RS Bookkeeping Solutions Ltd

Privacy Notice

Introduction

When we provide our services to you, we will collect personal information about you and we want to be open and transparent with you as to the types of information we collect about you, why we collect it, how we use it and who we may share it with.

The data controller and/or processor of your personal information is RS Bookkeeping Solutions Ltd, registered at 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ, company registration number 10738456. RS Bookkeeping Solutions Ltd is registered with the Information Commissioners Office (ICO) under reference ZA250866.

We are committed to the protection of your privacy and confidentiality. We recognise that you are entitled to know that your data will not be used for any unintended purpose and will not accidentally fall into the hands of a third party.

We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

We have in place procedures and training for data protection, confidentiality and information security. These are regularly reviewed to ensure that they remain effective.

Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org.

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our services and website.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Notice.

The data we collect about you

We provide a range of services to businesses and personal clients. We aim to process data, whether personal data or not, only to the extent necessary for us to provide our clients with our services and for other agreed purposes.

Personal clients

If you are a personal client, personal data that we may process may include contact information, information about your business activities, information about your family members, and financial information such as that relating to your income, expenses, taxation and investments.
In most cases, your personal data will have been provided to us by you. However, with your consent, or if it is necessary in order to provide you with our services, we may have obtained your personal data from a third-party source.

**Third parties connected to clients and suppliers**

We may process your personal data if you have a personal or business connection with any of our clients or suppliers. For example, you may be a family member, business partner, other adviser, supplier or transaction counterparty.

The data we process may include contact information, information about business activities, information about partners, directors, employees, information relating to employment remuneration and payroll, and financial information such as that relating to income, expenses, taxation and investments.

We may be given your personal data by our clients or suppliers, or by third parties acting on the instructions of a client or a supplier.

We ask our clients and suppliers to bring this privacy notice to your attention as soon as they become aware that we process your personal data.

**Suppliers**

If you supply our business with goods or services, including subcontracted services that we supply to our clients, then we may process your personal information. However, we do so only to the extent necessary to contract with you.

In most cases, your personal data will have been provided to us by you. However, sometimes we use third parties such as credit rating agencies to make decisions regarding our relationship.

**Other**

We may require documentary details from you such as a driving licence, passport or birth certificate, in order to comply with our obligations under identification, money laundering and anti-terrorism legislation.

Our collection methods are:

- via our website;
- through engagement (or potential engagement) of our services;
- by communications, including email, telephone, post or social media;
- networking;
- through engagement of service providers;
- via third parties and/or publicly available resources (for example from your employer or from Companies House).

**The bases on which we process personal information**

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.
If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

We do not sell or share any personal data with third parties unless we have explicit consent to do so from the data subject.

**Information we process because we have a contractual obligation**

We may process personal information when a contract has been formed with our business and processing is necessary to carry out our obligations under that contract, or when processing personal data is necessary in order to form a contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

**Information we process with your consent**

Only when you have given us explicit permission to do so, do we process your personal information under the basis of consent.

For example, you might have agreed that we may pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at Raminta@rsbookkeepingsolutions.com. However, if you do so, you may not be able to use our website or our services further.

**Information we process for the purposes of legitimate interests**

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

✓ whether the same objective could be achieved through other means;
✓ whether processing (or not processing) might cause you harm;
✓ whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so.

For example, we may process your data on this basis for the purposes of:

✓ record-keeping for the proper and necessary administration of our business;
✓ responding to communication from you to which we believe you would expect a response;
✓ protecting and asserting the legal rights of any party;
✓ insuring against or obtaining professional advice that is required to manage business risk;
✓ protecting your interests where we believe we have a duty to do so.
We will never sell your data to a third party for marketing purposes.

**Information we process because we have a legal obligation**

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal or tax authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

**How your data will be used**

We use information held about you to:

- ✓ provide services to you (or your employer or our client) under a contract, as set out in a Letter of Engagement between us;
- ✓ ensure that content from our website is presented in the most effective manner for you and for your devices;
- ✓ provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes or by Legitimate Interests;
- ✓ carry out necessary maintenance to our infrastructure;
- ✓ notify you about changes to our services;
- ✓ fulfil our legal obligations including money laundering and identification checks, complying with anti-terrorism financing and Criminal Finances Act legislation;
- ✓ use in the investigation and/or defence of potential complaints, disciplinary proceedings and legal proceedings; and
- ✓ enable us to invoice you for our services and investigate/address any attendant fee disputes that may have arisen.

