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1. ABOUT THIS POLICY

The main purpose of this policy is to provide clear information about how Specialist Accounting Solutions Ltd (“SAS”; “us”; “we”) handles the data it holds about current, potential and past employees, customers, suppliers and partners. Specialist Accounting Solutions Ltd is strongly committed to protecting personal data and aims to provide transparency about what data we hold, for what purpose it will be used and how we keep it secure.

This policy 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 notice or as otherwise stated at the point of collection.

We collect and use personal data about visitors to our website, clients, referrals suggested to us, employees, contractors and others with whom we work, those who get in touch with us and relevant others with whom we come into contact (“you”) in accordance with the General Data Protection Regulation 2018 (GDPR) and 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’).

Specialist Accounting Solutions Ltd will use information we collect in accordance with the General Data Protection Regulation 2018 and the Privacy and Electronic Communications regulations. The seven key principles of GDPR set out below lie at the heart of how we process data:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability.

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

Who does this policy apply to?

This policy will be followed by everyone working with, for, or on behalf of Specialist Accounting Solutions Limited including employees, freelancers, suppliers and clients.

2. ABOUT SPECIALIST ACCOUNTING SOLUTIONS LTD

Specialist Accounting Solutions Ltd offers business advisory and accounting services which comply with the General Data Protection Regulation (GDPR) 2018. Specialist Accounting Solutions Ltd is an incorporated body.

For the purpose of the Data Protection Legislation and this notice, we are the 'data controller'. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

We have appointed a data protection officer. Our data protection officer is our data protection point of contact and is responsible for assisting with enquiries in relation to this privacy notice or our treatment of your personal data. Should you wish to contact our data protection point of contact you can do so using the contact details included in this policy.

3. WHAT LAWFUL BASIS DO WE USE FOR PROCESSING PERSONAL DATA?

We may rely on the following lawful reasons when we collect and use personal data to operate our business and provide our products and services:

Contract – We may process personal data in order to perform our contractual obligations owed to (or to enter into a contract with) the relevant individuals.

Consent - We may rely on your freely given consent at the time you provided your personal data to us.

Legitimate interests – We may rely on legitimate interests based on our evaluation that the processing is fair, reasonable and balanced. These may include:

- *Delivering services to our clients* – To deliver the professional services our clients have engaged us to provide.
- *Direct marketing* – To deliver timely market insights and speciality knowledge we believe is welcomed by our business clients, subscribers and individuals who have interacted with us
- *HR and payroll management*- To manage recruitment, personal and career development, salary, pension and other payments and to manage employee relations matters

Legal obligations – We may process personal data in order to meet our legal and regulatory obligations or mandates.

4. WHAT CATEGORIES OF PERSONAL DATA DO WE COLLECT?

We may obtain the following categories of personal data about individuals through direct interactions with us, or from information provided through client engagements, from applicants, our suppliers and through other situations including those described in this Privacy and Cookies Policy.

- Personal data. Here is a list of personal data we commonly collect to conduct our business activities.
 - Contact details (e.g., name, company name, job title, work and mobile telephone numbers, work and personal email and postal address).
 - Professional details (e.g., job and career history, educational background and professional memberships, published articles).

- Financial information (e.g., taxes, payroll, bank details).
- Sensitive personal data. We typically do not collect sensitive or special categories of personal data about individuals other than our own employees. When we do need to process sensitive personal data from data subjects who are not our employees, it is either on the instructions of a third party, with the express consent of the individuals or as required by law. Examples of sensitive personal data we may obtain, or otherwise hold, include:
 - Personal identification documents that may reveal race, religion or ethnic origin, possibly biometric data of private individuals, beneficial owners of corporate entities, or applicants.
 - Expense receipts submitted for individual tax or accounting advice that reveal affiliations with trade unions or political opinions.
 - Information provided to us by our clients in the course of a professional engagement.

5. HOW WE COLLECT YOUR PERSONAL DATA

We obtain personal data about you, for example, when:

- You request a proposal from us in respect of the services we provide.
- You contact us by email, telephone, post or social media (for example when you have a query about our services).
- We obtain it from third parties and/or publicly available resources (for example, from your employer or from Companies House).
- You apply for a job and when you are recruited.

