

Privacy Policy & GDPR

Version 1.1 | Dated: 19th Nov 2018

Scope

This policy applies to Traynor Accounting Ltd and explains how we use any personal information we collect about you when you use our website or contact us by other methods, including email, post and telephone.

What is personal data?

Personal data relates to any information about a natural person that makes you identifiable which may include (but is not limited to):

- Names and contact information e.g. emails and telephone numbers
- National Insurance Numbers
- Employment history
- Employee numbers
- Credit History
- Personal tax
- Payroll and accounting data

Sensitive personal data refers to the above but includes genetic data and biometric data. For example:

- Medical conditions
- Religious or philosophical beliefs and political opinions
- Racial or ethnic origin
- Convictions
- Biometric data (e.g. photo in an electronic passport)

For general data protection regulation purposes, the term “data controller” means the person or organisation who decides the purposes for which and the way in which any personal data is processed. The data controller is Traynor Accounting Ltd, 9 Dunnswood House, Dunnswood Road, Wardpark, Cumbernauld, Glasgow G67 3EN. The data protection officer is Brian Traynor, Director, who can be contacted at the above address or via email or by calling 01236 222668.

A “data processor” is a person or organisation which processes personal data for the controller. Data processing is any operation or set of operations performed upon personal data, or sets of it, be it by automated systems or not. Examples of data processing explicitly listed in the text of the GDPR are: collection, recording, organising, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing by transmission, disseminating or making available, aligning or combining, restricting, erasure or destruction.

What information do we collect about you and how?

Traynor Accounting Ltd, as a Data Controller, is bound by the requirements of the General Data Protection Regulations (GDPR). You agree that we are entitled to obtain, use and process the information you provide to us to enable us to discharge the Services (as defined in our Letter of Engagement and supporting Schedules) and for other related purposes including;

- Updating and enhancing client records
- Analysis for management purposes
- Carrying out credit checks in relation to you
- Statutory returns
- Legal and regulatory compliance
- Crime prevention.

We collect information about you when you fill in any of the forms on our website. Website usage information is collected using cookies.

When submitting forms on our website we use a third-party software provider for automated data collection and processing purposes, they will not use your data for any purposes and will only hold the data in line with our policy on data retention.

Cookies are text files put on your computer to collect standard internet log information and visitor behaviour information. This information is then used to track visitor use of the website and to create statistical reports on website activity. For more information visit www.aboutcookies.org or www.allaboutcookies.org.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. Please note in a few cases some of our website features may not function because of this.

Analytics – e.g. how visitors use our website

We use Google Analytics to store information about how visitors use our website so that we may make improvements and give visitors a better user experience.

Google Analytics is a third-party information storage system that records information about the pages you visit, the length of time you were on specific pages and the website in general, how you arrived at the site and what you clicked on when you were there. These cookies do not store any personal information about you e.g. name, address etc and we do not share the data. You can view their privacy policy below:

Google – <http://www.google.com/intl/en/policies/privacy/>

IP addresses

An IP or Internet Protocol Address is a unique numerical address assigned to a computer as it logs on to the internet. We do not have access to any personal identifiable information and we would never seek this information. Your IP address is logged when visiting our site, but our analytic software only uses this information to track how many visitors we have from particular regions.

Internet Based Advertising

We use Google, Bing, LinkedIn and Facebook to advertise our services. We do not store any personal data within this type of tracking.

How will we use the information about you and why?

We take your privacy seriously and will only use your personal information to provide the Services you have requested from us, detailed in your Letter of Engagement and supporting Schedules and as we have identified above. We will only use this information subject to your instructions, data protection law and our duty of confidentiality.

For all clients our lawful reason for processing your personal information will be to supply the services you have requested. We will only process your information if we have a genuine and legitimate reason and we are not harming any of your rights and interests. We will also use the information to keep our records up to date and provide ongoing support.

We may receive personal data from you for the purposes of our money laundering checks, such as a copy of your passport. This data will only be processed for the purposes of preventing money laundering and terrorist financing, or as otherwise permitted by law or with your express consent.

Our work for you may require us to pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing the Services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the Services and we have contracts in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. We will ensure that they have adequate security measures in place and that they comply with this privacy policy.

We collect information on our website to process your enquiry. If you agree, we will also use this information to share updates with you about our services which we believe may be of interest to you.

We will not share your information for marketing purposes with companies so that they may offer you their products and services.

We reserve the right to disclose any of the information you provide to us where required to do so by law, or to comply with a regulatory obligation, or to assist in any investigation into alleged illegal or criminal conduct.

Security precautions in place about data collected

When you give us personal information, we take steps to make sure that it's treated securely. We aim to maintain all personal records accurately and securely to a reasonable standard. Non-sensitive details (your email address etc.) are sent normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

Profiling

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of extra information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and cut fraud and credit risk.

Marketing

Traynor Accounting Ltd will not contact you for marketing purposes unless you agree to this when you supply us with your information. You have the right to stop us using information about you for marketing purposes. If we want to use information about you for marketing, we will ask for your consent before we collect it.

If you agree to let us use information about you for marketing, you can change your mind at any time. There will be instructions if you no longer wish to be contacted for marketing purposes on how to opt out of marketing on our marketing correspondence or you can contact us via email, telephone or in writing at any time.

How long will we hold your data for?

- Marketing: We will hold your data for a period of 6 years with a review every 3 years. You will have the opportunity to opt out or update or delete data at any point should you need to do so and details are set out in this policy as to how to do that.
- Contracted Services: We will hold your data for 7 years in line with our regulatory requirements.

Access to your information, correction, portability and deletion

What is a Subject Access Request?

This is your right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal information, please email or write to us at the following address: Traynor Accounting Ltd, 9 Dunnswood House, Dunnswood Road, Wardpark, Cumbernauld, Glasgow G67 3EN. We will respond to your request within one month of receipt of the request. We may make a small charge for this service.

We want to make sure your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate by emailing us or writing to the above address.

Objections to processing of personal data

It is your right to lodge an objection to the processing of your personal data if you feel the "ground relating to your particular situation" apply. The only reasons we will be able to deny your request is if we can show compelling legitimate grounds for the processing, which override your interest, rights and freedoms, or the processing is for the establishment, exercise or defence of a legal claims.

Data Portability

It is also your right to receive the personal data which you have given to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without delay from the current controller if:

- (a) The processing is based on consent or on a contract, and
- (b) The processing is carried out by automated means.

Your Right to be Forgotten

Should you wish for us to completely delete all information that we hold about you then please email or write to us.

Other websites

Our website may at times contain links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

Complaints

If you feel that your personal data has been processed in a way that does not meet the GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will then tell you of the progress and outcome of your complaint. The supervisory authority in the UK is the [Information Commissioner's Office](#).

Changes to our Privacy Policy

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 24th May 2018 and the Version number is 1.0 in line with the new GDPR guidelines.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you either via email or in writing.