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

We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

We also embrace the use of social media and may wish to process any comments made public by you.

**How we will share your data**

Your information will be retained within the company except where disclosure is required or permitted by law or when we use third party service providers (data processors) to supply and support our services to you.

We may also pass your data to third party external organisations where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.
We may use third party service providers such as agents, subcontractors and other organisations to help us provide services to you. These would include:

✓ cloud accounting and payroll providers including Xero, Quickbooks, Sage, Free Agent, Fathom, Receipt Bank, AutoEntry, and associated payroll processing services;
✓ email and secure Document exchange systems including Mimecast, Virtual Cabinet, Microsoft and Sharefile;
✓ Squarespace, Mailchimp, marketing agencies, research agencies and mailing houses;
✓ off-site storage.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

Data may be processed outside the European Union

Our website is hosted in the EU.

As part of the services offered to you, we may send your data outside of the European Economic Area (EEA). Where this is the case, we will take reasonable steps to ensure that your data is protected in the same way as if it was being used in the EEA.

Communicating with you

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high-quality service.

Dealing with complaints

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

If the complaint relates to information on our website and we feel it is justified or if we believe the law requires us to do so, we shall remove the information while we investigate.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.
We may compile statistics from information relating to complaints to assess the level of service we provide, but not in a way that could identify you or any other person.

**Job applications and employment**

If you send us information in connection with a job application, we may keep it for up to six months in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

**Cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

We provide more information about the cookies we use in our cookie policy.

**Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded. We gather data from you using cookies and other internet tracking software, such as Google Analytics.

We record information that could identify your location, such as your IP address. We also record information reported by the software you are using to browse our website, such as the type of computer or device and the screen resolution.

The purpose of this is to understand your requirements of our services, and to provide you with better and enhanced information.

**Information we obtain from third parties**

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

No such information is personally identifiable to you.

**Access to your personal information**

We endeavour to be as open as we can be in terms of giving people access to their personal data. A Subject Access Request under the GDPR is your right to request a copy of the information that we hold about you. Such requests must be in writing to the contact details provided in this policy. If we
do hold your personal data we will respond in writing within one calendar month of your request (where that request was submitted in accordance with this policy).

The information we supply will:

✓ confirm that your data is being processed;
✓ verify the lawfulness and the purpose of the processing;
✓ confirm the categories of personal data being processed;
✓ confirm the type of recipient to whom the personal data have been or will be disclosed, and
✓ let you have a copy of the data in an intelligible form.

Please note that you may need to provide identification in order to prove who you are to access your data.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone or email.

In the instance that we do not hold information about you we will also confirm this in writing at the earliest opportunity.

**Verification of your information**

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

**Removal of your information**

Under GDPR you have the right to erasure under specific circumstances. A request for your personal data to be deleted will be decided on a case by case basis and must be submitted in writing to raminta@rsbookkeepingsolutions.com.

**Correction of your information**

We will correct or update your data at the earliest opportunity provided you make the request in writing to raminta@rsbookkeepingsolutions.com, clearly specifying which data is incorrect or out of date.

**Retention period for personal data**

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

✓ to provide you with the services you have requested;
✓ to comply with other law, including for the period demanded by our tax authorities;
✓ to support a claim or defence in court.

**Security of your data**

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or
disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

**Withdrawal of your consent**

Where you have consented to our processing of your personal data, you have the right to withdraw that consent at any time. Please inform us immediately if you wish to withdraw your consent.

Please note:

✓ the withdrawal of consent does not affect the lawfulness of earlier processing;
✓ if you withdraw your consent, we may not be able to continue to provide services to you;
✓ even if you withdraw your consent, it may remain lawful for us to process your data on another legal basis (e.g. because we have a legal obligation to continue to process your data).

**If you are not happy with our privacy policy**

If you are not happy with our privacy policy or if have any complaint then you should contact us.

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner’s Office. This can be done at [https://ico.org.uk/concerns/](https://ico.org.uk/concerns/).

**Compliance with the law**

Our privacy policy has been compiled so as to comply with the law of the UK.

**Review of this privacy policy**

We keep our privacy notice under regular review and you should check back regularly to ensure you are aware of changes to it.

**How to contact us**

If you would like to contact us in relation to this Notice or if you have any other questions in respect of our processing of your personal information, please contact us on raminta@rsbookkeepingsolutions.com.