
Sayers Butterworth LLP

Chartered Accountants, Tax and Business Advisors

Privacy Policy

April/May 2018.1 revision

Your information will be held by Sayers Butterworth LLP Chartered Accountants, Tax and Business Advisors. We recognise that as a business we accumulate a large amount of very personal and private data and have always taken our responsibilities extremely seriously.

More information on the organisation can be found at www.sayersb.co.uk.

Processing your personal information

This privacy notice is to let you know how we promise to look after your personal data. This includes what you tell us about yourself, what we learn by having you as a client or business contact, and the choices you make about what marketing materials you want us to send you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

Our Privacy Promise

We promise:

- To keep your data safe and private.
- Never to sell your data.
- Never to pass your data to third parties without your prior approval unless specifically required under law.
- To give you ways to manage and review your marketing choices at any time.
- When we have your authority to share data (for example with HMRC) we will only share data which is relevant to the matter in question.

Data Protection law will change on 25 May 2018

This notice sets out your rights under the new laws. We may update it again periodically, both before and after 25 May 2018 when the new regulations come into effect.

About us

Sayers Butterworth LLP is a firm of chartered accountants, tax and business advisors with offices at 3rd Floor, 12 Gough Square, London EC4A 3DW.

You can find out more about us at www.sayersb.co.uk.

If you have any questions, or want more details about how we use your personal data, you can ask us by e-mailing our general address enquiries@sayersb.co.uk or by calling us on +44 (0)20 7936 1910.

Your protection under the law

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works.

Data Protection law says that we are allowed to use personal data only if we have a proper reason to do so. This includes sharing it outside of Sayers Butterworth LLP. The law says we must have one or more of these reasons:

- To fulfil a contract or agreement we have with you
- When it is our legal duty
- When it is in our legitimate interest
- When you consent to it

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we must tell you what that is.

This is a list of some of the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

What we use your personal data for	Our reasons	Our legitimate interests
<ul style="list-style-type: none">• To manage our relationship with you or your business.• To develop new ways to meet our clients' needs.• To provide advice or guidance in relation to your accounting and tax affairs.	<ul style="list-style-type: none">• Your consent.• Fulfilling letters of engagement or other agreements.• Our legitimate interests.• Our legal duty.	<ul style="list-style-type: none">• Keeping our records up to date, working out which of our clients may be affected by changes in legislation and telling them accordingly.• Creation of statutory financial records for submission to the relevant authorities.• Preparation of Tax Returns and other compliance tasks for individuals, companies, partnerships and trusts.• Seeking your consent when we need it to contact you.• Being efficient about how we fulfil our legal duties.
<ul style="list-style-type: none">• To manage how we work with other companies and suppliers that provide services to us and our clients.	<ul style="list-style-type: none">• Fulfilling letters of engagement or other agreements.• Our legitimate interests.• Our legal duty.	<ul style="list-style-type: none">• Maintenance of internal record-keeping.

<ul style="list-style-type: none"> • To deliver our professional services • To make and manage client payments. • To manage fees charged to our clients. • To collect and recover money that is owed to us. 	<ul style="list-style-type: none"> • Fulfilling letters of engagement or other agreements. • Our legitimate interests. • Our legal duty. 	<ul style="list-style-type: none"> • Being efficient about how we fulfil our legal and contractual duties. • Complying with regulations that apply to us.
<ul style="list-style-type: none"> • To detect, investigate, report and seek to prevent financial crime. • To mitigate risk for us and our clients. • To obey laws and regulations that apply to us. • To respond to complaints and seek to resolve them. 	<ul style="list-style-type: none"> • Fulfilling letters of engagement or other agreements. • Our legitimate interests. • Our legal duty. 	<ul style="list-style-type: none"> • Improving how we deal with financial crime. • Complying with regulations that apply to us. • Being efficient about how we fulfil our legal and contractual duties.
<ul style="list-style-type: none"> • To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance and audit. 	<ul style="list-style-type: none"> • Our legitimate interests. • Our legal duty 	<ul style="list-style-type: none"> • Complying with regulations that apply to us. • Being efficient about how we fulfil our legal and contractual duties.
<ul style="list-style-type: none"> • To exercise our rights as set out in engagement letters or other contracts and agreements. 	<ul style="list-style-type: none"> • Fulfilling contracts. 	<ul style="list-style-type: none"> • Being efficient about how we conduct business and fulfil agreements.

Types of Personal Information

We may use many different types of personal data when carrying out our work, including the following:

Type of data	Description
Personal	Your name, address and date of birth.
Financial	Your financial position, status and history.
Contact	Where you live and how to contact you.
Socio-Demographic	This includes details about your work or profession, nationality and residence status.
Transactional	Details about payments to and from your client account with us and any payments we make on your behalf to other parties.
Contractual	Details about the professional services we provide to you.

Communications	What we learn about you from letters, emails and conversations between us.
Social Relationships	Your family, business colleagues and other relationships.
Open Data and Public Records	Details about you that are in the public domain, such as those at Companies House or the Electoral Register, and information about you that is openly available on the internet.
Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, driving license or birth certificate.
Consents	Any permissions, consents or preferences that you give us. This includes things like how you want us to contact you.
National Identifier	A number or code given to you by a government to identify who you are, such as a National Insurance number.

