

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

Who we are:

Baxters Limited (trading as Baxters Chartered Accountants) collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the [General Data Protection Regulation](#) which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

The personal information we collect and use:

In the course of our day to day business, we may collect or obtain the following personal information when you provide it to us:

Personal Data:

- Contact details (e.g. name, company name, job title and work and mobile telephone numbers, emails and postal addresses).
- Family and beneficiary details for insurance and pension planning services (e.g., names and dates of birth).
- Financial information (e.g., bank details, payroll, pensions, assets, taxes, investment interests, bank details, insolvency records).
- Professional details (e.g., job and career history, educational background, professional memberships).

Sensitive Personal Data:

- Race or ethnic origin.
- Politics or trade union membership.
- Religion.
- Biometrics (where used for ID purposes).
- Health.

We typically receive the above information via direct interaction with clients, from information provided during client engagements, from suppliers and through other situations related to the nature of our business as chartered accountants.

Why we need personal data:

Typically, we need personal data in order to:

- provide professional advice and deliver reports related to our tax, advisory, audit and assurance, pension scheme administration, restructuring, mergers and acquisitions and other professional services;
- send invitations and provide access to guests attending our events or our sponsored events.

- assist with Travel arrangements;
- promote our professional services, products and capabilities to existing and prospective business clients; and
- comply with legal and regulatory obligations related to countering money laundering, terrorist financing, fraud and other forms of financial crime.

How we collect personal data:

Directly:

- Via individuals who provide us their business card, attend meetings or events we host or visit our offices.
- We may also obtain personal data directly when, for example, we are establishing a business relationship or performing professional services through a contract.

Indirectly:

- We obtain personal data indirectly about individuals from a variety of sources (predominantly 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.
- Business clients -- Our business clients may engage us to perform professional services which involve sharing personal data they control as part of that engagement. For example, we will review payroll data as part of an audit and we often need to use personal data to provide pension services.
- Public sources -- Personal data may be obtained from public registers (such as Companies House), news articles, sanctions lists, and Internet searches.

Reasons we can legally collect and use your personal information

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a point of contact when corresponding with the legal entity you work for/at/with (or if you are a sole trader)	Personal Data	Performance of a contract with the client

<p>To process and deliver the client's order for services including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>Personal Data</p>	<p>(a) Performance of a contract with the client</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you and the client which will include:</p> <p>(a) Notifying you and the client about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>Personal Data</p>	<p>(a) Performance of a contract with the client</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To administer and protect our business (including data analysis, support, reporting and hosting of data)</p>	<p>Personal Data</p>	<p>(a) Necessary for our legitimate interests (for running our business, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant advertisements to you and/or the client and measure or understand the effectiveness of the advertising we serve to you and/or the client</p>	<p>Personal Data</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>Handling of expense receipts submitted for individual tax or accounting advice.</p>	<p>Sensitive Data (e.g. receipts reveal affiliations with trade unions).</p>	<p>Performance of a contract with the client</p>
<p>Handling of personal identification documents submitted by clients.</p>	<p>Sensitive data (e.g. documents reveal race or ethnic origin and/or biometric data of</p>	<p>Performance of a contract with the client</p>

	private individuals.	
Registration forms sent to guests prior to arrival at our hospitality events.	Sensitive data (e.g. dietary or access restrictions disclosed by attendees which reveal religious beliefs, allergies and physical health details).	Necessary for our legitimate interests (to ensure our hospitality events are safe, accessible and all-inclusive).

Who we share your personal information with:

We may share personal data with trusted third parties to help us deliver our services. Third parties who we may share personal data with include:

- 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, auditors and insurers.
- A potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger/acquisition of part or all of our business or assets, or any associated rights or interests.
- Payment services providers.
- Marketing services providers.

We will share personal information with law enforcement or other authorities if required by applicable law.

We will not share your personal information with any other third party and we do not store or transfer personal data outside of the European Economic Area (EEA).

How long your personal data will be kept:

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.

Your rights:

Under the [General Data Protection Regulation](#) you have a number of important rights which you are allowed to exercise free of charge. In summary you have the right to:

- the fair processing of information and transparency over how we use your use personal information;
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;

- require us to correct any mistakes in your information which we hold;
- require the erasure of personal information concerning you in certain situations;
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- object at any time to processing of personal information concerning you for direct marketing;
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object in certain other situations to our continued processing of your personal information;
- otherwise restrict our processing of your personal information in certain circumstances; and
- claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to us;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates to.

If you would like to unsubscribe from any email newsletter, you can also click on the 'unsubscribe' button at the bottom of the email newsletter. It may take up to 7 days for this to take place.

Keeping your personal information secure:

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it.

Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

How to complain:

We hope that we can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Changes to this privacy notice:

This privacy notice was published in July 2018.

We may change this privacy notice from time to time. You should check this policy occasionally to ensure you are aware of the most recent version.

How to contact us:

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please send an email to andrew@baxters-ca.co.uk, or write to 3 Nightingale Place, Pendeford Business Park, Wobaston Road, Wolverhampton, WV9 5HF or call 01902 787171.