

## **Ashdown Hurrey Privacy Policy**

### **Introduction**

Ashdown Hurrey takes its responsibilities with regard to privacy very seriously as a data controller and the regulations applying under the Data Protection Act 2018. This policy is to set out our responsibilities under the act, how we deal with data and how we can be contacted to deal with any questions or complaints which may arise.

### **Client Data**

Ashdown Hurrey collects personal data of its clients (the data subject). This information is generally obtained directly from information provided by clients, but can also be received from other sources, including, but not limited to, HMRC, Companies House and other government agencies, or from other private organisations.

This data includes names, addresses and other contact details, dates of birth, tax references, income and expense details and other tax related information required in order to fulfil our contractual requirements.

As part of our anti-money laundering procedures and know your client approach, we use the services of TransUnion (formerly Callcredit) who are a credit reference agency. For details of the TransUnion Bureau privacy policy notice, please follow this link: <https://www.callcredit.co.uk/legal-information/bureau-privacy-notice>.

The legal basis for processing this data is the fulfilment of our contractual requirements, which includes the completion of tax returns and providing tax and general advice.

The data may also be used to notify clients of information that we feel may be relevant to them or to offer them additional services which we feel may be of interest to them.

Data will only be shared with third parties with the permission of the client, for legal reasons (such as legal requests from HMRC) or if required, for the fulfilment of our contractual obligations using a data processor (such as online software and applications). All data processors used are assessed to ensure that data is kept secure and will only be used for contractual reasons. The security systems in place for data storage are to the highest levels recommended by our IT consultants. These include daily back-ups, firewalls and monitored data protection and data security policies.

The data will be stored while the client remains contracted to Ashdown Hurrey and will be held beyond this period for at least the legally required period by HMRC or other government agencies.

The client has the right to request a copy of their data. The client also has the right to request that this data be deleted, although this right may be overridden by the legal requirement to retain the data for government agencies.

In certain circumstances, HMRC have the ability to enquire into a taxpayer's affairs beyond the normal statutory seven years. In view of this, it is our experience and policy that we will retain data without limit beyond seven years. If a client requests that we delete such data, subject to any other overriding requirement, we will comply with such a request.

### **Marketing Data**

Ashdown Hurrey may collect personal data of non-clients for marketing purposes. This information is generally obtained directly from information provided by the data subject.

This data would usually only consist of names, addresses and other contact details.

The legal basis for processing this data is that consent has been provided.

This data will not be shared with any third parties, except our requirement to use a data processor (such as online software and applications). All data processors used are assessed to ensure that data is kept secure and will only be used for contractual reasons.

The data subject can ask at any time to be removed from our mailing list.

The data subject has the right to request a copy of their data. The data subject also has the right to request that this data be deleted.

### **Data Officer and Contact**

The Data Officer is Jeff Moore and he should be contacted with any complaints or requests regarding the use of personal data. He may be contacted at the Hastings office, 20 Havelock Road, Hastings, TN34 1BP or by email [jeffm@ashdownhurrey.co.uk](mailto:jeffm@ashdownhurrey.co.uk) or by telephone on 01424 720222.