



# Danbro Accounting Limited

## Data Protection and Privacy Notice

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# 1. WHAT IS THE PURPOSE OF THIS DOCUMENT?

## 1.1 Key points:

- (a) Danbro Accounting Limited ('Danbro') is committed to protecting the privacy and security of your personal information.
- (b) This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

## 1.2 In more detail:

- (a) Danbro is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.
- (b) We may update this notice at any time, but if we do, we will provide you with an updated copy of this notice as soon as reasonably practicable.
- (c) It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

# 2. DATA PROTECTION PRINCIPLES

## 2.1 We will comply with data protection law. This says that the personal information we hold about you must be:

- (a) Used lawfully, fairly and in a transparent way.
- (b) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- (c) Relevant to the purposes we have told you about and limited only to those purposes.
- (d) Accurate and kept up to date.
- (e) Kept only as long as necessary for the purposes we have told you about.
- (f) Kept securely.

## 3. THE KIND OF INFORMATION WE HOLD ABOUT YOU

### 3.1 Key points:

- (a) Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- (b) There are “special categories” of more sensitive personal data which require a higher level of protection, such as information about a person’s health or information about criminal convictions.

### 3.2 In more detail:

- (a) We may collect, store, and use the following categories of personal information about you:
  - (i) Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
  - (ii) Date of birth.
  - (iii) Gender.
  - (iv) Marital status and dependents.
  - (v) National Insurance number.
  - (vi) Bank account details, payroll records and personal tax information.
  - (vii) Copy of passport/driving licence/home address verification.

## 4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

4.1 We typically collect personal information directly from you during our on-boarding process. We may collect additional information from a third party in order to confirm your identity as a part of our Anti Money Laundering process.

## 5. HOW WE WILL USE INFORMATION ABOUT YOU

### 5.1 Key points:

- (a) We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:
  - (i) To enable us to provide an accountancy service to you.
  - (ii) Where we need to comply with a legal obligation.
  - (iii) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
  - (iv) Where we are legally permitted to do so and we have your informed or (in certain circumstances) explicit consent.

- (b) We may also use your personal information in the following situations, which are likely to be rare:
- (i) Where we need to protect your interests (or someone else's interests).
  - (ii) Where it is needed in the public interest or for official purposes.

## 5.2 Situations in which we will use your personal information

(a) We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- (i) Passing your contact details to Danbro Financial Planning and/or Danbro Workforce Solutions with your consent.
- (ii) Administering the contract we have entered into with you, details of which are contained in our Letter of Engagement.
- (iii) Business operation, management, and planning, including accounting and auditing.
- (iv) To prevent fraud.
- (v) To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- (vi) To demonstrate our own compliance with legal obligations, to third parties who themselves have legitimate interests in satisfying themselves as to our compliance.
- (vii) To manage and maintain any applicable insurance policies.
- (viii) To carry out identity and Anti-Money Laundering checks.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

## 5.3 If you fail to provide personal information

(a) If you fail to provide certain information when requested, we may not be able to perform the agreement we have entered into with you or we may be prevented from complying with our legal obligations.

## 5.4 Change of purpose

(a) We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

(b) Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 6. DATA SHARING

### 6.1 Key points:

- (a) We may have to share your data with third parties, including third-party service providers and other entities in the group.
- (b) We require third parties to respect the security of your data and to treat it in accordance with the law.
- (c) We may transfer your personal information outside the UK.
- (d) If we do, you can expect a similar degree of protection in respect of your personal information.

### 6.2 Why might you share my personal information with third parties?

- (a) We may share your personal information with third parties;
  - (i) where required by law,
  - (ii) to administer the working relationship with you,
  - (iii) to demonstrate our own compliance with legal obligations, to third parties who themselves have legitimate interests in satisfying themselves as to our compliance,
  - (iv) to manage and maintain any applicable insurance policies
  - (v) to verify your identity
  - (vi) where we have your informed consent, or
  - (vii) where we have another legitimate interest in doing so.

### 6.3 Which third-party service providers process my personal information?

- (a) "Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. The following activities are carried out by third-party service providers: Identification Verification and Anti-Money Laundering checks.

### 6.4 How secure is my information with third-party service providers and other entities in our group?

- (a) All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### 6.5 When might you share my personal information with other entities in the group?

- (a) We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data. In addition, if you want to access other entities in our group for the services they offer.

## 6.6 What about other third parties?

- (a) We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. In this situation we will, so far as possible, share anonymised data with the other parties before transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.
- (b) We may also need to share your personal information with a regulator or to otherwise comply with the law. This may include making returns to HMRC, disclosures to stock exchange regulators (including a Regulatory News Service) and disclosures to shareholders such as directors' remuneration reporting requirements.

## 6.7 Transferring information outside the UK

- (a) We may transfer the personal information we collect about you outside the UK in order to perform our contract with you. We will only do this if the agency/end client that you are working through is not based in the UK and are instead based in the EU and where there are adequacy regulations in respect of those countries. This means that the countries to which we transfer your data are deemed to provide an adequate level of protection for your personal information.
- (b) With your explicit consent (for example in connection with a specific application for work), we may also transfer personal information we collect about you to other countries outside the UK, regardless of the possible risks of such transfer for you due to the absence of an adequacy decision and appropriate safeguards.

# 7. DATA SECURITY

## 7.1 Key points:

- (a) We have put in place measures to protect the security of your information. Details of these measures are available upon request.
- (b) Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

## 7.2 In more detail:

- (a) We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Data Protection Officer.
- (b) We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

# 8. DATA RETENTION

## 8.1 How long will you use my information for?

- (a) We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our Data Retention Policy. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- (b) In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a client of the company we will retain and in due course securely destroy your personal information in accordance with our Data Retention Policy.

## 9. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

### 9.1 Your duty to inform us of changes

- (a) It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

### 9.2 Your rights in connection with personal information

- (a) Under certain circumstances, by law you have the right to:
- (i) Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
  - (ii) Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
  - (iii) Request the erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
  - (iv) Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
  - (v) Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
  - (vi) Request the transfer of your personal information to another party.
- (b) If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer.



### 9.3 No fee usually required

(a) You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### 9.4 What we may need from you

(a) 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 is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## 10. RIGHT TO WITHDRAW CONSENT

**10.1** In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer by emailing [data.officer@danbro.co.uk](mailto:data.officer@danbro.co.uk). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## 11. DATA PROTECTION OFFICER

**11.1** We have appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

**11.2** The Data Protection Officer can be contacted by emailing [data.officer@danbro.co.uk](mailto:data.officer@danbro.co.uk) or writing to them at Danbro, Jubilee House, Lytham St Anne's, Lancashire FY8 5FT.

## 12. CHANGES TO THIS PRIVACY NOTICE

**12.1** This privacy notice is not contractual; we reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact the Data Protection Officer.