

# Naylor Wintersgill Privacy Policy



Naylor  
Wintersgill™  
Chartered Accountants



Naylor Wintersgill is committed to ensuring the privacy of its clients and takes appropriate security measures to safeguard the transfer and storage of personal data.

During the course of our activities we, Naylor Wintersgill Limited, will process personal data (which may be held on paper, electronically, or otherwise) about our clients. We recognise the need to treat this information in an appropriate and lawful manner, in accordance with the General Data Protection Regulations (GDPR).

The purpose of this policy is to make you aware of how we will handle your personal data.

## What is personal data and what is the processing of personal data?

Personal data refers to any recorded information we hold about you, clients and contacts from which the relevant person can be identified. It may include contact details, other personal information, photographs, and expressions of opinion about you or indications as to our intentions about you. "Processing" means doing anything with the data, such as accessing, disclosing, destroying or using the data in any way.

## What regulations cover the processing of your personal data?

We are obliged to comply with the General Data Protection Regulations when processing any personal data. When using IT applications, personal data may be stored outside of the UK. Further information on this can be found in our Standard Terms of Business.

### Who is our Data Protection Officer (DPO)?

Our DPO is Alison Whalley. Alison can be contacted via email at: [alisonw@naylorwintersgill.co.uk](mailto:alisonw@naylorwintersgill.co.uk) or via telephone on 01274 733 184.

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You may also write to her at Carlton House, Grammar School Street, Bradford, BD1 4NS.



## How do we obtain personal data?

In many situations, you will provide us with your personal data when you first engage Naylor Wintersgill as your service provider for Accounting, Tax, Payroll or HR services. The information given will include your name, address and contact details, date of birth and National Insurance number. You will be required to provide a copy of your passport and may also confirm your bank account details. Where we process your payroll we will also obtain the personal data of your employees.

## Information we get from other sources:

Naylor Wintersgill's premises are covered by CCTV. Upon entering the car park and Reception area of our offices, your images will be recorded. These images are kept for no longer than seven days.

If you apply for a position with us (either by email or through the post) we will only use the information you provide during the recruitment process to progress your application with a view to offering you an employment contract with us, or to fulfil legal or regulatory requirements if necessary. We will not keep any information provided longer than necessary and an unsuccessful candidate's details will be deleted within three months of the last communication between us.

We only obtain information from third parties if this is permitted by law or from legal public sources of information. For example, Companies House.

## How will we use your personal data?

We use your personal data to provide, manage and fulfil those services that we have been engaged, or may be engaged to provide to you.

We take all reasonable security measures in order to protect your personal data, complying with the requirements of GDPR and the ICAEW (our governing body). As applicable, the information you provide may be used for the following reasons (this list is not exhaustive):

- Provide professional services – We provide a diverse range of professional services and financial advice. Some of our services require us to process personal data in order to provide advice and deliver our contract. For example, we will review payroll data as part of an audit.
- Administer, manage and develop our businesses and services – We process personal data in order to run our business, including:
  - Managing our relationship with clients;
  - Developing our businesses and services (such as identifying client needs and improvements in service delivery);
  - Maintaining and using IT systems;
  - Hosting or facilitating the hosting of events; and administering and managing our website and systems and applications.
- Security, quality and risk management activities – We have security policies and procedures in place to protect both our own and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails.
- We monitor the services provided to clients for quality purposes, which may involve processing personal data stored on the relevant client file. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to client engagements.



## How will we use your personal data continued...

- We collect and hold personal data as part of our client engagement and acceptance procedures. As part of those procedures we carry out searches using publicly available sources such as internet searches and sanctions lists. These searches are to check that there are no issues that would prevent us from working with a particular client, such as sanctions, criminal convictions (including in respect of company directors), conduct or other reputation issues.
- Providing our clients and potential clients with information about us and our range of services – We use contact details (such as your email address, phone number or address) to provide information that we think will be of interest about us and our services. For example, other services that may be relevant, industry news updates and invites to events.
- You always have the right to 'opt out' of receiving our marketing at any time by contacting [events@naylorwintersgill.co.uk](mailto:events@naylorwintersgill.co.uk) or clicking on the 'unsubscribe' link in any emails we send you. If you 'opt-out' of our marketing materials you will be added to our suppression list to ensure we do not accidentally send you further marketing and keep that suppression list indefinitely to comply with our legal obligations.
- We will not pass your data to any third party marketing companies. We do use third party service providers to send out our marketing, but we only allow them to use that information on our instructions and where they have agreed to treat the information confidentially and keep it secure.
- Complying with any requirement of law, regulation or a professional body of which we are a member – As with any provider of professional services, 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.

## Sharing information:

We will keep information about you confidential however there may be times when we are required to share your data with third parties. Your information will be disclosed to some, if not all, of the following third parties as part of our requirements to meet statutory regulations:

- HMRC
- Pension providers
- The Pension Regulator
- Anyone to whom we may transfer our right and duties under any agreement we have with you
- Legal or crime prevention agencies as required by law



## Your rights:

GDPR allows the data subject (the person to whom the data refers) certain rights in order to ensure that the data held on you is accurate and being processed in accordance with legislation. In some instances it allows for you to request the deletion of such data from our systems.

You have the right to:

- (a) Request access to any personal data we hold about you by making a Subject Access Request (SAR) to the Data Protection Officer.
- (b) Restrict the processing of your data where you contest the accuracy of the data, believe the processing of data is unlawful or object to the process of the data until you are satisfied with the legitimate grounds for us doing so.
- (c) Ask to have inaccurate data held about you amended without undue delay.
- (d) Object to processing that is likely to cause unwarranted substantial damage or distress to you or anyone else.
- (e) Object to any decision that significantly affects you being taken solely by a computer or other automated process.
- (f) Request for data held about you to be forgotten (deleted) where it is not required to be held for legal or regulatory purposes. Please refer to our terms of business for specific time retention periods.
- (g) Move, copy or transfer your personal data easily from one IT environment to another under the right to data portability.

If you would like to instigate any of your rights, you should contact our Data Protection Officer.

## How long do we keep this information about you?

We will not keep your personal data for longer than is necessary. This means that data will be destroyed or erased from our systems when it is no longer required.

For more information on specific retention periods, please refer to our standard terms of business.

## Breaches of this policy:

If you consider that there has been a breach of your rights or of the rights of any client/contact under GDPR you should raise the matter with our Data Protection Officer.

Any breach of the GDPR which is likely to result in a high risk to the rights and freedoms of you as an individual or any of our clients/contacts will be reported to the Information Commissioners Office (ICO) without undue delay and where feasible within 72 hours of us becoming aware of the suspected breach. For example, if a breach may result in discrimination against an individual or a loss of confidentiality this should be reported to the Data Protection Officer who will then notify the ICO as appropriate. You should report any suspected breach in line with our How to report a Data Breach Policy.

## Policy changes:

This policy is subject to ongoing review in order to ensure we remain compliant with GDPR and maintain the security of your personal data. We reserve the right to update or amend this policy. We refer you to our website for the latest version of this policy, [www.naylorwintersgill.com](http://www.naylorwintersgill.com).



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