6. THE KIND OF INFORMATION WE HOLD ABOUT YOU

The information we hold about you may include the following:

- Your personal details (such as your name and/or address).
- Details of contact we have had with you in relation to the provision, or the proposed provision, of our services.
- Details of any services you have received from us.
- Our correspondence and communications with you.
- Information about any complaints and enquiries you make to us.
- Information from research, surveys, and marketing activities.
- Information we receive from other sources, such as publicly available information, information provided by your employer or our clients.
- Employee information such as salary and benefit data, next of kin contact information, information relating to your employment (including disciplinary record, sickness record, complaints you have made), employment history.

7. HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU

We may process your personal data for purposes necessary for the performance of our contract (if any) with you; to undertake the work of our network and to comply with our legal obligations.

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

We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

8. SITUATIONS IN WHICH WE USE YOUR PERSONAL DATA

We may use your personal data in order to:

- Carry out our obligations arising from any agreements entered into between you and SAS (which will most usually be for the provision of services)
- Carry out our obligations arising from any agreements entered into between clients of SAS and SAS (which will most usually be for the provision of our services) where you may be a subcontractor, supplier or customer of the client
- Carry out our obligations arising from legal obligations such as Anti-Money Laundering regulations;
- Provide you with information related to our services and our events and activities that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes.
- Seek your thoughts and opinions on the services we provide.
- Notify you about any changes to our services.
- Manage employment matters.

In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

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.

9. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We retain personal data to provide our services, stay in contact with you and to comply with applicable laws, regulations and professional obligations that we are subject to. Details of how long we retain your data is listed in the table below.

Data Retention Table 1.0

Record Category	Description	Retention Period	Reason for Retention Period	Allowable Storage Media
All clients	Client information including addresses, names, DOB,	8 years after termination	Legal	Electronic

	copies of passports			
Opted in potential leads	Email, name, contact number information	3 years if not converted to client or unsubscribed	Legitimate interest	Electronic
Business Services clients	Historical financial record, including clients' own accounts and records	8 years.	Legal	Electronic only – paper records must be scanned and then destroyed or returned to the client
Payroll	Client payroll information	8 years	PAYE	Electronic
Contractual	Legal contracts, terms and conditions, leases	8 years after contract end	Maximum period within which dispute might occur	Electronic/Paper
Supplier	Supplier names, addresses, company details, invoices	8 years after end of supply	Maximum period within which dispute might occur	Electronic/Paper
Employment Matters / Human Resources	Employee names, addresses, bank details, tax codes, pension information	8 years after date of collection. Where data needs to be retained for longer (such as pension information etc) it will be validated after the stated number of years, and in effect collected again.'	Legal	Electronic/Paper
Employment Matters / Human Resources	Employment history, medical matters, employee relations matters, equal opportunities monitoring information.	8 years after date of collection. Where data needs to be retained for longer (such as next of kin information etc) it will be validated after the stated number of years, and in effect collected again.	Legal	Electronic/Paper

Note

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

When assessing what retention period is appropriate for your personal data, we take into consideration:

- The requirements of our business and the services provided.
- Any statutory or legal obligations.
- The purposes for which we originally collected the personal data.
- The lawful grounds on which we based our processing.
- The types of personal data we have collected.
- The amount and categories of your personal data.
- Whether the purpose of the processing could reasonably be fulfilled by other means.

10. DO WE SHARE PERSONAL DATA WITH THIRD PARTIES?

We may sometimes share personal data with trusted third parties to help us deliver efficient and quality services or to provide employment related services. These recipients are contractually bound to safeguard the data we entrust to them. We may engage with several or all of the following categories of recipients:

- Parties that support us as we provide our services (e.g., anti-money laundering/ KYC searches, providers of telecommunication systems, mailroom support, IT system support, archiving services, document production services and cloud-based software services).
- Our professional advisers, including lawyers and insurers.
- Funders such as banks, lenders and institutional investors.
- Payment services providers (e.g. payment providers connected to accounting software).
- Marketing services providers (HubSpot CRM database).
- Law enforcement or other government and regulatory agencies (e.g., HMRC) or to other third parties as required by, and in accordance with, applicable law or regulation.
- Payroll and pension providers.

Do we transfer your personal data outside the UK?