Where we collect personal information from

We may collect personal information about you (or your business) from these sources:

Data you give to us:

- When you enquire about our professional services.
- When you talk to us on the phone or in an introductory meeting.
- When you use our website to request information from us.
- When you become a client of the firm.
- In supporting documents you send to us.
- Via third-parties with your consent.
- In email conversations.

Data we collect when you use our services:

- Payment and transaction data.
- Personal data and financial data insofar as they are required to enable us to carry out our duties to clients.

Data from other parties we work with:

- Companies that introduce you to us
- Financial advisers
- Trade suppliers
- Credit reference agencies

- Insurers
- Fraud prevention agencies
- Payroll service providers
- Public information sources such as Companies House
- Agents working on our behalf
- Government and law enforcement agencies

Who we share your personal information with

We will share your personal data with these organisations based on existing authorisations:

- HM Revenue & Customs, regulators and other government authorities.

We may share your personal data with these organisations if you expressly request it:

- HM Revenue & Customs, regulators and other authorities.
- Credit reference agencies
- Fraud prevention agencies
- Any party linked with you or your business product.
- Organisations that introduce you to us.
- Companies that we introduce you to.
- Independent Financial Advisors.
- Companies you ask us to share your data with.

We may also need to share your personal information with other organisations to provide you with the service you have requested from us:

- If you use direct debits, we will share your data with the Direct Debit scheme.
- If you apply for fee protection insurance through us, we may be required to pass your personal or business details to the insurer, and onto any reinsurers.
- If you make an insurance claim, information you give to us may be put on a register of claims.

Sending data outside of the EEA

We will only send your data outside of the European Economic Area (EEA) to:

- Follow your instructions.
- Comply with a legal duty
- Work with parties who help us provide professional services to you.

If we do transfer information outside of the EEA, we will make sure it is protected in the same way as if it was being used in the EEA. We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA.
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA.

- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between countries and it makes sure those standards are similar to what is used within the EEA.

How we protect your data

At Sayers Butterworth we take data security very seriously and have undertaken a thorough review of our internal procedures to ensure every care is taken to safeguard client data. We are a Cyber Essentials Plus Certified organisation.

With effect from 25 May 2018, documents containing personal data which we send to you (such as Tax Returns for approval or payslips where we undertake payroll duties for a client) will be sent via a Mimecast secure messaging facility which encrypts the e-mail traffic. Mimecast is an ISO/IEC 27001 registered supplier. You will be required to logon to a remote secure portal (using a password of your choice) in order to access these personal documents. If for any reason we are unable to transmit documents in this way they may be sent by normal e-mail methods, however any attachments will always be password protected.

Any personal data taken offsite, for example for the purposes of a client audit, will be stored on encrypted volumes and never on conventional hard disks.

If you choose not to give us personal information

We may need to collect personal data from you by law, or under the terms of an engagement we have with you.

If you choose not to give us this information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to fulfil the terms of our engagement with you.

Any data collection that is optional would be made clear at the point of collection.

Marketing and promotion

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

We will not generally send out any marketing material as such but on occasion we may offer you promotional or technical material such as our annual Budget Guide. We will seek your express permission before sending you such communications.

How long we keep your personal information

We will keep your personal data for as long as you are a client of Sayers Butterworth LLP. After you stop being a client, we may keep your data for up to 6 years for one of these reasons:

- To respond to any queries you may have.

- To supply information to new advisors.
- To maintain records according to rules that apply to us.

We may keep your data for longer than 6 years if we cannot delete it for legal, regulatory or technical reasons. If we do, we will make sure that your privacy is protected and only use it for these purposes. We will also consult with you at every stage so you are aware of what is happening to your data.

How to get a copy of your personal information

You can access the personal data we hold for you by filling in an official data subject access request form (available from us) or by writing to us at:

3rd Floor
12 Gough Square
London
EC4A 3DW

Letting us know if your personal information is incorrect

You have the right to question any information or data we have about you and that you think is wrong or incomplete. Please contact us if you want to do this.

If you do, we will take all reasonable steps to check its accuracy and correct it.

What if you want us to stop using your personal data?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure, or the 'right to be forgotten.'

There may be legal or other official reasons why we need to keep or use your data. Please tell us if you think that we should not be using it.

You can ask us to restrict the use of your personal information if:

- It is inaccurate.
- It has been unlawfully obtained but you don't want us to delete it.
- It is not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data or ask us to delete it or restrict how we use it, please contact us.

How to withdraw your consent

You can withdraw your consent at any time. Please contact us if you want to do so.

If you withdraw your consent, we may not be able to provide certain professional services to you. If this is the case we will tell you.

How to complain

Please let us know if you are unhappy with how we have used your personal information. You can contact us using the details here:

Sayers Butterworth LLP
3rd Floor
12 Gough Square
London
EC4A 3DW

Telephone: +44 (0)20 7936 1910
Email: gdpr@sayersb.co.uk

You also have the right to complain to the Government's Information Commissioner's Office.

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

Tel: 0303 123 1113
Web: <https://ico.org.uk>