

PRIVACY POLICY

We take your privacy very seriously, this policy explains how we collect, store, use and share your personal information. It also explains your rights in relation to personal information and that we are subject to the General Data Protection Regulation 2018, which apply across the European Union including the UK.

Key terms used in this policy:

Personal data	information about a natural person that makes you identifiable which may include but is not limited to: name and contact information, national insurance number, employment history, employee number, credit history, personal tax, payroll and accounting data. Details of contact we have had with you in relation to the proposed provision of our services. Information about any complaints and enquiries you make to us. Information from research, surveys and marketing activities. Information we receive from other sources such as Companies House, HMRC etc.
Sensitive personal data	refers to the above but includes genetic and biometric data including: medical, religious or philosophical beliefs and political opinion, racial or ethnic origin, convictions, biometric data (eg photo in an electronic passport)
We, us, our	Rawlence & Browne Limited
Data controller	the person or organisation who decides the purposes for which and the way in which any personal data is processed – Rawlence & Browne Limited
Data processing	operation performed upon personal data, automated or manual including collecting, recording, organising, storing, adapting, retrieving, using, disclosing by transmission, disseminating or making available, aligning or combining, restricting, erasure or destruction.

PERSONAL INFORMATION WE COLLECT ABOUT YOU

You agree that we may collect and use the information required to enable us to discharge the services (as defined in our letter/s of engagement and supporting schedules/terms of business) and for other related purposes including: updating client records, statutory returns, legal and regulatory compliance, crime prevention.

We obtain this information from you by way of: website enquiry, email, letter, completion of checklists, client information forms, over the phone. We will not collect any personal data from you that we do not need to complete these services.

Website usage information is collected using cookies. A cookie is a small text file stored in your computer containing text data. We use cookies for certain functions to improve the usability of the website. These cookies do not contain any personal information about you. However, enabling cookies in your web browser is necessary if you wish your selections to be remembered for future visits on the same computer. Most web browsers allow some control of most cookies through the browser settings. For more information about cookies and instructions on how to adjust your browser settings to restrict or disable cookies, see the IAB website at www.allaboutcookies.org

We use Google Analytics to help analyse how visitors use our website. This is a third-party information storage system using cookies to store information, such as what time the current visit occurred, whether the visitor has been to the site before, and what site referred the visitor to the web page. A different cookie is used for each website, and visitors are not tracked across multiple sites. The information generated by the cookie about your use of the website (including IP address) is transmitted to Google. This information may then be used to evaluate visitors' use of the website

and to compile statistical reports on website activity for Rawlence & Browne Limited. More information on how Google uses this data can be found at <https://policies.google.com/technologies/partner-sites> To disable this type of cookie, some browsers will indicate when a cookie is being sent and allow you to decline cookies on a case-by-case basis. In addition to declining cookies, you can also install the Google Analytics Opt-out Add-on in your browser, which prevents Google Analytics from collecting information about your website visits.

We will never (and will not allow any third party to) use the statistical analytics tool to track or to collect any personally identifiable information (PII) of visitors to our site. Google will not associate your IP address with any other data held by Google. Neither we nor Google will link, or seek to link, an IP address with the identity of a computer user. We will not associate any data gathered from this site with any personally identifiable information from any source, unless you explicitly submit that information via a fill-in form on our website.

The terms of, and the use of, our website shall be governed by English law. This privacy policy only applies to the Rawlence & Browne Limited website so if linking, via our website, to other websites ie facebook, twitter, linked-in etc you should read their privacy policies.

HOW YOUR PERSONAL INFORMATION IS USED

We will use any personal information you have given to provide the services you have requested from us, as detailed in letter/s of engagement and supporting schedule/s, and to keep you informed of any changes to that information. We will only use this information subject to your instructions, data protection law and our duty of confidentiality.

If you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered with you. Alternatively we may be unable to comply with our legal or regulatory obligations.

For business to business clients and contacts our lawful reason for processing your personal information will be “legitimate interests”. Under “legitimate interests” we can process your personal information if: we have a genuine and legitimate reason and we are not harming any of your rights and interests.

