

Leon and Company PRIVACY POLICY

Last updated: 21/05/2018

Leon and Company treats the privacy of its clients, prospective clients and website users very seriously and we take appropriate security measures to safeguard your privacy.

This Policy describes why, and how, we collect and use personal data and provides information about individuals' rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this privacy policy or as otherwise stated at the point of collection.

Personal data is any information relating to an identifiable living person. Leon and Company processes personal data for numerous purposes. For each purpose the means of collection, lawful basis of processing, disclosure, and retention periods may differ.

If you have any questions, please email or write to us, or call us using the 'Contact information' noted at the end of this policy.

In accordance with the Data Protection Act 1998 we are registered with the Information Commissioner's Office (ICO) and our registration number is as follows:

Leon and Company – **Z4882281**

How we obtain your personal data

Information provided by you

We obtain information about you when you engage us to deliver our professional services and when you use our website, for example, when you contact us about our services.

You provide us with personal data via completion of electronic forms, submission of data files or over the telephone. This may also include sensitive information received directly from you in relation to the performance of services we have been engaged to or may be engaged to carry out on your behalf. We may also keep information contained in any correspondence you may have with us by post or by email.

The personal information we collect from you will vary depending on which services you engage us to deliver. The personal information we collect might include your name, address, telephone number, email address, your Unique Tax Reference (UTR) number, your National Insurance number, bank account details, your IP address, which pages you may have visited on our website and when you accessed them.

The provision of this personal data is essential for us to be able to provide those services for which we have been engaged or may be engaged. This means that our lawful basis for holding this personal data is one or more of the following:

'Performance of a contract' i.e. we have agreed under engagement terms to deliver a contract which requires us to hold and process personal information about or on behalf of our clients.

‘Compliance of a legal obligation’ i.e. we are required as our clients engaged advisors to submit certain legal and personal information to HMRC to fulfil our clients legal and statutory obligations.

‘Legitimate interests’ i.e. as accountants, tax advisors, and payroll administrators, Leon and Company have a legitimate interest to share with you relevant information about our services.

Information we get from other sources

We only obtain information from third parties if this is permitted by law. We may also use legal public sources to obtain information about you, for example, to verify your identity, or obtaining data as part of our “professional clearance” procedures from other accountants.

How we use your personal data

We use your personal data to provide, manage and fulfil those services that we have been engaged, or may be engaged to provide to you. At all times we undertake to protect your personal data, in a manner which is consistent with Leon and Company’s duty of professional confidence and the requirements of the General Data Protection Regulation (GDPR) concerning data protection. We will always take all reasonable security measures to protect your personal data in storage and in transit. As applicable, the information you provide may be used to (this list is not exhaustive):

- **Provide professional services** – We provide a diverse range of professional services and tax advice. Some of our services require us to process personal data in order to provide advice and deliver our contract. For example, we may review your staff contracts as part of an audit.
- **Administering, managing and developing our businesses and services** – We process personal data in order to run our business, including:
 - managing our relationship with clients;
 - developing our businesses and services (such as identifying client needs and improvements in service delivery);
 - maintaining and using IT systems;
 - hosting or facilitating the hosting of events; and
 - administering and managing our website and systems and applications.
- **Security, quality and risk management activities** – We have security policies and procedures in place to protect both our own and our clients’ information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails.

We monitor the services provided to clients for quality purposes, which may involve processing personal data stored on the relevant client file. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to client engagements.

We collect and hold personal data as part of our client engagement and acceptance procedures. As part of those procedures we may carry out searches using publicly available sources such as internet searches, etc. These searches are to check that there are no issues that would prevent us from

working with a particular client, such as sanctions, criminal convictions (including in respect of company directors), conduct or other reputational issues.

- **Providing our clients and potential clients with information about us and our range of services** – We use contact details to provide information that we think will be of interest about us and our services. For example, other services that may be relevant and invitations to events.
- **Complying with any requirement of law, regulation or a professional body of which we are a member** – As with any provider of professional services, we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

Sharing information

We will keep information about you confidential and secure. We will never sell, rent or share personal data with any third party unless it is within our lawful basis for doing so and we will never share your data outside of Leon and Company for marketing purposes. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security policies.

Personal data held by us may be transferred to:

- Regulatory authorities like HMRC and other fraud prevention agencies for the purposes of fraud prevention and to comply with any legal and regulatory issues and disclosures;
- Any legal or crime prevention agencies and/or to satisfy any regulatory request if we have a duty to do so or if the law allows us to do so;
- Third party organisations that provide applications/ functionality, data processing or IT services to us, to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud-based accounting software, identity verification, data, data back-up, security and storage services;
- Third party organisations that otherwise assist us in providing goods, services or information within our lawful basis for doing so but will never include sharing data for marketing purposes; This includes agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf, for example to process payroll or basic bookkeeping. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.
- Auditors, other professional advisers and pension administrators.
- Other professional connections (e.g. a will-writer, mortgage advisor, etc) where and when we have been explicitly instructed by yourselves, or indeed we have obtained express, prior

permission from yourself for us to do so; and always for a specific purpose (never speculative).

How you can access and update your information

Keeping your information up to date and accurate is important to us. We commit to regularly review and correct where necessary, the information that we hold about you. If any of your information changes, please email or write to us, or call us using the 'Contact information' noted below.

You have the right to ask for a copy of the information we hold about you. We endeavour to respond to such requests with two months.

Security precautions in place to protect the loss, misuse or alteration of your information

Whilst 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. Where we have given, or where you have chosen, a password which enables you to access information, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Your data will usually be processed in our offices in the UK. However, to allow us to operate efficient digital processes, we sometimes need to store information in servers located outside the UK, but within the European Economic Area (EEA). We take the security of your data seriously and so all our systems have appropriate security in place that complies with all applicable legislative and regulatory requirements.

Your choices

We may occasionally contact you by post, email or telephone with details of any changes in legal and regulatory requirements or other developments that may be relevant to your affairs and, where applicable, how we may assist you further. If you do not wish to receive such information from us, please let us know by contacting us as indicated under 'Contact information' below.

Your rights

Access to your information: You have the right to request a copy of the personal information about you that we hold. We endeavour to respond to such requests with two months.

Correcting your information: We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

Deletion of your information: You have the right to ask us to delete personal information about you where:

- you consider that we no longer require the information for the purposes for which it was obtained
- you have validly objected to our use of your personal information - see 'Objecting to how we may use your information' below
- our use of your personal information is contrary to law or our other legal obligations
- we are using your information with your consent and you have withdrawn your consent - see 'withdrawing consent to use your information' below.

Restricting how we may use your information: In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you

have made to our use of your information. The right might also apply where there is no longer a basis for using your personal information but you do not want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Objecting to how we may use your information: Where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

Please contact us in any of the ways set out in 'Contact information' below if you wish to exercise any of these rights.

Important information

Contact information

If you have any questions or queries which are not answered by this privacy policy please write to the Data Protection Officer at Leon and Company, 100 High Ash Drive, Leeds, LS17 8RE or email darren@leonandcompany.co.uk

Policy changes

This privacy policy is regularly reviewed to make sure that we continue to meet the highest standards and to protect your privacy. We reserve the right, at all times, to update, modify or amend this Policy. We will notify our data subjects of any significant changes.

Complaints

We seek to resolve directly all complaints about how we handle your personal information, but you also have the right to lodge a complaint with the Information Commissioner's Office at:

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>