

PRIVACY NOTICE

What is the purpose of this notice?

To describe how we collect and use personal data about you in accordance with the General Data Protection Regulation (GDPR).

What we need

Hollingdale Pooley will be what's known as the "Controller" of the personal data you provide to us. We only collect basic personal data about you which does not include any special categories of personal information about you (known as Special Category Data). This does however include name, address, e-mail, telephone number, date of birth, National Insurance numbers, personal unique taxpayer reference, gender, financial information required for the work to be undertaken.

If this data relates to a child under the age of 13 then the permission of whoever holds parental responsibility for the child will be obtained.

Why we need it

We need to know your basic personal data in order to provide the service we have agreed to provide covered in our engagement letter and agreed between us. We will not collect any personal data from you we do not need, to provide and oversee this service to you.

What we do with it

We only ever use your personal data with your consent, or where it is necessary:

- to enter into, or perform, a contract with you
- to comply with a legal duty in the course of our work for you e.g. complying with HMRC, Companies House, money laundering checks, etc.
- to protect your vital interests
- for our own (or a third party's) lawful interests, provided your rights don't override these.

In any event, we will only use your information for the purpose or purposes it was collected for (or for closely related purposes).

We may process personal information for certain legitimate business purposes, which include some or all of the following:

- where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our clients
- to carry out money laundering checks
- to identify and prevent fraud
- to enhance the security of our network and information systems
- to better understand how people interact with our website
- to provide email and postal communications which we think will be of interest to you

Whenever we process data for these purposes we will ensure that we always keep your personal data rights in high regard and take account of these rights at all times.

When we process your personal data for our legitimate interests, we will make sure that we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate business interests do not automatically override your interests - we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You have the right to object to this processing if you wish, and if you wish to do so please contact Tanya Stratton, tanya@hollingdalepooley.co.uk, our Data Compliance Manager. Please bear in mind that if you object this may affect our ability to carry out tasks above for your benefit.

We use the services of a credit reference agency, TransUnion (formerly CallCredit) to carry out our money laundering checks. TransUnion has its own TransUnion Bureau Privacy Notice which explains how they use and share personal information, the type of information they hold, where it comes from and the legalities of how it is handled.

The notice can be found at the following address:

<https://www.callcredit.co.uk/legal-information/bureau-privacy-notice>

Where we keep it

We are based in the UK and we store our data within the EU. Some organisations which provide services to us may transfer personal data outside of the EU, but we will only allow them to do if your data is adequately protected.

For example, some of our systems use Microsoft products. As a US company, it may be that using their products result in personal data being transferred to or accessible from the US. However, we will allow this as we are certain personal data will still be adequately protected (as Microsoft is certified under the USA's Privacy Shield scheme).

How long we keep it

We will only use and store information for so long as it is required for the purposes it was collected for. How long information will be stored depends on the information in question and what it is being used for. For example, if you ask us not to send you marketing e-mails, we will stop storing your e-mails for marketing purposes (though we will keep a record of your preference not to be e-mailed).

We continually review what information we hold and delete what is no longer required. We will not retain your data for any longer than necessary. The longest time that we will hold your data will be six years, but in some instances it is necessary to keep data for extended periods for legal and/or regulatory requirements.

Receiving our newsletter

If you would like us to send you our weekly e-newsletter then you need to register on our website. This information is not shared with third parties and you can unsubscribe at any time via phone, e-mail or on our website.

What are your rights?

We want to ensure that you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- the right to confirmation as to whether we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as a data subject access request)
- the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason)
- the right to have inaccurate data rectified
- the right to object to your data being used for marketing or profiling; and
- where technically feasible, you have the right to personal data you have provided to us which we process automatically based on your consent or the performance of a contract. This information will be provided in a common electronic format.

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you wish to raise a complaint on how we have handled your personal data, you can contact Tanya Stratton, tanya@hollingdalepooley.co.uk, our Data Compliance Manager who will investigate the matter.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office, the UK supervisory authority for data protection issues.