For business to consumer clients and contacts our lawful reason for processing your personal information will be “a contract with the individual” eg to supply services you have requested, or to fulfil obligations under an employment contract. This also includes steps taken at your request before entering into a contract.

We may receive personal data from you for the purposes of our money laundering checks, such as a copy of your passport. This data will only be processed for the purposes of preventing money laundering and terrorist financing. We may also, however, process your data without your knowledge or consent, in accordance with this notice, where we are legally required to do so.

Our work for you may require us to pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing the services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the services and we have contracts in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

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

- where the process enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our customers
- to identify and prevent fraud
- to enhance the security of our network and information systems
- to better understand how people interact with our websites
- to provide postal communications which we think will be of interest to you
- to determine the effectiveness of promotional campaigns and advertising

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. You have the right to object to this processing if you wish, and if you wish to do so contact us on office@rawlenceandbrowne.co.uk please bear in mind that if you object this may affect our ability to carry out tasks above for your benefit.

We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with the law.

We will not share your information for marketing purposes with companies so that they may offer you their products and services.

KEEPING YOUR PERSONAL INFORMATION SECURE

We take steps to make sure your personal information is securely treated. Non-sensitive details (your email address etc) are normally sent over the internet and this can never be guaranteed to be 100% secure. While we strive to protect your personal information we cannot guarantee the security of any information you transmit to us and you do so at your own risk. Once we receive your information we make our best effort to ensure its security on our system. We encourage data to be communicated via Iris Openspace requiring a password, you are responsible for keeping passwords confidential and we ask you not to share your password with anyone. When you are on a secure page a lock icon will appear on the bottom of web browsers.

HOW LONG WILL WE HOLD YOUR DATA FOR

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected. When assessing what retention period is appropriate for your personal data, we take into consideration:

- the requirements of our business and the services provided
- any statutory or legal obligations
- the purposes for which we originally collected the personal data
- the lawful grounds on which we based our processing
- the types of personal data we have collected
- the amount and categories of your personal data
- whether the purpose of the processing could reasonably be fulfilled by other means.

It is normal practice to hold data for seven years, in line with our regulatory 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.

TRANSFERRING YOUR INFORMATION OUTSIDE OF THE EEA

We do not share or transfer information about you outside of Europe. If, however, you use our services while you are outside the EU, your information may be transferred outside the EU to give you those services

YOUR RIGHTS

Access	the right to be provided with a copy of your personal information (the right of access)
Rectification	the right to require us to correct any mistakes in your personal information
To be forgotten	the right to require us to delete your personal information – in certain circumstances
Restriction of processing	the right to require us to restrict processing of your personal information – in certain circumstances
Data portability	the right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party – in certain situations.
To object	the right to object to the processing of your personal data if you feel the “ground relating to your particular situation” apply. The only reasons we will be able to deny your request is if we can show compelling legitimate grounds for the processing, which override your interest, rights and freedoms, or the processing is for the establishment, exercise or defence of a legal claims.

For further information regarding these rights, including the circumstances in which they apply, please contact us, or refer to the guidance from the UK Information Commissioner’s Office (ICO) on individual rights under the General Data Protection Regulation.

Should you wish to exercise any of these rights please:

email office@rawlenceandbrowne.co.uk

or

write to 17 Sarum Business Park, Lancaster Road, Old Sarum, Salisbury SP4 6FB

COMPLAINTS

Should you have any queries regarding the use of your information please email or write to us, as shown above, we hope we can resolve any concerns that you may have, however, you have the right to lodge a complaint with a supervisory authority, in the UK this is the Information Commissioner’s Office <https://ico.org.uk/concerns>.

CHANGES TO OUR PRIVACY POLICY

We regularly review our privacy policy this was last updated on 21 May 2018, we may make changes to this policy from time to time, when we do we will inform you via our website.

HOW TO CONTACT US

Please contact us if you have any questions about our privacy policy or information we hold about you:

email office@rawlenceandbrowne.co.uk

write to 17 Sarum Business Park, Lancaster Road, Old Sarum, Salisbury SP4 6FB