

## Glenton Smith Limited Privacy Policy

This is the privacy policy of Glenton Smith Limited, a member of the Institute of Chartered Accountants of Scotland.

This privacy policy explains how Glenton Smith Limited collects and uses any personal information we collect about you.

Topics:

- What information do we collect about you?
- Where we collect personal information from?
- How will we use the information about you?
- Who we share your personal information with
- How long we retain your personal information for
- Holding personal information outside the EEA
- Data Security
- Using our website and cookies
- Marketing
- Access to your information and correction including how to contact us
- Changes to our privacy policy

### What information do we collect about you?

We collect personal information about you when you register with us or engage us to provide services. This may include some or all of the following according to your relationship with us:

- Name
- Date of birth
- Gender
- Address
- Email address
- Telephone number
- National Insurance and Unique Tax Reference Numbers
- Personal financial details
- ID verification information as required for Anti Money Laundering Checks

### Where we collect personal information from?

The information we collect comes directly from you and from publicly available sources such as Companies House where applicable.

### How will we use the information about you?

We collect information about you in order:

- to deliver services for which you engage us and to enable you to meet your legal responsibilities,
- to verify your identity as required for anti-money laundering checks
- to communicate by post, email or telephone
- to understand needs and how they may be met
- to maintain records
- to process financial transactions

If you agree, we will also email or mail you about other products and services we think may be of interest.

## Who we share your personal information with

Glenton Smith Limited will not share your information for marketing purposes with other companies.

In order to deliver services, we may be asked to provide information to a third party such as HMRC, a letting agent or mortgage provider on your behalf. Where you have requested that we undertake the service you are also deemed to have given permission for us to share information with the third parties concerned.

## How long we retain your personal information for

We shall not retain any personal data for any longer than is necessary in light of the purpose(s) for which that data is collected, held, and processed. Different types of personal data, used for different purposes, will necessarily be retained for different periods (and its retention periodically reviewed). Full details of our data retention periods are set out in our Data Retention Policy.

## Holding personal information outside the EEA

GDPR applies only to countries within the EEA (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). We may store the records and information that we retain for you on web based or cloud storage software programmes which are based in countries that are not part of the EEA.

We will only transfer personal data to a country outside of the EEA if one or more of the following applies:

- The transfer is to a country, territory, or one or more specific sectors in that country (or an international organisation), that the European Commission has determined ensures an adequate level of protection for personal data;
- The transfer is to a country (or international organisation) which provides appropriate safeguards in the form of a legally binding agreement between public authorities or bodies; binding corporate rules; standard data protection clauses adopted by the European Commission; compliance with an approved code of conduct approved by a supervisory authority (e.g. the Information Commissioner's Office); certification under an approved certification mechanism (as provided for in the GDPR); contractual clauses agreed and authorised by the competent supervisory authority; or provisions inserted into administrative arrangements between public authorities or bodies authorised by the competent supervisory authority.

## Data Security

We have put in place commercially reasonable and 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, 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 data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## Using our website and cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor

use of the website and to compile statistical reports on website activity. Currently Glenton Smith does not use cookies. Should we decide to use cookies in the future a pop-up box will seek your consent when you access the website.

## Marketing

If you consent to receive it, we would like to send you general tax updates and newsletters which we think may be of interest to you.

If you no longer wish to receive this communication, please notify us by contacting the office using the details set out below.

## Access to your information and correction

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, contact us at the following address:

Glenton Smith Ltd  
Croft House  
Brightwell cum Sotwell  
Oxfordshire  
OX10 0RJ

01491836546

[enquiries@glentonsmith.co.uk](mailto:enquiries@glentonsmith.co.uk)

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

## Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 25 May 2018.