

PRIVACY NOTICE

This Privacy Notice should be read in conjunction with the engagement letter and the terms of business.

1. ABOUT ME AND THE PURPOSE OF THIS NOTICE

- 1.1 John N Allen, Chartered Accountant, ("I", "me", "my" and "mine") is an accountancy and tax advisory firm. I am a practicing Fellow of the Institute of Chartered Accountant and Associate Member of the Chartered Institute of Taxation.
- 1.2 This notice will tell you how I look after your personal data, about your privacy rights, and about my compliance with and your protections under Data Protection Legislation.
- 1.3 In this notice "Data Protection Legislation" means any applicable law relating to the processing, privacy, and use of Personal Data, including the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended by The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020.
- 1.4 For the purpose of the Data Protection Legislation and this notice, I am the 'Data Controller'. This means that I am responsible for deciding how I hold and use personal data about you. I am required under the Data Protection Legislation to notify you of the information contained in this privacy notice.
- 1.5 I am also the firm's Data Protection Officer, which makes me the Data Protection Point of Contact and thus responsible for assisting with enquiries in relation to this privacy notice or me treatment of your personal data. Should you wish to contact me in this capacity you can do so using the contact details noted at paragraph 11 (Contact Me), below.

2. THE TYPE OF INFORMATION I HOLD ABOUT YOU

- 2.1 The information I hold about you may include the following:
 - your personal details such as your name and/or address;
 - details of contact I have had with you in relation to the provision, or the proposed provision, of my services;
 - details of any services you have received from me;
 - my correspondence and communications with you; and
 - information about any complaints and enquiries you make to me.

3. HOW I MAY COLLECT YOUR PERSONAL DATA

- 3.1 I obtain your personal data directly from you when:
 - you engage me to provide my services and also during the provision of those services; and
 - you contact me by email, telephone, post.
- 3.2 I may also obtain your personal data indirectly from third parties and/or publicly available resources for example, from your employer or from Companies House.

4. HOW I USE PERSONAL DATA I HOLD ABOUT YOU

- 4.1 I may process your personal data for purposes necessary for the performance of my contract with you and to comply with my legal obligations.
- 4.2 I may also process your personal data for the purposes of my own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for statistical and management purposes.
- 4.3 Please note that I may process your personal data for more than one lawful basis depending on the specific purpose for which I am using your data.

Situations in which I will use your personal data.
- 4.4 I may use your personal data in order to:
 - carry out my obligations arising from any agreements entered into between you and me which will most usually be for the provision of my services;
 - provide you with information related to my services; and
 - notify you about any changes to my services.
- 4.5 I may also process your personal data without your knowledge or consent, in accordance with this notice, where I am legally required or permitted to do so.

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Data retention.

4.6 I will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

4.7 When assessing what retention period is appropriate for your personal data, I take into consideration the requirements of my business and the services provided, any statutory or legal obligations and the purposes for which I originally collected the personal data.

Change of purpose.

4.8 Where I need to use your personal data for a reason, other than the purpose for which I originally collected it, I will only use your personal data where that reason is compatible with the original purpose. If I need to use your data for a new purpose, I will notify you and communicate our legal basis for this new processing.

5. DATA SHARING

5.1 I will share your personal data with third parties where I am required by law, where it is necessary to administer the relationship between us, or where I have another legitimate interest in doing so. This may include sharing your personal data with a regulator or to otherwise comply with the law.

5.2 "Third parties" includes third-party service providers. The following activities are carried out by third-party service providers: IT and cloud services, professional advisory services, administration services, and banking services. I only permit my third-party service providers to process your personal data for specified purposes and in accordance with my instructions.

5.3 I may also need to share your personal data with a regulator or to otherwise comply with the law.

6. TRANSFERRING PERSONAL DATA OUTSIDE THE UNITED KINGDOM (UK)

6.1 I will not transfer the personal data I collect about you outside of the UK.

7. DATA SECURITY

7.1 I have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, I limit access to your personal data to any other third parties who have a business need to know. They will only process your personal data on my instructions and they are subject to a duty of confidentiality.

7.2 I have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where I am legally required to do so.

7.3 Payment information is never taken by me or transferred to me either through my website or otherwise.

8. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform me of changes.

8.1 It is important that the personal data I hold about you is accurate and current. Should your personal information change, please notify me of any changes of which I need to be made aware by contacting me, using the contact details below.

Your rights in connection with personal data.

8.2 Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data I hold about you and to check that I am processing it lawfully.
- Request correction of the personal data that I hold about you.
- Request erasure of your personal data. This enables you to ask me to delete or remove personal data where there is no good reason for me continuing to process it. You also have the right to ask me to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where I am relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis.
- Request the restriction of processing of your personal data. This enables you to ask me to suspend the processing of personal data about you, for example if you want me to establish its accuracy or the reason for processing it.

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- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.
- 8.3 If you want to exercise any of the above rights, please email me as Data Protection Point of Contact john@jnallen.co.uk.
- 8.4 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, I may charge a reasonable fee for the administrative costs of complying with the request if your request for access is manifestly unfounded or excessive. Alternatively, I may refuse to comply with the request in such circumstances.
- 8.5 I may need to request specific information from you to help me confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

9. RIGHT TO WITHDRAW CONSENT

- 9.1 In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.
- 9.2 Once I have received notification that you have withdrawn your consent, I will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless I have another legitimate basis for doing so in law.

10. CHANGES TO THIS NOTICE

- 10.1 Any changes I may make to my privacy notice in the future will be provided to you by updating on my website at: www.jnallen.co.uk.
- 10.2 This privacy notice was last updated on 10 January 2023.

11. CONTACT ME

- 11.1 If you have any questions regarding this notice or if you would like to speak to me about the way in which I process your personal data, please email me at john@jnallen.co.uk.
- 11.2 You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone - 0303 123 1113 (local rate) or 01625 545 745
Website - <https://ico.org.uk/concerns>