

INTRODUCTION

Spencer Accounting Services Limited is committed to protecting and respecting your privacy.

Everyone has rights with regard to the way in which their personal information is handled. During the course of our activities we will collect, store and process personal information about our customers, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

This policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

For the purpose of UK data protection laws, the data controller is Colin Spencer of 27 Little Normans, Longlevens, Gloucester GL2 0EH , registered with the Information Commissioner's Office reference: Z1725871.

DATA PROTECTION PRINCIPLES

When processing your information, we must comply with the six enforceable principles of good practice. These provide that your personal information must be:

- processed lawfully, fairly and in a transparent manner,
- processed for specified, explicit and legitimate purposes,
- adequate, relevant and limited to what is necessary,
- accurate and kept up-to-date,
- kept for no longer than is necessary, and
- processed in a manner than ensures appropriate security.

INFORMATION YOU GIVE TO US

We may collect, use, store and transfer different kinds of personal information about you, including:

- **Identity Data**, such as your name, title, date of birth, gender, job role, national insurance number, Tax UTR.
- **Contact Data**, such as your address, email address and telephone numbers,
- **Financial Data**, such as bank account and payment details where applicable for clients and suppliers,

- **Transaction Data**, including details about payments to and from you, and other details of products and services you purchase from us,
- **Technical Data**, including IP addresses, browser type and version, time-zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website,
- **Usage Data**, including information about how you use our website, products and services, and
- **Marketing Data**, such as your preferences in receiving marketing from us and our third parties, and your communication preferences.

‘SPECIAL CATEGORY’ DATA

Information relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, criminal convictions, sex life or sexual orientation, or certain types of genetic or biometric data is known as ‘special category’ data.

During the course of dealing with you, we do not expect to collect any ‘special category’ data about you.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We may obtain personal information by directly interacting with you, such as:

- Entering into a contract for services,
- subscribing to our newsletter mailing list,
- participating in discussion boards or other social media functions linked to our website,
- entering a competition, promotion or survey organised by us, or otherwise providing us with feedback,
- subscribing to our services or publications, or otherwise requesting marketing material to be sent to you,
- meeting with you,
- corresponding with us by phone, email, letters or otherwise.

We may obtain personal information via automated technology when you interact with our website by using cookies, server logs and other similar technologies.

We may also collect personal information about you from third parties or publicly-available sources, such as:

- analytics providers (such as Google),
- search information providers,
- Companies House, LinkedIn and other social media platforms and the electoral register.

HOW WE USE YOUR PERSONAL INFORMATION

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- you have given us consent,
- we need to perform a contract we are about to enter into, or have entered into, with you,
- where it is necessary for our or a third party's legitimate interests, and your interests and rights do not override those interests, or
- where we need to comply with a legal or regulatory obligation.

We will only use 'special category' information where we are allowed to do so under the law. Most commonly, that will occur when:

- we have your explicit consent to use it,
- we believe that we need to use that data to protect your vital interests where you are not able to provide us with your explicit consent,
- it is necessary for reasons of substantial public interest,
- you have previously made that data public knowledge, or
- if we need to use that data to establish, exercise or defence legal claims.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL INFORMATION

We may use your personal information for a number of different purposes. For each purpose, we are required to confirm the 'legal basis' that allows us to use your information, as follows:

Purposes for which we will use the information you give to us	Legal basis
To register you as a new customer	It will be necessary for the performance of the contract between you and us
To process your order and to provide the products and services to you (including managing payments, fees and charges)	It will be necessary for the performance of the contract between you and us
To process and file statutory accounts, income tax, corporation tax returns	It will be necessary for the performance of the contract between you and us
To collect and recover money owed to us	It will be necessary for our legitimate business interests, namely to ensure we receive payment for services that we have supplied to you

To notify you about changes to our terms and conditions, or to this privacy policy	It will be necessary for our legitimate business interests, namely to ensure you are aware of our current terms and conditions
To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, to allow you to participate in interactive features of our service, when you choose to do so, to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you and to make suggestions and recommendations to you and other users of our website about products or services that may interest you or them	It will be necessary for our legitimate business interests to ensure you receive the best experience possible when accessing and using our website. We will comply with our cookie policy when processing this information
To enable you to participate in a prize draw, raffle, competition or complete a survey	It will be necessary for our legitimate business interests, namely to study how clients use our services, to develop them and help grow our business
To provide you with information about special offers and other products and services we provide that are similar to those that you have already received from us	Where you have previously received marketing communications from us, then it will be necessary for our legitimate business interests, namely to ensure you continue to receive communications that you have previously agreed to receive In all other cases, we will only do this if you give us your consent
To market our services to other companies through the use of case studies and / or social media activities detailing the work we have undertaken for you	We will only do this if you give us your consent and subject to your approval of the material we propose to share

We will only use your personal information for the purpose(s) for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

[WHAT IF YOU CANNOT OR WILL NOT PROVIDE US WITH YOUR PERSONAL INFORMATION](#)

It is a contractual requirement for you to provide us with certain information, namely your name, address, email address and invoicing address. If you do not provide us with that information, we will be unable to provide or supply the products and services you have requested. You may also be liable to pay additional costs.

