



# Halsey & Co.

— Since 1952 —

Chartered Certified Accountants  
Registered Auditors

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## **DATA PROTECTION AND PRIVACY POLICY**

### **Use of client data**

We are committed to protecting your personal data in accordance with the Data Protection Act 2018 (DPA 2018) and the General Data Protection Regulations (GDPR).

We process personal data for several purposes and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

Our policy is to collect only the personal data necessary for agreed purposes and we ask clients to only share personal data where it is strictly needed for those purposes. We collect personal data from our clients or from third parties acting on the instructions of the relevant client.

We process personal data to provide professional services such as tax advice, general or specific business advice as part of the range of services we offer. We also process personal data in the administration and management of our business.

Your business contact details are used to provide you with information about our services and other information which we think will be of interest to you, unless you tell us not to.

We are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

Personal data processed is kept by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). In the absence of specific legal, regulatory or contractual requirements, our retention policy period for records and other documentary evidence created in the provision of services is 7 years.

We take the security of your data we hold seriously. We have a policy including procedures and training in place covering data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect your data. We use third parties located in other countries to help us run our business. As a result, personal data may be transferred outside the countries where we and our clients are located. This includes countries outside the European Union ("EU").

Under the DPA (2018) and GDPR, Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights.

Halsey & Co generally use & store client information internally. However there are one or two exceptions to this which we outline as follows:



1) *Storage of documents*

We retain current client papers and books on site. Older client documents/papers are stored at a secure, well-known off site storage facility.

2) *Secure Destruction of client documents*

After the relevant statutory timescale has passed in which documents must be retained, we utilise accredited document destruction companies who collect client documents and securely destroy them offsite, providing a certificate that they have done so.

3) *Work carried out on Electronic data “in the cloud”*

For clients where book-keeping is carried out regularly, in order to process the data on a timely basis we sometimes need more resources so utilise data processors to process and reconcile the data input into Xero and other third party add software, which are carried on outside of the EU. These systems are highly secured and password protected. Our data processors are also chartered accountants regulated by a professional body having the same ethical standards as in the UK. All documents are transmitted securely and access is regulated via password protected entry at all times.

4) *Provision of basic client information to practice insurers*

Each year, we are obliged to present a client list to our practice insurers who insure us for tax enquiry costs for clients who have opted in. As part of this, we are required to provide your name and contact address and basis information as to what type of client you are, to the insurer. They will then contact you on our letterhead inviting you to either renew, accept or decline cover with us.

### **Access to data**

You have a right to access your personal data held by us and you can exercise that right by contacting us below. Our aim is to respond a request promptly and within the legally required limit of 40 days.

### **Update of personal data**

If you wish to update personal data submitted to us, please contact us below. Once we are informed that any personal data held by us is no longer accurate we will make changes based on your updated information.

### **Client Communications**

We will communicate with you for the services you have requested but also to provide you with relevant updates such as budget updates etc. Note - **not** third party newsletters but tailored communications from ourselves.

You may also receive communications in relation to our optional Tax enquiry fee protection service which are processed and sent on our behalf but directly from our insurer. On occasions, we will also communicate with clients to highlight services or functions that we provide or which we feel are relevant to assist clients.

We will continue to do so for clients who have previously received such communications on the basis of prior consent, but also on the basis of recital 47 GDPR that the processing of data for such purposes is regarded as carried out for a legitimate interest.

### **Withdrawal of Consent**

Notwithstanding this, you are reminded that you can opt out/ withdraw consent at any time by writing to us at our postal address on the letterhead, or emailing [info@halseyandco.co.uk](mailto:info@halseyandco.co.uk) or your regular contact and stating clearly that you wish to do so.

## **Routine Correspondence**

Beyond that, we will communicate with HMRC, Companies House and other statutory bodies, on your behalf and in a secure manner at all times. We generally utilise electronic filing and two stage authentication where possible. We will only send data required by law, in order to keep you up to date and compliant with your obligations.

## **Electronic Approval**

The quickest and most secure way to deal with client approval to confidential documents is to obtain electronic signatures to documents securely held online in a dedicated client folder.

## **Other rights**

This statement is intended to provide information about what personal data we collect about you and how it is used. As well as rights of access and amendment referred to above, individuals may have other rights in relation to the personal data we hold, such as a right to erasure/deletion, to restrict or object to our processing of personal data and the right to data portability. For further information on these rights please contact us below.

For further information on each of those rights, including the circumstances in which they apply, see the <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

## **Complaints**

If you do want to complain about our use of your personal data, please contact us below with the details of your complaint. You also have the right to register a complaint with the Information Commissioner's Office ("ICO"). For further information on your rights and how to complain to the ICO, please refer to their website.

## **Contacting us about your data**

If you have any questions about this privacy statement or how and why we process personal data, please contact Richard Halsey at the address shown on our letterhead or at [richard@halseyandco.co.uk](mailto:richard@halseyandco.co.uk).