We store personal data on servers located in the UK and European Union. We may transfer personal data to reputable third-party organisations within the UK when we have a business reason to engage these organisations and a lawful basis for making such transfer. We may transfer personal data to reputable third-party organisations outside the UK when we have a business reason to engage these organisations, a lawful basis for making such transfer and an appropriate mechanism in place to enable such international transfer (eg reliance on an adequacy ruling or under the terms of an appropriate data transfer contract). Each organisation is required to safeguard personal data in accordance with our contractual obligations and data protection legislation.

11. USE OF COOKIES

Specialist Accounting Solutions Limited is committed to protecting your and any data that we collect about you online. This section tells you how we use cookies, why and how this allows

us to improve our service. It also tells you how you can manage cookies stored on your computer or device.

Where cookies are used on our website, a statement will be sent to your browser explaining the use of cookies.

The cookies we use on our website include those from third party sites Google Analytics and Hubspot.

Our website is hosted by <https://krystal.uk>

By using our website you agree that this Cookies Policy applies along with any other terms and conditions which may apply.

We reserve the right to make changes to our Cookies Policy which become effective immediately. Your continued use of our website means that you agree to any such changes.

What are Cookies?

Cookies are small files that a site or its services provider transfers to your computer through your web browser (if you allow) that enables the sites or service providers systems to recognise your browser and capture and remember certain information. We use cookies to compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We employ the widely-used tool, Google Analytics.

You can disable cookies in your web browser. For more information see aboutcookies.org.uk

Following a link to other websites

If you go to another website via the Specialist Accounting Solutions site or social media channels, read the privacy policy on that website to find out what it does with your information. Specialist Accounting Solutions Limited accepts no liability for the content or information on any external websites.

12. YOUR DATA PROTECTION RIGHTS

- **Access** – You can ask us to verify whether we are processing personal data about you, and if so, to provide more specific information.
- **Correction** – You can ask us to correct our records if you believe they contain incorrect or incomplete information about you.
- **Erasure** – You can ask us to erase (delete) your personal data after you withdraw your consent to processing or when we no longer need it for the purpose it was originally collected.
- **Processing restrictions** – You can ask us to temporarily restrict our processing of your personal data if you contest the accuracy of your personal data, prefer to restrict its use rather than having us erase it, or need us to preserve it for you to establish, exercise, or defend a legal claim. A temporary restriction may apply while verifying whether we have overriding legitimate grounds to process it. You can ask us to inform you before we lift that temporary processing restriction.
- **Data portability** – In some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another company if it is technically feasible.
- **Automated Individual Decision-making** – You can ask us to review any decisions made about you which we made solely based on automated processing, including profiling, that produced legal effects concerning you or similarly significantly affected you.

- **Right to Object to Direct Marketing including Profiling** – You can object to our use of your personal data for direct marketing purposes, including profiling. We may need to keep some minimal information to comply with your request to cease marketing to you.
Right to Withdraw Consent – You can withdraw your consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or services to you and we will advise you if this is the case.

13. REQUESTS, CONTACT DETAILS AND FURTHER INFORMATION

Please get in touch with us if you have any questions about any aspect of this policy, and in particular if you would like to object to any processing of your personal information that we carry out for our legitimate organisational interests.

Data Protection enquiries and requests should be sent to – Maria Trevis

Specialist Accounting Solutions Ltd, 3rd Floor, The Blade, Abbey Square, Reading RG1 3BE
dataprivacy@teamsas.co.uk.

For access requests, to contact us or make a complaint, please contact:

dataprivacy@teamsas.co.uk

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. Let us know what right you are exercising and the data it relates to.

This helps us to ensure that personal data is not disclosed to any person who has no right to receive it. No fee is required to make a request unless your request is clearly unfounded or excessive. Depending on the circumstances, we may be unable to comply with your request based on other lawful grounds.

The process for dealing with breaches of personal data

If there is a breach please contact the Data Protection Officer in the organisation, they will take action on behalf of Specialist Accounting Solutions Limited. This may include contacting the Information Commissioners Office (ICO), contacting the individuals concerned and taking any further action necessary to secure the data and prevent any further breaches.

Changes to this policy

This policy will be reviewed annually.