

Breslins Privacy Policy

Breslins is committed to protecting and respecting your personal data and privacy. We only use your personal information to deliver the services you have requested from us and to meet our legal responsibilities.

This privacy policy relates to our use of any personal data we collect from you from any of our services. Whenever you provide such information, we are legally required to use your information in line with all applicable laws concerning the protection of personal data.

The General Data Protection Regulation (GDPR) ensures that we only use your personal information, if we have a legitimate reason to do so. This includes sharing information outside of Breslins.

The law states that we must have one or more of the following reasons for using your personal data to fulfil the contract we have with you to provide our services:

- Where it is our **legal requirement**
- When it is in **our permitted interest**
- When you **agree to the use of the data**

Where we act as a data processor, on behalf of a data controller, such as processing payroll, we provide the details of this within our **Terms of Business**.

Your Rights

Under the General Data Protection Regulation, your data rights are as follows:

To be **informed** of data changes, to **access** data, to **amend** data, to **delete** data, to **restrict** data, to **transfer** data and **object** data.

The Data We Collect

The data we handle includes the following: **name, address, telephone numbers, date of birth, family relationships** and **email addresses**. It also may include **your IP address** and **cookies** via our website.

We collect personal data from you in relation to providing our services to you, including details relating to your tax affairs, bank accounts, investments, payroll information, accounting records and other statutory returns.

We may require documentary details from you such as a **Driving Licence, Passport** or **Utility Bill**, to meet with our obligations under identification, money laundering and anti-terrorism legislation. Our collection methods are as follows:

- Our **website**
- **Engagement** (or potential engagement) **of our services**
- **Communications** - via email, telephone, post, networking or social media
- **Service Providers**
- **Third parties or available public resources** (Companies House or Employers)

When using digital services, such as our website or other digital services, we collect data from you using cookies and other internet tracking software, such as Google Analytics. The purpose of this is to understand how you use our services, and to provide you with better information.

How We Use Your Data

We use information held about you to:

- **Provide services** to you (or your employer or our client) under a contract and as set out in our Terms of Business

- **Ensure** that content from our website is presented in the most effective manner for you and your devices
- **Provide** you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes or by legitimate interests
- **Allow** you to participate in interactive features of our service when you choose to do so, eg. asking a question through our website
- **Carry out** necessary maintenance to our infrastructure
- **Notify** you about changes to our services
- **Meet our legal obligations** including money laundering and identification checks, complying with antiterrorism financing and Criminal Finances Act legislation, and use in the investigation and/or defence of potential complaints, disciplinary proceedings and legal proceedings
- **Permit** us to invoice you for our services and investigate or address any attendant fee disputes that may have arisen

If you refuse to provide us with certain information when requested, we may not be able to fulfil the contract we have entered 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 also embrace the use of social media and may wish to process any comments made public by you.

Permitted Interest and Marketing

We may process your personal data for the purpose of our own permitted 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 for marketing, business development, statistical and management purposes.

- If you are an existing client or contact, we will send you information about other products, events and services that we feel may be of interest to you. You have a right to ask us to stop contacting you for marketing purposes at any time.
- On no occasion will we sell your data to a third party for marketing purposes.

How We Share Your Data

We share your information within Breslins for administration purposes to develop ways to meet our clients' needs and to carry out marketing activities. Otherwise, your information is retained within Breslins, except where disclosure is required or permitted by law or when we use third party service providers (data processors) to supply and support our services to you.

We may also pass your data to third party external organisations where we are required to by law, where it is necessary to administer the relationship between us or where we have another permitted interest in doing so.

We use third party service providers such as agents, subcontractors and other organisations to help us provide services to you. These include:

- **Cloud accounting services** (Xero, Sage and Quickbooks)
- **Payroll providers** (Xero, Sage, Sage products, and IRIS)
- **Email and Secure document exchange systems** (Example Microsoft and SharePoint)
- **Marketing/Research agencies** (Example Mailchimp and Telemarketing)

All our third-party service providers are required to take reasonable and appropriate security measures to protect your personal data. We only permit our third party service providers to process your personal data for specified purposes and in accordance with our instructions.

As part of the services we offer to you, we may send your data outside of the European Economic Area (EEA). Where this is the case, we will take reasonable steps to ensure that your data is protected in the same way as if it was being used in the EEA. For example, where third party suppliers store data in the US, we will ensure that their services fall within the Privacy Shield: www.privacyshield.gov.

Holding Your Data

We only hold your personal data for as long as necessary to carry out the purpose for which it is collected. When assessing the holding period which is appropriate for your personal data, we take into consideration:

- Requirements of our business and the services provided
- Statutory/legal obligations
- Purposes for which we originally collected the personal data
- Lawful grounds on which we based our processing
- Types of personal data we have collected
- Amount and categories of your personal data

Deleting Your Data

Under GDPR, you have the right to request your personal data be erased under specific circumstances. Any request for your personal data to be deleted will be decided on a case by case basis and must be submitted to Breslins in writing.

Correcting Your Data

We correct or update your data at the earliest opportunity, providing you make the request in writing, to the contact details provided in this policy, clearly specifying which data is incorrect or out of date.

Your Data Security

We have appropriate security measures in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They only process your personal data on our instructions and are subject to a duty of confidentiality.

We have procedures in place to deal with any suspected data security breach and notify you, and any applicable regulator, of a suspected breach where we are legally required to do so.

Inspection of Your Data

We strive to be as open as we can be in terms of giving people access to their personal data. A Subject Access Request under GDPR is your right to request a copy of the information we hold on you. Such requests must be in writing to the contact details provided in this policy. If we hold your personal data, we will respond in writing within one calendar month of your request. The personal information we supply to you, will include the following:

Confirm the **purpose**, verify the **lawfulness**, confirm the **reasons** why and to whom your data has been disclosed.

Please note that you may need to provide **identification** to prove who you are to access your data.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone. If we do not hold information about you, we will also confirm this in writing at the earliest opportunity.

Privacy Policy Changes

We keep our privacy policy under review and you should check regularly to ensure you are aware of any changes to it. We may display this privacy policy to you from time to time to help ensure you are aware of its contents. We may amend this privacy policy at any time. If so, we will place any updates on our website at www.breslins.co.uk. A PDF copy is available.

Withdraw Your Consent

Where you have consented to us processing your personal data, you have the right to withdraw that consent at any time. Please inform us immediately if you wish to withdraw your consent.

Please note, if you withdraw your consent, we may not be able to continue to provide our services to you. However, withdrawal of your consent does not affect our earlier processing of your personal data.

Even if you withdraw your consent, we may have to process your data on another legal basis (because we have a legal obligation to continue to process your data).

Complaints

You have the right to complain about the processing of your personal data. If you have any complaints, please contact Breslins.

If you are still unsatisfied, you have the right to complain to the Information Commissioners Office at: <https://ico.org.uk/concerns>.

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