COOKIE POLICY

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Purpose	Expires
wordpress_logged_in_ wordpress_sec_	Wordpress uses these cookies when you are logged in to determine that you are successfully logged in.	When browser closes
wordpress_test_cookie	Wordpress sets this cookie when you navigate to the login page. This checks if your browser is set to allow cookies.	When browser closes
wp-settings-	Used to customise your view of our site when logged in	1 year
wp-settings-time-	Used to customise your view of our site when logged in	1 year

wfwaf-authcookie-	This cookie is set by the Wordpress security plugin 'Wordfence'. It is used to authenticate you at login.	1 day
comment_author comment_author_email comment_author_url	If you leave a comment on our site, WordPress will set these cookies to aid you in leaving future comments	1 year

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

DISCLOSURE OF YOUR INFORMATION

We may share your personal information with the parties set out below:

- providers of IT and system administration services to our business, including GrafX, Stu-Art Creative Limited, Dropbox, One Drive, Xero, Wordpress, and other online cloud providers
- our professional advisers (including solicitors, bankers, auditors and insurers)
- HM Revenue & Customs, the Information Commissioner's Office, regulators and other authorities who require reporting of processing activities in certain circumstances,
- analytics and search engine providers that assist us in the improvement and optimisation of our website, and
- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this policy.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

WHERE WE STORE YOUR PERSONAL INFORMATION

All information you provide to us is stored on Dropbox secure servers. All files stored online by Dropbox are encrypted and kept in secure storage servers. Storage servers are located in data centers across Germany.

We will take all steps reasonably necessary to ensure that your data is treated securely, including taking the following safeguards:

- **Building entry controls.** The whole of 105-107 Bath Road is accessed with an electronic secure door code entry system.
- **Computer security.** Access to all computers and laptops / tablets is limited to password controlled users. Passwords are stored securely in an online 'vault' supplied by our IT suppliers.
- **Server security.** All data is stored on secure Dropbox servers located in the Germany.
- **Secure lockable desks and cupboards.** Desks and cupboards are kept locked when not in use if they hold confidential information of any kind.
- **Methods of disposal.** Paper documents are disposed of by shredding in a manner that ensures confidentiality.
- **Firewalls.** IT systems are protected by a Cisco Meraki MX60 security appliance.
- **Encryption.** All connections within Microsoft Outlook (email package) are secured by TSL and SSL encryption protocols that secure emails in transit.
- **Transfers Outside European Union.** We do not transfer your personal information outside the European Union.

If you are concerned about the levels of data security in any of those countries, please let us know and we will endeavour to advise what steps will be taken to protect your data when stored overseas.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

HOW LONG WE WILL STORE YOUR PERSONAL INFORMATION

The length of time that we will store your data will depend on the 'legal basis' for why we are using that data, as follows:

Legal basis	Length of time
Where we use/store your data because it is necessary for the performance of the contract between you and us	We will use/store your data for as long as it is necessary for the performance of the contract between you and us
Where we use/store your data because it is necessary for us to comply with a legal obligation to which we are subject	We will use/store your data for as long as it is necessary for us to comply with our legal obligations
Where we use/store your data because it is necessary for our legitimate business interests	We will use/store your data until you ask us to stop. However, if we can demonstrate the reason why we are using/storing your data overrides your interests, rights and freedoms, then we will continue to use and store your data for as long as it is necessary for the

	performance of the contract between you and us (or, if earlier, we no longer have a legitimate interest in using/storing your data)
Where we use/store your data because you have given us your specific, informed and unambiguous consent	We will use/store your data until you ask us to stop

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitive of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

YOUR RIGHTS

You have various legal rights in relation to the information you give us, or which we collect about you, as follows:

- You have a **right to access the information** we hold about you free-of-charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained the information and for how long we will use your information.
- You have the **right to ask us to rectify any information** we hold about you that is inaccurate or incomplete.
- You have the **right to ask us to erase the information** we hold about you (the 'right to be forgotten'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.
- You have the **right to ask us to stop using your information** where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a legitimate reason to use the information. Please note that we may continue to store your information, or use your information for the purpose of legal proceedings or for protecting the rights of any other person.
- You have the **right to ask us to transmit the information** we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- Where we use/store your information because it is necessary for our legitimate business interests, you have the **right to object to us using/storing your information**. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which overrides your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the **right to withdraw your consent** at any time.

- You have the **right to object to us using/storing your information for direct marketing purposes.**

If you wish to exercise any of your legal rights, please contact our data security team by writing to the address at the top of this policy, or by emailing us at info@spenceraccounting.co.uk

You also have the right, at any time, to lodge a complaint with the Information Commissioner's Office if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.

OPTING OUT OF RECEIVING MARKETING COMMUNICATIONS

You can ask us to stop sending you marketing communications at any time by contacting our data security team by writing to the address at the top of this policy, or by emailing us at info@spenceraccounting.co.uk

AUTOMATED DECISION-MAKING

We do not use automated decision-making processes.

THIRD PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

CHANGES TO OUR POLICY

Any changes we make to our policy in the future will be posted on our website and, where appropriate, notified to you by email or via social media. Please check our website frequently to see any updates or changes to our policy.

CONTACT

Questions, comments and requests regarding this policy are welcomed and should be addressed to our data security team by writing to the address at the top of this policy, or by emailing us at info@spenceraccounting.co.uk