

# PRIVACY POLICY - TOTAL BOOKKEEPING

# <u>May 2018</u>

## The data we hold

The data we hold about you and your organisation are shown below (not all of these items will be applicable, but the list is restricted to these items)

- Full Name
- Home address
- Business address
- Telephone numbers
- Email addreses
- Date of Birth
- National Insurance Number
- Unique Tax Payer Reference
- Employer details
- VAT Registration Number
- Companies House Registration number
- Companies House Authentication code
- Partnership UTR
- Accounts Office Reference number
- Payroll information:
  - o Employee names
  - Employee Date of Births
  - Employee Home addresses
  - o Employee National Insurance Number
  - Employee Pay Data
  - Subcontractor details
- Passport Number
- Driving License Number
- Business logo and name
- Bank Details
- Supplier Details
- Pension provider information





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#### How we use your data

We use the data in order to prepare official returns for government organisations – namely HMRC. We use the data to verify your identity under Anti Money Laundering Laws using an online system that accesses police and other government databases which store information on births, deaths and crime.

We use the data to process your financial records using a cloud based bookkeeping package and payroll is processed using data that is backed up on our own network.

The data is not used for any other purpose.

### How we store your data

Your data is stored using Google cloud who are compliant with GDPR regulations. Computers are accessed using a unique username and password. Computers are the property of Total Bookkeeping and records are not accessed using public computers or unsecured WIFI.

External storage is encrypted so that data cannot be accessed by anyone other than the partners. Data communicated to you using email will not contain all of the personal information above. Items that contain the data, which could be used to identify you, will be sent to you using secure file transfer software, or via encrypted, password-protected email.

Paper records are stored in locked offices.

We retain the data in the manner above as long as you remain our client, in line with legal regulations (6 years). If you cease to be our client, we will retain the information in line with those regulations, after which is it erased.

#### Access to your data

Under GDPR, you have the right to obtain confirmation that your data is being processed and access to your personal data.

You can request a copy of the information free of charge. However, we can charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive. We will charge a reasonable fee to comply with requests for further copies of the same information.





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The fee is based on the administrative cost of providing the information.

Information will be provided without delay and at the latest within one month of receipt.

We can extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, we will inform you within one month of the receipt of the request and explain why the extension is necessary.

## Right to rectification

You are entitled to have personal data rectified if it is inaccurate or incomplete.

If we have disclosed the personal data in question to others, we will contact each recipient and inform them of the rectification - unless this proves impossible or involves disproportionate effort. We will inform you about these recipients.

We will respond to you within one month, this can be extended by two months where the request for rectification is complex.

Where we are not taking action in response to a request for rectification, we must explain why, and inform you of your right to complain to the supervisory authority and to a judicial remedy.

## Right to erasure

The right to erasure is also known as 'the right to be forgotten'. The broad principle underpinning this right is to enable you to request the deletion or removal of personal data where there is no compelling reason for its continued processing.

The right to erasure does not provide an absolute 'right to be forgotten'. You have a right to have personal data erased and to prevent processing in specific circumstances:

- where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed;
- where you withdraw consent; when you object to the processing and there is no overriding legitimate interest for continuing the processing;
- where your personal data was unlawfully processed (i.e. otherwise in breach of the GDPR);
- $\circ$   $\,$  where your personal data has to be erased in order to comply with a legal obligation or





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 $\circ$   $\;$  where personal data is processed in relation to the offer of information society services to a child.

## Right to restrict processing

You have a right to 'block' or suppress processing of personal data. When processing is restricted, we are permitted to store the personal data, but not further process it.

We can retain just enough information about you to ensure that the restriction is respected in future.

Where you contest the accuracy of the personal data, we will restrict the processing until we have verified the accuracy of the personal data.

### Right to data portability

The right to data portability allows you to obtain and reuse your personal data for your own purposes across different services.

The right to data portability only applies to personal data you have provided to us; where the processing is based on your consent or for the performance of a contract; and when processing is carried out by automated means.

## Changes to the information

We regularly review and, where necessary, update our privacy information.

If we plan to use personal data for a new purpose, we update our privacy information and communicate the changes to individuals before starting any new processing.

I accept the terms of the privacy policy.

Name (Print)	Position in Company	Signature	Date



