

Privacy Policy

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1. Introduction

We appreciate the trust you place in us when sharing your personal data. The General Data Protection Regulation (GDPR) seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. The security of that data is very important to us. In this document, we will explain how we collect, use and protect your personal data.

We will also explain what rights you have with regards to your personal data and how you can exercise those rights.

2. Who we are

Nicholas Peters and Co Limited is the data controller. This means that Nicholas Peters and Co Limited determines what data is collected within the organisation and how this data is going to be used and how this data is protected.

Our registered office address is:

Nicholas Peters and Co Limited

1st Floor (North)
Devonshire House
1 Devonshire Street
London
W1W 5DS

If you have questions about how we process personal data, or would like to exercise your data subject rights, please email us at DPO@nicholas-peters.co.uk

3. Companies within scope

The following companies and websites are within scope for this privacy policy:

Keytime	http://keytime.co.uk/
MoneySoft	https://moneysoft.co.uk/
Virtual Cabinet	https://www.virtualcabinet.com/
Relate Software	http://www.relate-software.com/
My Firms App	www.myfirmsapp.co.uk/
Practice Web	https://www.practice-web.com/services/support

Unless specifically stated, we consider these websites to be UK based websites; see section 6 below for more information on non-EU data processing.

It includes personal data that is collected through our website, by telephone, email, app and through any other related applications.

4. Collection of personal data

We collect personal data from you for one or more of the following purposes:

- 1. To provide you with a variety of accounting services you have requested or which we think may be relevant to a subject in which you have demonstrated an interest;
- 2. To initiate and complete accounting services for you, or the entity that you represent, for the purchase of services and/or products;
- 3. To fulfil a contract that we have entered into with you or with the entity that you represent;
- 4. To ensure the security and safe operation of our website and underlying business infrastructure, and
- 5. To manage any communication between you and us.

The table in Section 5 below provides more detail about the data that we collect for each of these purposes, the lawful basis for doing so, and the period for which we will retain each type of data.

5. Lawful basis for the processing of personal data

The table below describes the various forms of personal data we collect and the lawful basis for processing this data. Our business architecture, accounting and systems infrastructure and compliance organisation means that all personal data is processed on common, Group-wide platforms. We have processes in place to make sure that only those people in our organisation who need to access your data can do so. A number of data elements are collected for multiple purposes, as the table below shows. Some data may be shared with third parties and, where this happens, this is also identified below.

When we process on the lawful basis of legitimate interest, we apply the following test to determine whether it is appropriate:

The purpose test – is there a legitimate interest behind the processing?

Necessity test – is the processing necessary for that purpose?

Balancing test – is the legitimate interest overridden, or not, by the individual's interests, rights or freedoms?

Purpose of collection	Information category	Data collected	Purpose for collection	Lawful basis for processing	Data shared with?	Retention period
1. To provide you with information	Subject matter information	Name, company name, Tax reference details, email address, telephone number.	To provide appropriate email information about accounting services that you have requested	Contractual fulfilment	Internally only	Maximum 7 years from the date the information is collected.
			To provide further, related accounting information and ongoing updates in relation to the accounting area	Legitimate interest	Internally only	
		Personal contact information	General communication	Consent	Internally only	
2. Transactional information	Transaction details	Name, physical address, email address, telephone number, bank statements, previous accounting records – tax returns, accounts, VAT calculations and other medium of content delivery	To process purchase transactions for accounting services with clients, and to ensure any transaction issues can be dealt with.	Contractual performance	Internally only	Maximum 7 years from the date of the performance of the contract.
			For accounting and taxation purposes	Statutory obligation	Internally only	6 months from the date the data subject has input personal information but has not proceeded with a transaction.
			Documentation should any contractual legal claim arise	Legitimate Interest	Internally only	7 years for accounting records from the performance

						of the contract
3. Communications	Contact information	Names, contact details, identification details	To communicate with you about any issue that you raise with us or which follows from an interaction between us.	Legitimate interest	Internally only.	Relevant statutes of limitation.

6. Storage of personal data

- The majority of our websites and web applications are hosted in the EU and are accessed only by our EU-based staff.
- We use Cloud Service Providers (CSPs) as part of our processing environment. Unless we specifically state otherwise, we are, in respect of all these CSPs, the data controller.
- Unless we specifically state otherwise all of the CSPs that we use utilise EU-located processing facilities.
- We operate a data retention policy in respect of all data, whether paper-based or digital and those aspects of it which relate to personal data are contained in the table at 5, above.

7. Security measures

We have what we believe are appropriate security controls in place to protect personal data. Risk assessment, including assessing risks to the rights and freedoms of data subjects, is at the heart of our ISMS. We do not, however, have any control over what happens between your device and the boundary of our information infrastructure. You should be aware of the many information security risks that exist and take appropriate steps to safeguard your own information. We accept no liability in respect of breaches that occur beyond our sphere of control.

8. Your rights as a data subject

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email DPO@nicholas-peters.co.uk Or, use the information supplied in the contact us section below. In order to process your request, we will ask you to provide two valid forms of identification for verification purposes. Your rights are as follows:

- **The right to be informed**
 As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communications we may send you.
- **The right of access**
 You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed
- d) The retention period or envisioned retention period for that personal data
- e) When personal data has been collected from a third party, the source of the personal data

- If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.

- The right to rectification
When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

- The right to erasure (the 'right to be forgotten')
Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

- The right to restrict processing
You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:
 - a) The accuracy of the personal data is contested
 - b) Processing of the personal data is unlawful
 - c) We no longer need the personal data for processing but the personal data is required for part of a legal process
 - d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing

- The right to data portability
You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

- The right to object
You have the right to object to our processing of your data where
 - Processing is based on legitimate interest;
 - Processing is for the purpose of direct marketing;
 - Processing is for the purposes of scientific or historic research;
 - Processing involves automated decision-making and profiling.

9. Contact us

Any comments, questions or suggestions about this privacy policy or our handling of your personal data should be emailed to DPO@nicholas-peters.co.uk

Nicholas Peters and Co Limited

Attention of the Data Protection Officer

1st Floor (North)
Devonshire House
1 Devonshire Street
London
W1W 5DS

Telephone: +44 (0)203 3667 5200

Our telephones are open 9:00 am – 5:30 pm GMT, Monday to Friday. Our front desk team will take a message and ensure the appropriate person responds as soon as possible.

10. Complaints

Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to a supervisory authority within the European Union. For the United Kingdom, this is the Information Commissioner's Office (ICO), who is also our lead supervisory authority. Its contact information can be found at <https://ico.org.uk/global/contact-us/>.