

**PEACHEY & CO LLP**  
**Privacy policy**

**1. IMPORTANT INFORMATION AND WHO WE ARE**

**2. Purpose of this privacy policy**

3. This privacy policy aims to give you information on how Peachey & CO LLP collects and processes your personal data and how we comply with European Union data protection requirements.

4. It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. By consenting to this privacy policy you are giving us permission to process your personal data specifically for the purposes identified.

**5. Controller**

6. Peachey & Co LLP is the controller and responsible for your personal data (collectively referred to as “PCo”, “we”, “us” or “our” in this privacy policy).

7. We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, please contact the data privacy manager using the details set out below.

**8. Data Privacy Manager**

9. Name: Nicholas Alun-Jones

10. Email address: naj@peachey.co.uk

11. Postal address: 95 Aldwych, London WC2B 4JF

**12. Changes to the privacy policy and your duty to inform us of changes**

13. This version was last updated on 23 May 2018.

14. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

**15. THE DATA WE COLLECT ABOUT YOU**

16. 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).

17. We may collect, use, store and transfer different kinds of personal data about you including:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account details.

We do not collect any Special Categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

We do not collect any information about criminal convictions and offences or personal data relating to children.

**18. If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are preparing to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service but we will notify you if this is the case at the time.

**19. HOW IS YOUR PERSONAL DATA COLLECTED?**

20. We use different methods to collect data from and about you including through:

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- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources including Identity Data and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

#### 21. HOW WE USE YOUR PERSONAL DATA

22. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.

23. Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time.

#### 24. Purposes for which we will use your personal data

25. We have set out in the table below, a description of all 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.

26. 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 personal data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver services to you including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include notifying you about changes to our terms of engagement or privacy policy	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated)
To administer and protect our business	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud) (b) Necessary to comply with a legal obligation

#### 27. Marketing

28. We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

29. We may use your Identity and Contact to form a view on what we think you may want or need, or what may be of interest to you.

30. You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

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**31. Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside PCo for marketing purposes.

**Opting out**

You can ask us to stop sending you marketing messages at any time by contacting our Data Privacy Manager following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service or other transactions.

**Change of purpose**

We will only use your personal data 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 data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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

**33. DISCLOSURES OF YOUR PERSONAL DATA**

34. We may have to share your personal data with the parties set out below for the purposes set out above.

- Professional advisers, HM Revenue & Customs, regulators and other authorities.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

In the event that you do not wish to have your personal data disclosed to the third parties listed above you should contact us. You may also change your personal preferences to indicate the format, frequency and subject matter of communications you wish to receive from third parties as a result of this disclosure. Please note that this may prevent us from performing the services contracted with you and we will notify you if this is the case.

**International transfers**

We have commercial relationships with third parties based outside the European Economic Area (**EEA**) which may from time to time entail their processing of your personal data, which may involve a transfer of personal data outside the EEA

35. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

36. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA (if any).

37. We may share your personal data (when interacting with the authority) with the following third parties based outside of the EEA:

- Service providers acting as processors who provide IT and system administration services.
- Professional advisers including lawyers, bankers, accountants, auditors and insurers.

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- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers.

#### Data security

We have put in place appropriate security measures 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 will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

#### Data retention

##### How long will you use my personal data for?

We will only retain your personal data 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.

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.

By law we have to keep basic information about our customers (including Contact, Identity and Financial Data) for up to 7 years after they cease being customers for tax purposes.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

#### 38. YOUR LEGAL RIGHTS

38.1 Under data protection laws, in certain circumstances, you have the right to:

38.2 **Request access** to your personal data (known as a “data subject access request”) enabling you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

38.3 **Request correction** of any incomplete or inaccurate personal data that we hold about you. We may need to verify the accuracy of the new data you provide to us.

38.4 **Request erasure** of your personal data. You may ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

38.5 **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

38.6 **Request restriction of processing** of your personal data. You may ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

38.7 **Request the transfer** of your personal data to you or to a third party. We will provide your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information

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which you initially provided consent for us to use or where we used the information to perform a contract with you.

38.8 **Withdraw consent at any time** where we are relying on consent to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case.

38.9 If you wish to exercise any of the rights set out above, please contact our Data Privacy Manager.

38.10 If you are unhappy with the way in which your personal data has been processed 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 ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance using the contact details above so that your concerns may be dealt with via our internal complaints procedure.

### 38.11 No fee usually required

38.12 You will not have to pay a fee to access your personal data (or to exercise any of your legal rights). We may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### 38.13 What we may need from you

38.14 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### 38.15 Time limit to respond

38.16 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

38.17