

PRIVACY NOTICE

This notice describes how Hughes Collett collect and use personal data about you, in accordance with the UK General Data Protection Regulation (GDPR), the Data Protection Act 2018 and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK ('Data Protection Legislation').

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

Hughes Collett takes the protection of your privacy very seriously. We will only use your personal information to deliver the services you have requested from us, and to meet our legal responsibilities.

HOW DO WE COLLECT INFORMATION FROM YOU?

We obtain information about you when you engage us to deliver our services.

Information may be obtained about you when you use our website, for example, when you contact us about our services or when you download our monthly newsletter, for example, which articles you have visited and when you accessed them.

WHAT TYPE OF INFORMATION DO WE COLLECT FROM YOU?

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, date of birth, address, telephone number, email address, your job and financial circumstances and Unique Tax Reference (UTR) number, your National Insurance number and banking details.

HOW IS YOUR INFORMATION USED?

In general terms, and depending on which services you engage us to deliver, as part of providing our agreed services we may use your information to:

- contact you by post, email or telephone
- verify your identity where this is required
- understand your needs and how they may be met
- maintain our records in accordance with applicable legal and regulatory obligations
- process financial transactions
- report financial transactions to HMRC and communicate with them as necessary
- prevent and detect crime, fraud or corruption

If you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered into with you. Alternatively, we may be unable to comply with our legal or regulatory obligations.

We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

We are required by legislation, other regulatory requirements and our insurers to retain your data where we have ceased to act for you. The period of retention required varies with the applicable legislation but is typically five or six years. To ensure compliance with all such

requirements it is the policy of the firm to retain all data for a period of seven years from the end of the period concerned.

WHO HAS ACCESS TO YOUR INFORMATION?

- We will not sell or rent your information to third parties.
- We will not share your information with third parties for marketing purposes.
- Any staff with access to your information have a duty of confidentiality under the ethical standards that this firm is required to follow.

THIRD PARTY SERVICE PROVIDERS WORKING ON OUR BEHALF

We may pass your information to our third party service providers, 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, for example, our website and newsletter provider, 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.

Please be assured that we will not release your information to third parties unless you have requested that we do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention and detection of crime, fraud or corruption.

HUGHES COLLETT WEBSITE

Hughes Collett does not collect and store any personal information about individuals who access our website, except where you voluntarily provide your personal details via email, or by using the website's electronic form, or enquiring about any of our services. In these circumstances, any personal information you supply will only be used to provide the information or service you have requested.

Please note that, unless encrypted, email messages sent via the internet may not be secure and could be intercepted and read by someone else. Please bear this in mind if you intend to include personal or sensitive information in an email you send to us.

Personal information is not disclosed to third parties unless indicated clearly to you.

SECURITY PRECAUTIONS IN PLACE TO PROTECT THE LOSS, MISUSE OR ALTERATION OF YOUR INFORMATION

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.

Whilst we strive to protect your personal information and will take all reasonable steps to ensure your information is treated securely and in accordance with this policy, 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.

We have an arrangement with an outsourcing firm Regent Services Ltd (who operate an outsourcing operation in Lahore, Pakistan). We may need to transfer the personal or corporate data we collect about you to Pakistan in order to perform the services for you as set out in our Terms of Engagement.

As there is not an adequacy decision by the European Commission in relation to Pakistan the country is not deemed to provide an adequate level of protection for your personal information for the purpose of the Data Protection Legislation.

Transfers of personal or corporate data to Regent Services Ltd will be covered by a subcontractors agreement which gives specific contractual protections designed to ensure that your personal data receives an adequate and consistent level of protection.

YOUR CHOICES

We may occasionally contact you by post or 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.

Our Newsletters: We routinely contact clients to obtain consent to send them a monthly newsletter. Those wishing to unsubscribe may do so at any time by contacting us as indicated under contact information below.

YOUR RIGHTS & HOW YOU CAN ACCESS AND UPDATE YOUR INFORMATION

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.

Access to your information: You have the right to request a copy of the personal information about you that we hold.

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.

Withdrawing consent to use your information: Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

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

CHANGES TO OUR PRIVACY NOTICE

We keep this privacy notice under regular review and will place any updates on <http://www.hughescollett.co.uk/>. Paper copies of the privacy notice may also be obtained from us at the contact details below.

This privacy notice was last updated in May 2018

CONTACT INFORMATION

Hughes Collett Limited
Bridge House,
11 Creek Road,
East Molesey,
Surrey, KT8 9BE.

Tel 020 8941 4455

Email: francis@hughescollett.co.uk

Website: <http://www.hughescollett.co.uk/>

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>