies during and after our engagement.

We may, on occasion, subcontract work on your affairs to other professionals or seek counsel's opinion. The subcontractors and counsel will be bound by our client confidentiality terms.

## **Clients – Data Protection law and the collection of personal data**

We confirm that we comply with the provisions of the UK Data Protection legislation when processing personal data about clients and their families. In order to carry out our services to our clients and for related purposes such as updating and enhancing our client records, analysis for management purposes and statutory returns, legal and regulatory compliance and crime prevention we may obtain, process, use and disclose personal data about clients.

We gather personal data on our clients such as is necessary to comply with anti-money laundering legislation, professional rules and regulations, for contractual purposes, our own business purposes (principally to prepare and issue our fee notes) and for the work which we do. Tax assignments and related work involves having access to clients personal data – we cannot do the work clients engage us to undertake without it. However, we only use that data for the work clients have asked us to do.

We will only retain 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 personal data, the purposes for which we process personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **How you can access and update your information**

Keeping client information up to date and accurate is important to us. We commit to regularly review and correct where necessary, the information that we hold about clients. If any information changes, clients should please email or write to us promptly.

## **How we collect information and where we store it**

In the main we work on screen in a password protected environment and, where it is available, using encrypted packages.

Where we can we collect information electronically we do so. Scanned and electronic information is retained and backed up using password protected and, where possible, encrypted environments. Where information is retained and backed up "in the cloud" it is done so in environments which we are assured are both secure and GDPR compliant. We constantly review online security.

Any hard copies of information and documents are retained securely.

Where third parties are involved, we are assured that these environments are both secure and GDPR compliant.

## **Who else has access to your data?**

Where we act for clients in tax compliance matters our client data may be shared with HM Revenue & Customs. In principle the Chartered Institute of Taxation as our money laundering supervisor could see some of it, and the Information Commissioners Office could see some of it. If either body requests access to client data we will take advice before releasing information.

We will only disclose clients personal information where we are required to disclose it by law, by regulatory bodies, by our insurers or as part of an external peer review.

## **Your rights**

Access to information - Clients have the right to request a copy of the personal information that we hold.

Correcting information - We want to make sure that personal information is accurate, complete and up to date and clients may ask us to correct any personal information about them that they believe does not meet these standards.

Deletion of information - Clients have the right to ask us to delete personal information where:

- they consider that we no longer require the information for the purposes for which it was obtained
- they have validly objected to our use of their personal information – see 'Objecting to how we may use information' below
- our use of their personal information is contrary to law or our other legal obligations
- we are using client information with client consent and consent is withdrawn – see 'withdrawing consent to use your information' below.

Restricting how we may use information - In some cases, clients may ask us to restrict how we use their personal information. This right might apply, for example, where we are checking the accuracy of personal information that we hold or assessing the validity of any objection made to our use of information. The right might also apply where there is no longer a basis for using personal information but a client does not want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with client consent, for legal claims or where there are other public interest grounds to do so.

Objecting to how we may use information - Where we use personal information to perform tasks carried out in the public interest then, if a client asks us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

Withdrawing consent to use your information - Where we use personal information with client consent, that consent may be withdrawn at any time and we will stop using that personal information for the purpose(s) for which consent was given.

Please contact us in any of the ways set out in 'Contact information' below if you wish to exercise any of these rights.

### **Contact for Data Protection Purposes**

Stephen Parnham CTA, ATT, TEP  
Stephen Parnham Taxation Limited  
PO Box 1154  
Woodmancote  
Cheltenham  
GL50 9RP  
Email: [sp@stephenparnhamtaxation.com](mailto:sp@stephenparnhamtaxation.com)  
Phone: 07795945140

### **Clarification**

If you believe that we have omitted anything, or that something requires clarification, please contact us and we will address it promptly.

### **Overview**

As a firm of tax consultants, privacy has always been crucial to us and client confidentiality has always been at the heart of our contract with clients.

We do not disclose to anyone who our clients are, other than when we are required to by law. We do not use clients' information in any form of sales or marketing material.

June 2018