

## **FAIR PROCESSING AND PRIVACY NOTICE**

### **Who we are**

This is the privacy statement of **Henderson Black & Co, Chartered Accountants**. We are registered as a data controller with the Information Commissioner's Office registration number Z9271026. Our Data Protection contact is Robin Winter, Edenbank House, 22 Crossgate, Cupar, KY15 5HW.

This privacy statement explains how we collect and use personal information about you. We are committed to ensuring that your privacy is protected. Any personal data provided to us by you or by a third party shall only be used in accordance with this notice. Your data will be processed securely and in compliance with data protection law.

We may update this notice from time to time by updating the terms on our website [[www.hendersonblack.co.uk](http://www.hendersonblack.co.uk)]. You should check the website from time to time. This policy is effective from 1 May 2018.

### **What personal information we collect**

We collect information to enable us to provide accounting, auditing, taxation and related services and to maintain our own accounts and records. To allow us to perform these functions, we may collect:

- Personal details
- Family, lifestyle and social circumstances,
- Goods and services
- Financial details

### **Where we collect personal information from**

We obtain information from you, from others with your agreement and from publicly available sources.

### **How we use your personal information**

- Deliver services and meet legal responsibilities
- Verify identity where this is required
- Communication by post, email or telephone
- Understand needs and how they may be met
- Maintain records
- Process financial transactions
- Prevent and detect crime, fraud or corruption

We would also like to be able to use your contact details to send you information about our events, products and services. If you do not want us to contact you in this way, please contact the partner dealing with your affairs. We will still use your contact details to contact you in relation to the service that we are providing to you.

### **Who we share your personal information with**

We sometimes need to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary we are required to comply with all aspects of the GDPR. What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons. Where necessary or required we share information with:

- Business associates and professional advisers

- Family, associates and representatives of the person whose personal data we are processing
- Suppliers
- Local and central government
- Financial organisations
- Ombudsmen and regulatory authorities
- Credit reference and debt collection agencies
- Healthcare professionals, social and welfare organisations
- Current, past or prospective employers
- Examining bodies
- Service providers

### **How long we retain your personal information for**

We will keep your personal data for seven years as long as you remain a client. If you cease to be a client then we will retain the information for two years after you cease to be a client. We may keep information for a longer period if it is needed to provide our services or retention is for your benefit.

### **Holding personal information outside the EEA**

We do not intend to hold data outside the EEA, apart from any data held on cloud storage where appropriate. We may transfer data to other parties including:

- Cloud provider
- Document storage company
- Document disposal company

When we use any contractor to process your personal data, we ensure that they have entered into a binding legal contract with us ensuring that they will only process your data on our written instruction and in accordance with appropriate security provisions.

If it is necessary to transfer your personal data to a country outwith the EEA then we will not do so without having the appropriate safeguards in place and we will advise you of any such transfer taking place.

### **Your rights**

**Access to your information** – You have the right to request a copy of the personal information about you that we hold.

**Correcting your information** – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

**Deletion of your information** – You have the right to ask us to delete personal information about you where:

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

**Objecting to how we may use your information** – You have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

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

**Automated processing** – If we use your personal information on an automated basis to make decisions which significantly affect you, you have the right to ask that the decision be reviewed by an individual to whom you may make representations and contest the decision. This right only applies where we use your information with your consent or as part of a contractual relationship with you.

**Withdrawing consent using your information** – Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

Please contact us in any of the ways set out in the *Contact information and further advice* section if you wish to exercise any of these rights.

### **Changes to our privacy statement**

We keep this privacy statement under regular review and will place any updates on this website. Paper copies of the privacy statement may also be obtained any of our offices.

This privacy statement was last updated on 1 May 2018.

### **Contact information and further advice**

Further information can be obtained from any partner in Henderson Black & Co or from Robin Winter by email at [rwinter@hendersonblack.co.uk](mailto:rwinter@hendersonblack.co.uk)

### **Complaints**

We seek to resolve directly all complaints about how we handle personal information but you also have the right to lodge a complaint with the Information Commissioner's Office, whose contact details are as follows:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone - 0303 123 1113 (local rate) or 01625 545 745

Website - <https://ico.org.uk/concerns>