

At Beever and Struthers we are committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Personal data is information that can be used to identify a living individual, as defined by current UK data protection legislation, and includes name, address, phone number and email address. It may also include information about your health and other "sensitive personal data".

The definition of processing data under data protection legislation is wide and can include obtaining, recording, using and holding personal data. Erasure and destruction of data is also covered.

In relation to any contract to provide you with professional services please also refer to our general terms and conditions of business, forming part of our terms of engagement, for further information in relation to data protection and confidentiality. These terms can be found here:

www.beeverstruthers.co.uk/userfiles/General-Terms-of-Business---Jan-22-Web.pdf

1. ABOUT US AND THE PURPOSE OF THIS NOTICE

Beever and Struthers are chartered accountants and business advisors. We are registered as a partnership and our registered office is at St Georges House, 215 – 219 Chester Road, Manchester, M15 4JE.

For the purpose of the Data Protection Legislation and this notice, we are the 'data controller'. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

Please note that for certain engagements, we may act as either data processors or data controllers or both for our clients, and this is defined in our terms of engagement with you.

We have appointed a Data Protection Officer. Our Head of Privacy is our Data Protection Point of Contact and is responsible for assisting with enquiries in relation to this privacy notice or our treatment of your personal data. Should you wish to contact our Data Protection Point of Contact you can do so using the contact details noted at paragraph 8, below.

In relation to employment matters please refer to our separate privacy statements, available within the "careers" section of our website for job applicants and published internally as part of our policies and procedures for current members of staff.

2. THE KIND OF INFORMATION WE HOLD ABOUT YOU

The information we hold about you may include the following:

- your personal details (such as your name and/or address, company name, telephone number, e-mail address, bank details, tax reference numbers, salary details or other relevant personal information depending on the relevant circumstances).
- details of contact we have had with you in relation to the provision, or the proposed provision, of our services.
- details of any services you have received from us.
- our correspondence and communications with you.
- information about any complaints and enquiries you make to us.
- information from research, surveys, and marketing activities

3. HOW WE MAY COLLECT YOUR PERSONAL DATA

Collection of personal data

We obtain your personal data directly from you when:

- you request a proposal from us in respect of the services we provide.
- you engage us to provide our services and also during the provision of those services.
- you contact us by email, telephone, post [or social media] (for example when you have a query about our services;
- You fill in forms on our website (www.beeverstruthers.co.uk), subscribe to our services, search for a service, participate in other social media functions on our website or enter a competition, promotion or survey and when you report a problem with our site; and

You might also give us personal data when you participate in meetings, seminars or other events we arrange.

Messages that you send to us by email may not be secure. It is recommended that you do not send any confidential information by email. If you choose to send any confidential information to us via email you do so at your own risk with the knowledge that a third party may intercept this information. Instructions sent by you via email and to the website are processed exclusively at your risk.

If you apply to work for us, we may need to collect other personal data from you, and further details can be found in our separate privacy statements on employment matters, as referred to above.

Information we collect about you:

i. Telephone

When you telephone us, we may record the phone number you use to call us.

ii. Visitor information

Our web servers collect certain information about all visitors to this site, including:

- IP addresses.
- Host names.
- Domain name.
- The time and date information is requested.
- The browser version and platform when information is requested.
- A record of which pages have been requested.

We use this information to produce aggregate visitor statistics in relation to which pages are being accessed.

We may also use it to monitor usage patterns on this website to improve navigation and design features to help you get information more easily. These statistics include the cumulative data sent and received by the visitor and do not include information that can be used to identify any individual.

Information we receive or obtain from other sources

If you use, or intend to use, the professional services that we provide, we may obtain information from additional sources for the purposes of fulfilling our obligation to provide those professional services to you.

For example, we may consult publicly available sources of information, such as the Companies House Register, which hold personal data about you in order to complete customer due diligence checks to comply with anti-money laundering legislation. We may also need to consult other external sources such as credit reference agencies (e.g. state information obtained from credit reference agencies). We will obtain your consent prior to undertaking such checks.

3. HOW WE MAY COLLECT YOUR PERSONAL DATA (CONT'D)

Cookies

Cookies are used on this site to save your preference for viewing pages as 'text only' or with images. No personal information is stored.

Most web browsers automatically accept cookies, but if you prefer, you can change your browser to prevent that. You are not obliged to accept cookies and you can adjust your browser's setting to prevent it from accepting cookies on your computer. However, you may not be able to take full advantage of our site or use certain functions if you disable cookies.

If you continue to use our site, you agree to our use of cookies.

4. HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU

When you submit information to us, you understand and agree that we may store your information in a secure and confidential manner.

We may process your personal data for purposes necessary for the performance of our contract with you and to comply with our legal obligations. This may include processing your personal data where you are an employee, subcontractor, supplier or customer of our client.

