



PRIVACY NOTICE

Clamarpen Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

This notice describes how we collect and use personal data about you, in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act 2018 and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK ('Data Protection Legislation').

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

1. INFORMATION ABOUT US

Clamarpen Limited (trading as Chris Edwards Chartered Accountants) is a chartered accountancy firm. We are registered in England and Wales as a limited company under number 07606415 and our registered office is at 17 Napier Court, Gander Lane, Barlborough, Chesterfield, Derbyshire, S43 4PZ.

For the purpose of the Data Protection Legislation and this notice, we are the 'data controller'. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

We have appointed a data protection manager. Our data protection manager is our Data Protection Point of Contact and is responsible for assisting with enquiries in relation to this privacy notice or our treatment of your personal data. Should you wish to contact our Data Protection Point of Contact you can do so using the contact details noted at Part 12 (Contact Us), below.

2. WHAT IS PERSONAL DATA?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

3. WHAT ARE YOUR RIGHTS?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) **The right to be informed** about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- b) **The right to access** the personal data we hold about you.
- c) **The right to have your personal data rectified** if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) **The right to be forgotten**, i.e. the right to ask us to delete or otherwise dispose of any of your personal

data that we have. Please contact us using the details in Part 12 to find out more.

- e) **The right to restrict** (i.e. prevent) the processing of your personal data.
- f) **The right to object** to us using your personal data for a particular purpose or purposes.
- g) **The right to data portability.** This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the **right to withdraw** your consent for that specific processing at any time. To withdraw your consent, please email our data protection point of contact.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

4. **HOW DO WE COLLECT PERSONAL DATA?**

We obtain personal data about you, for example, when:

- you request a proposal from us in respect of the services we provide;
- you or your employer or our clients engages us to provide our services and also during the provision of those services;
- you contact us by email, telephone, post or social media (for example when you have a query about our services); or
- from third parties and/or publicly available resources (for example, from your employer or from Companies House).

5. **WHAT PERSONAL DATA DO WE COLLECT?**

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Personal details (such as name, date of birth, gender, address, email address, telephone number, business name, job title, profession, marital status, town of birth, mother's maiden name, father's first name, eye colour, passport number, national insurance number, unique tax reference, bank account details)
- details of contact we have had with you in relation to the provision, or the proposed provision, of our services;
- details of any services you have received from us;
- our correspondence and communications with you;
- information about any complaints and enquiries you make to us;
- information from research, surveys, and marketing activities;

Your personal data may be obtained from the following third parties:

- publicly available resources such as Companies House;
- your employer or our clients; or
- other professional contacts.

6. HOW DO WE USE YOUR PERSONAL DATA?

We may process your personal data for purposes necessary for the performance of our contract with you or your employer or our clients and to comply with our legal obligations.

We may process your personal data for the purposes necessary for the performance of our contract with our clients. This may include processing your personal data where you are an employee, subcontractor, supplier or customer of our client.

We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for statistical and management purposes.

We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

Situations in which we will use your personal data

We may use your personal data in order to:

- carry out our obligations arising from any agreements entered into between you or your employer or our clients and us (which will most usually be for the provision of our services);
- carry out our obligations arising from any agreements entered into between our clients and us (which will most usually be for the provision of our services) where you may be a subcontractor, supplier or customer of our client;
- provide you with information related to our services and our events and activities that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes;
- seek your thoughts and opinions on the services we provide; and
- notify you about any changes to our services.

In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

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.

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.

7. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

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; and
- whether the purpose of the processing could reasonably be fulfilled by other means.

8. HOW AND WHERE DO WE STORE OR TRANSFER YOUR PERSONAL DATA?

We will only store or transfer your personal data in the EEA. This means that it will be fully protected under the GDPR.

If, in an exceptional instance, we need to transfer any of your personal data outside of the EEA we will notify you of this fact and obtain formal consent from you before it is transferred.

9. DO WE SHARE YOUR PERSONAL DATA?

All of our staff have a duty of confidentiality and have received appropriate training to ensure they understand and adhere to their duty of confidentiality.

Which third-party service providers process my personal data?

“Third parties” includes third-party service providers. The following activities are carried out by third-party service providers: document portal, professional advisory services, pension administration services and banking services.

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.

What about other third parties?

We may pass your data to third parties where we are required to do so by law, for example, by a court order or for the purposes of prevention and detection of crime, fraud, money laundering or corruption.

We will not release your information to third parties other than third party service providers or where required by law unless you have requested that we do so.

10. DATA SECURITY

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.

11. CHANGES TO THIS PRIVACY NOTICE

We may change this privacy notice from time to time. This may be necessary, for example, if the law changes.

Any changes will be made available on our website at www.chris-edwards.co.uk.

This privacy notice is effective from 25 May 2018.

12. HOW DO YOU CONTACT US?

To contact us about anything to do with your personal data and data protection, including to make an access request, please use the following details (for the attention of Chris Edwards):

Email address info@chris-edwards.co.uk.

Telephone number 01246 570 581.

Postal Address 17 Napier Court, Gander Lane, Barlborough, Chesterfield, Derbyshire, S43 4PZ.

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

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

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

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