

## **Privacy Notice Introduction**

Webb & Co Ltd is committed to protecting information which identifies and relates to you or other individuals (personal information) and complying with data protection laws.

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU.

This privacy notice sets out Webb & Co Ltd.'s personal information collection and sharing practices in relation to the personal information that we collect and use for the administration of the accountancy and business advisory services.

#### **Personal Data**

Webb & Co Ltd uses the information collected from you to deliver the accountancy and business advisory services you have requested from us and provide quotations, make telephone contact and to email you marketing information which Webb & Co Ltd believes may be of interest to you and your business. In you making initial contact you consent to Webb & Co Ltd maintaining a marketing dialogue with you until you either opt out (which you can do at any stage) or we decide to cease in promoting our accountancy and business advisory services. Webb & Co Ltd also acts on behalf of its clients in the capacity of data processor. When working exclusively as a data processor, Webb & Co Ltd will be acting on the instruction of its client, and will work hard to ensure that the client is fully GDPR compliant.

We obtain information from you when you engage us to deliver our accountancy and business advisory services, book to attend an event or submit a request to receive a newsletter or marketing information, for example when you contact us about our accountancy and business advisory services. Some personal data may be collected about you from the forms and surveys you complete, from records of our correspondence, phone calls, or details you provide us, including but not limited to, personally identifying information like your name, address, dates of birth, telephone number, email address, your unique Tax reference (UTR), National Insurance Number, bank account details and other tax information.

Any information Webb & Co Ltd holds about you and your business encompasses all the details we hold about you and any sales transactions including any third-party information we have obtained about you from public sources and our own suppliers such as credit referencing agencies.

Registered to carry on audit work in the UK and Ireland and regulated for a range of investment business activities by the Institute of Chartered Accountants in England and Wales.



Webb & Co Ltd will only collect the information needed so that it can deal with your enquiry and provide the accountancy and business advisory services requested and provide the most appropriate response. We do not sell or broker your data, although coincidentally there may be times when your information could be contained in data that Webb & Co Ltd has purchased from a third-party list broker, on behalf of a client.

## Legal basis for processing any personal data

To meet Webb & Co Ltd's contractual obligations to clients and to also respond to marketing enquiries.

# Legitimate interests pursued by Webb & Co Ltd and/or its clients

To deliver the accountancy and business advisory services you have requested from us and promote the marketing and consulting services offered by Webb & Co Ltd to our existing clients.

## How is your information used?

Information is used only for the specific purpose for which it was provided. To provide the agreed accountancy and business advisory services we may use your information to:

- Contact you by post, email or telephone
- Verify your identity
- Understand your needs and how they may be met
- Maintain our records in accordance with legal and regulatory obligations
- Process financial transactions

#### Consent

Through accepting this privacy notice you are consenting to Webb & Co Ltd processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing <a href="mailto:office@webbco.co.uk">office@webbco.co.uk</a> or writing to us, see last section for full contact details.

#### **Disclosure**

Webb & Co Ltd may on occasions pass your Personal Information to third parties exclusively to process work on your behalf. Webb & Co Ltd requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR. Webb & Co Ltd do not broker or pass on information gained from your engagement without your consent. However, Webb & Co Ltd may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. We may also enforce our Terms and Conditions, including investigating



potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of Webb & Co Ltd, its clients and/or the wider community.

## **Retention Policy**

In accordance with the Act, your personal data is only kept for as long as is necessary to fulfil your request for the accountancy and business advisory services provided etc. We are required by various legislation and our insurers to retain your data where we have ceased to act for you and will continue to store only the personal data needed for seven years after the contract has expired to meet any legal obligations. After seven years any personal data not needed will be deleted.

## **Data storage**

Data is held in the UK using different servers and secure storage. Webb & Co Ltd does not store personal data outside the EEA.

## **Protecting your information**

Webb & Co Ltd is committed to protecting information which identifies and relates to you or other individuals (personal information) and complying with data protection laws.

This privacy notices sets out Webb & Co Ltd's personal information collection and sharing practices in relation to the personal information that we collect and use.

Our website contains links to other websites. This privacy policy only applies to our website so when you link to other websites you should read their own privacy policies.

Please note that the transmission of information over the internet or by email is not completely secure and, therefore, we cannot guarantee the security of your data transmitted. On request, we can offer a secure document exchange procedure.

#### Your rights as a data subject

At any point whilst Webb & Co Ltd is in possession of or processing your personal data, all data subjects have the following rights:

- Right of access you have the right to request a copy of the information that we hold about you.
- Right of rectification you have a right to correct data that we hold about you that is inaccurate or incomplete.



- Right to be forgotten in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing where certain conditions apply you have a right to restrict the processing.
- Right of portability you have the right to have the data we hold about you transferred to another organization.
- Right to object you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that Webb & Co Ltd refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

Webb & Co Ltd at your request can confirm what information it holds about you and how it is processed

#### You can request the following information:

- Identity and the contact details of the person or organization (Webb & Co Ltd) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Webb & Co Ltd or a third party such as one of its clients, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (Data Protection Regulator).



- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

### To access personal data held, identification will be required

Webb & Co Ltd will accept the following forms of ID when information on your personal data is requested: a copy of your national ID card, driving license, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Webb & Co Ltd is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to office@webbco.co.uk or by phoning 01749 676604 or writing to us at the address below.

# **Changes to Privacy Notice**

We keep our Privacy notice under review. Any changes to our privacy notice will be posted on our website. A paper copy of the privacy notice may also be obtain from our office address below. This privacy notice was last updated in June 2018.

### **Complaints**

In the event that you wish to make a compliant about how your personal data is being processed by Webb & Co Ltd or its Directors, you have the right to complain. If you do not get a response within 30 days you can complain to the Data Protection Regulator.

The details for each of these contacts are:

Webb & Co Ltd, The Board of Directors

One New Street, Wells, BA5 2LA

Telephone 01749 676604 or email office@webbco.co.uk

**Data Protection Regulator** 

Information Commission Office (ICO)



Wycliffe House, Water Lane

Wilmslow, Cheshire SK9 5AF

Telephone 03031231113 or email: casework@ico.org.uk