We may also process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

Situations in which we will use your personal data

We may use the personal information that we collect for a number of reasons:

- in order to fulfil our obligation to provide you with professional services arising from any contracts entered into between you and us (or propose to enter into); or
- carry out our obligations arising from any agreements entered into between our clients and us (which will most usually be for the provision of our services) where you may be a subcontractor, supplier or customer of our client;
- to record your feedback and respond to your requests for information; or
- to notify you about changes to our service; or
- for our legitimate business interests, for example to provide you with information about other services we offer that are similar to those that you have already purchased or enquired about; or
- if you have authorised it, by completing the relevant consent forms, we also use the information that you provide for marketing purposes, as part of our effort to keep you informed about our products and services.

When we send you direct marketing by post, or conduct marketing over the phone with you, we consider this to be in our legitimate business interest to do so. You can object to this processing of your personal data at any time. We appreciate the importance of responsible use of this information. If you do not want the information you provide to us to be used to inform you of other services and special offers from Beever and Struthers, and you indicate this preference when you provide the information to us, we will honour your preference.

Please be aware that by registering for updates or to attend a seminar etc., you agree to your details being used within Beever and Struthers for the purposes of providing information to you. We would only give these details to a third party – such as a mailing house – if it was necessary to provide you with the information you requested. If at any time you no longer wish to receive updates and invitations from us, please just let us know by sending an email to enquiries@beeverstruthers.co.uk to unregister.

4. HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU (CONT'D)

Please see our separate privacy policies in relation to employment matters, referred to in 1. above, for information on how we use, retain and share information that is provided in relation to job applications.

In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

Data retention

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration the requirements of our business and the services provided, any statutory or legal obligations and the purposes for which we originally collected the personal data.

Further details are included within our terms of engagement. Please contact us if you have any specific queries in relation to this.

Change of purpose

Where we need to use your personal data for a reason, other than the purpose for which we originally collected it, we will only use your personal data where that reason is compatible with the original purpose. If we need to use your data for a new purpose we will notify you and communicate our legal basis for this new processing.

5. DATA SHARING

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so. This may include sharing your personal data with a regulator or to otherwise comply with the law.

“Third parties” includes third-party service providers and the members of our firm’s network] We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with the law.

We will share your information internally for the purposes of fulfilling our obligation to provide professional services to you. All data held within Beever and Struthers is subject to our firm-wide data confidentiality and IT security policies (see Section 7 – Data Security for further information).

6. TRANSFERRING PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

Where indicated in your engagement documents, limited personal data that we collect is transferred to and processed in a destination outside of the EU. In these circumstances, your personal data will only be transferred when one of the following safeguards is in place:

- The country that we send the data is approved as providing an adequate level of protection for personal information; or
- The recipient has agreed with us standard contractual clauses (SCC's), obliging the recipient to safeguard the personal information.

6. TRANSFERRING PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA) (CONT'D)

Limited situations where your personal data may be transferred outside the EEA are as follows:

- 3rd Party: HLB Mann Judd.
- Purpose of Processing: Accounting and Audit Services.
- Nature of Data: Identity Data, Contact Data, Transaction Data, Employment Data, Financial Data.
- Location of Data: Fiji.
- Appropriate Safeguard: Standard Contractual Clauses.

To find out more about how your personal data is protected when it is transferred outside the EEA, please contact our Data Protection Officer.

7. 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, 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 data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

8. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to 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 exercised your right to object to processing (see below).
- Object to processing of your personal data 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 basis. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

8. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION (CONT'D)

If you want to exercise any of the above rights, please confirm in writing to us either by letter, fax or email as follows:

Data Protection Officer
Beever and Struthers
215-219 Chester Road
Manchester
M15 4JE

Tel: 00 44 161 832 4901
Email: enquiries@beeverstruthers.co.uk

Please include your name, company name, address, and/or email address when you contact us.

Beever and Struthers are not responsible for the content or privacy practices of any other website to which this website may link.

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

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.

Access requests connected with recruitment and employment activity should be directed to Human Resources using the contact details above or p2@beeverstruthers.co.uk

9. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email our data protection point of contact Helen Armstrong at harmstrong@beeverstruthers.co.uk

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

10. CHANGES TO THIS NOTICE

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

This privacy notice was last updated on 13 April 2022.

11. FURTHER INFORMATION

This privacy policy can only be a summary of how we collect any personal data we collect from you, or that you provide to us, and how it will be processed by us. If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please email our Data Protection Point of Contact Helen Armstrong (Head of Privacy) at harmstrong@beeverstruthers.co.uk

Beever and Struthers are not responsible for the content or privacy practices of any other website to which this website may link. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

You can find more information about your rights under the Act on the ICO website: <https://ico.org.uk/>

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone - 0303 123 1113 (local rate) or 01625 545 745

Website - <https://ico.org.uk/concerns>