

#### **Langdowns DFK Privacy Statement**

Your information will be held by Langdowns DFK. More information on our firm can be found at http://www.langdownsdfk.com

# How we use your information

This privacy notice is to let you know how we promise to look after your personal information. This includes what you tell us about yourself, what we learn by having you as a client, and the choices you give us about what marketing information you may want us to send you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

## **Our Privacy Promise**

We promise:

- To keep your data safe and private.
- Not to sell your data.
- To give you ways to manage and review your marketing choices at anytime.

# Data Protection law will change on 25 May 2018 as the General Data Protection Regulations come into effect.

This notice sets out most of your rights under the new law. We'll update it again between now and 25 May 2018 when changes come into effect.

## How the law protects you

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works.

Data Protection regulations say that we can use personal information only if we have a proper reason to do so. This includes sharing it outside Langdowns DFK. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.



What we use your personal information for	Our reasons	Our legitimate interests
<ul> <li>To manage our relationship with you or your business.</li> <li>To develop new ways to meet our customers' needs and to grow our business.</li> <li>To develop and carry out marketing activities.</li> <li>To study how our clients use products and services from us and other organisations.</li> <li>To provide advice or guidance about our products and services.</li> <li>Producing and Accounts for your business.</li> <li>Producing a Tax Return for you, and your business.</li> <li>Running a Payroll service.</li> <li>Giving your Business Advice</li> <li>Undertaking Bookkeeping for you.</li> </ul>	<ul> <li>Your consent.</li> <li>Fulfilling contracts.</li> <li>Our legitimate interests.</li> <li>Our legal duty.</li> </ul>	<ul> <li>Keeping our records up to date, working out which of our products and services may interest you and telling you about them.</li> <li>Developing products and services.</li> <li>Defining types of clients for new products or services.</li> <li>Seeking your consent when we need it to contact you.</li> <li>Being efficient about how we fulfil our legal duties.</li> </ul>

# **Training**

All staff have undergone GDPR training by a recognised training company and will continue to attend courses to ensure they are aware of relevant information, legislation and controls.

### **GDPR** review

We have engaged a third party organisation to review our process and make recommendation for changes and enhancements to our data management. Where appropriate changes have and will be made to provide appropriate data management.

We shall continually review our procedures for IT and data management to keep up to date with changing technology and systems.

## Where we collect personal information from

We may collect personal information about you (or your business) from these sources:

- Data you give to us
- When you apply for our products and services
- When you talk to us on the phone
- When you use our websites, mobile device apps,
- In emails and letters
- In client surveys
- Data we collect when you use our services.



- Data from third parties we work with
- Companies that introduce you to us
- Social networks
- Fraud prevention agencies
- Government and law enforcement agencies.

# Who we share your personal information with

We may share your personal information these organisations:

- HM Revenue & Customs, regulators and other authorities
- Any party linked with you or your business's product or service
- Companies we have a joint venture or agreement to co-operate with (including Langdowns Limited and Southern Business Advisors LLP who are subsidiaries or sister businesses.)
- Organisations that introduce you to us
- Companies that we introduce you to
- Market researchers
- Companies you ask us to share your data with.

#### The information we use

These are some of the kinds of personal information that we use:

- Name
- Business address
- Contact details, such as email addresses and phone numbers
- Financial data
- Data that identifies computers or other devices you use to connect to the internet. This includes your Internet Protocol (IP) address.

# Sending data outside of the United Kingdom

We will only send your data outside of the United Kingdom (UK) to:

- Follow your instructions.
- Comply with a legal duty.
- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the UK. You can find out more about data protection on the European Commission Justice website.

#### Marketing

We may use your personal information to tell you about relevant products and offers. This is what we mean when we talk about 'marketing'.

The personal information we have for you is made up of what you tell us, and data we collect when you use our services, or from third parties we work with. We study this to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.



We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

You can ask us to stop sending you marketing messages by contacting us at any time. Whatever you choose, you'll still receive statements, and other important information such as changes to your existing products and services.

We may ask you to confirm or update your choices, if you take out any new products or services with us in future. We will also ask you to do this if there are changes in the law, regulation, or the structure of our business.

If you change your mind you can update your choices at any time by contacting us.

## How long we keep your personal information

We will keep your personal information for as long as you are a client of Langdowns DFK. After you stop being a customer, we have to keep relevant records for statutory minimum periods for one of these reasons:

- To respond to any questions or complaints.
- To maintain records according to rules that apply to us.
- We may keep your data for longer if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

# The Principles of good Data Protection

These are the principles under which we seek to operate and manage your data.

- Processed lawfully, fairly and in a transparent manner in relation to individuals;
- Collected for specified, explicit and legitimate purposes and not further processed in a
  manner that is incompatible with those purposes; further processing for archiving purposes
  in the public interest, scientific or historical research purposes or statistical purposes shall
  not be considered to be incompatible with the initial purposes;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to
  ensure that personal data that are inaccurate, having regard to the purposes for which they
  are processed, are erased or rectified without delay;
- Kept in a form which permits identification of data subjects for no longer than is necessary
  for the purposes for which the personal data are processed; personal data may be stored for
  longer periods insofar as the personal data will be processed solely for archiving purposes in
  the public interest, scientific or historical research purposes or statistical purposes subject to
  implementation of the appropriate technical and organisational measures required by the
  GDPR in order to safeguard the rights and freedoms of individuals; and
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.



### How to get a copy of your personal information [Referred to as Subject Access Rights]

You can access details of the personal information we hold by writing to us at this address:

Langdowns DFK Fleming Court Leigh Road Eastleigh Southampton SO50 9PD

## Letting us know if your personal information is incorrect

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this. If you do, we will take reasonable steps to check its accuracy and correct it.

### What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

# You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It is not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we
  are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us.

# How to withdraw your consent for non-statutory personal information

You can withdraw your consent at any time. Please contact us if you want to do so. If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.



# How to complain

Please let us know if you are unhappy with how we have used your personal information. You can contact us in writing at this address:

Langdowns DFK Fleming Court Leigh Road Eastleigh Southampton SO50 9PD

You also have the right to complain to the Information Commissioner's Office if we do not respond to your complaint appropriately and in a timely manner. Find out on their website how to report a concern.

Internal data management is overseen by Ross Garfitt.