

Privacy Policy

Last Updated 19 May 2018

Metherell Gard Ltd (“MG”, “we” or “us”) is dedicated to protecting the confidentiality and privacy of information entrusted to us. We comply with the EU General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018. Please read this Privacy Policy to learn about your rights, what information we collect, how we use and protect it.

1. Who are we?

This Privacy Policy applies to MG, Burn View Bude Cornwall EX23 8BX and MG Trustees Ltd of the same address.

2. Who can you contact for privacy questions or concerns?

If you have questions or comments about this Privacy Policy or how we handle personal data, please direct your correspondence to: Data Protection and Privacy Office, Burn View Bude Cornwall EX23 8BX. We aim to respond within 30 days from the date we receive privacy-related communications.

You may contact the UK Information Commissioner’s Office at <https://ico.org.uk/concerns/handling/> to report concerns you may have about our data handling practices.

3. How do we collect personal data?

- **Directly.** We obtain personal data directly from individuals in a variety of ways, including obtaining personal data from individuals who provide us their business card, register for seminars, attend meetings or events we host, visit our offices or apply for open roles. We may also obtain personal data directly when, for example, we are establishing a business relationship, performing professional services through a contract, or through our hosted software applications.
- **Indirectly.** We obtain personal data indirectly about individuals from a variety of sources, including recruitment services and our clients. We may attach personal data to our customer relationship management records to better understand and serve our business clients, subscribers and individuals, satisfy a legal obligation, or pursue our legitimate interests.
 - *Public sources* -- Personal data may be obtained from public registers (such as Companies House), news articles, sanctions lists, and Internet searches.
 - *Business clients* -- Our business clients may engage us to perform professional services which involves sharing personal data they control as part of that engagement. For example, we will review payroll data as part of an audit. Our services may also include processing personal data under our clients’ control on our hosted software applications, which may be governed by different privacy terms and policies.
 - *Recruitment services.* We may obtain personal data about candidates from an employment agency, and other parties including former employers, and credit reference agencies.

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 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).
 - Family and beneficiary details for insurance and pension planning services (e.g., names and dates of birth).
 - Financial information (e.g., taxes, payroll, investment interests, pensions, assets, bank details, insolvency records).
- Sensitive personal data. We typically do not collect sensitive or special categories of personal data about individuals. When we do need to process sensitive personal data, it is with the consent of the individual unless it is obtained indirectly for legitimate purposes. Examples of sensitive personal data we may obtain include:
 - Dietary restrictions or access requirements when registering for in-person events that reveal religious beliefs or physical health.
 - Personal identification documents that may reveal race or ethnic origin, and 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.
 - Adverse information about potential or existing clients and applicants that may reveal criminal convictions or offences information.
 - Information provided to us by our clients in the course of a professional engagement.
- Child data. Although we do not intentionally collect information from individuals under 13 years of age, we may occasionally receive details about children

5. What lawful reasons do we have 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.
- 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 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.
- Legal obligations and public interests – We may process personal data in order to meet regulatory and public interest obligations or mandates.

6. Why do we need personal data?

We aspire to be transparent when we collect and use personal data and tell you why we need it, which typically includes:

- Providing professional advice and delivering reports related to our tax, advisory, audit and assurance, pension scheme administration, restructuring, mergers and acquisitions and other professional services. Our services may include reviewing client files for quality assurance purposes, which may involve processing personal data for the relevant client.
- Promoting our professional services, products and capabilities to existing and prospective business clients.
- Sending invitations and providing access to guests attending our events and seminars or our sponsored events.
- Administering, maintaining and ensuring the security of our information systems, applications and websites.
- Seeking candidates, for vacancies, which may be governed by different privacy terms and policies.
- Processing requests, including responding to communications from individuals or requests for proposals and quotations.
- Complying with legal and regulatory obligations relating to countering money laundering, terrorist financing, fraud and other forms of financial crime.

7. Do we share personal data with third parties?

We may occasionally share personal data with trusted third parties to help us deliver efficient and quality 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., 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.
- Payment services providers.
- 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.

8. Do we transfer your personal data outside the European Economic Area?

We store personal data on servers located in the European Economic Area (EEA). We may transfer personal data to reputable third party organisations situated inside or outside the EEA when we have a business reason to engage these organisations. Each organisation is required to safeguard personal data in accordance with our contractual obligations and data protection legislation.

9. Do we use cookies?

Our website does not use cookies.

10. What are your data protection rights?

Your data protection rights are highlighted here. To submit a data request please write or email us at bude@mgard.co.uk

- 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.
- 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.

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. 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.

11. What about personal data security?

We have put appropriate technical and organisational security policies and procedures in place to protect personal data (including sensitive personal data) from loss, misuse, alteration or destruction. We aim to ensure that access to your personal data is limited only to those who need to access it. Those individuals who have access to the data are required to maintain the confidentiality of such information. We may apply pseudonymisation, de-identification and anonymisation techniques in efforts to further protect personal data.

If you have access to parts of our online services, you remain responsible for keeping your user ID and password confidential. Please be aware that the transmission of data via the Internet is not completely secure. Whilst we do our best to try to protect the security of your personal data, we cannot ensure or guarantee the security of your data transmitted to our site; any transmission is at your own risk.

12. How long do we retain 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. Unless a different time frame applies as a result of business need or specific legal, regulatory or contractual requirements, where we retain personal data in accordance with these uses, we retain personal data for seven years. We will dispose of personal data in a secure manner when we no longer need it.

13. Do we link to other websites?

Our website may contain links to other sites. Please review the destination websites' privacy policies before submitting personal data on those sites. We are not responsible for the content, security, or privacy practices employed by other sites.

14. Do we change this privacy policy?

We annually review this Privacy Policy and will update you of any major amendments. You can ask us to provide you with the latest version at any time. This Privacy Policy was last updated 19th May 2018.