



# PRIVACY POLICY

## 1. PURPOSE OF THIS NOTICE

The notice describes how we collect and use personal data about you, in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act 2018 and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK ('Data Protection Legislation').

Please read the following notice carefully to understand our practises regarding your personal data and how we will treat it.

## 2. TERMS

Personal data relates to any information about a natural person that makes you identifiable which may include (but is not limited to); names and contact information ie emails and telephone numbers; National Insurance numbers; employment history; employee numbers; credit history; personal tax; payroll and accounting data.

### What is a Data Controller?

The '*data controller*' is the person or organisation who decides the purposes for which and the way in which any personal data is processed. For the purpose of the Data Protection Legislation and this notice, the data controller is **Inform Accounting**. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

### What is a Data Processor?

A "*data processor*" is a person or organisation which processes personal data for the controller.

### What is Data Processing?

Data processing is any operation or set of operations performed upon personal data, or sets of it, be it by automated systems or not. Examples of data processing explicitly listed in the text of the GDPR are: collection, recording, organising, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing by transmission, disseminating or making available, aligning or combining, restricting, erasure or destruction.

## 3. HOW AND WHAT INFORMATION WE MAY COLLECT ABOUT YOU

We obtain personal data about you, for example, 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 other method of communication;
- from third parties and publicly available resources (for example, from Companies House).

You agree that we are entitled to obtain, use and process the information you provide to us to enable us to discharge the Services (as defined in our Letter of Engagement and supporting Schedules) and for other related purposes including:



Information Category	What does this include? (may include but not limited to)	How is this collected / sourced?	Legal basis for processing
Usage data	IP address, location, browser type and version, operating system, length of visit, page views, frequency and pattern of website use.	Hubspot, Inc. - please see cookie policy section later in this document	<b>Legitimate interests</b> - monitoring and improving our website and services
Account and contact data	Name and email address, feedback and survey responses, your interests and preferences, billing address, delivery address and telephone numbers	You or your employer, collected via various means	<b>Legitimate interests</b> - improving our services, and monitoring users
Service data	any data in relation to the services you have contracted us to provide e.g. HMRC reference numbers	You or your employer, collected via various means	<b>Contract</b>
Enquiry data	Any data you provide relating to the services you are interested in, and your business or personal circumstances	You	<b>Consent</b>
Transaction data	Contact details, card (account) details, details about payments to and from you and other details of products and services you have purchased from us	You	<b>Contract and legitimate interests</b> (namely the proper administration of our business)
Correspondence data	Your email preferences including receiving marketing information from us, your communication preferences	You	<b>Consent and legitimate interests</b> (educational content)

We may process your data for:

- Updating and enhancing client records
- Analysis for management purposes
- Carrying out credit checks in relation to you
- Statutory returns
- Legal and regulatory compliance
- Crime prevention
- Notifying you about any changes to our services

#### 4. HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU

We may process your personal data to comply with our legal obligations, and most commonly to enable us to perform the Services you have contracted for us to provide.

We may 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.

We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal



data then you have the right to withdraw your consent to processing for such specific 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.

We may receive personal data from you for the purposes of our money laundering checks, such as a copy of your passport. This data will only be processed for the purposes of preventing money laundering and terrorist financing, or as otherwise permitted by law or with your express consent.

If you refuse or fail to provide us with certain information when requested, we may not be able to perform the contract we have entered into with you. Alternatively, we may be unable to comply with our legal or regulatory obligations, and may seek to terminate the engagement.

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.

### **Profiling**

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of extra information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and cut fraud and credit risk.

### **Communications and Marketing**

We will periodically send you free newsletters, promote educational content, and send emails that directly promote the use of our Platform, or Services. Promotion of educational content may include new products and/or service offerings of associated third parties, and webinars hosted by ourselves or in partnership with an associated third party, that we believe you may benefit from.

When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the email you receive or by contacting us directly via [hello@informaccounting.co.uk](mailto:hello@informaccounting.co.uk).

Despite your indicated email preferences, we may send you Service related communications, including notices of any updates to our Terms of Use or Privacy Policy in line with this notice.

## **5. COOKIES**

A cookie is an identifier file containing a string of letters and numbers that is sent from a web server to a web browser. The file is stored on the browser, and returned to the server each time access to a page on the server is requested i.e. each time you revisit a website. Although cookies do not typically store personally identifiable information, personal information held by us may be linked to cookies stored on your browser.

Our website is hosted by Hubspot and a list of cookies used can be found on their website [https://knowledge.hubspot.com/articles/kcs\\_article/reports/what-cookies-does-hubspot-set-in-a-visitor-s-browser](https://knowledge.hubspot.com/articles/kcs_article/reports/what-cookies-does-hubspot-set-in-a-visitor-s-browser). Blocking cookies will mean you will not be able to use all the features on our website.

### **Cookies used by our service providers**

Our service providers use cookies which may be stored on your computer when you visit their websites(s). We are not responsible for the cookies used by these providers, however each provider will have their own cookie policy available to view on their website.



## 6. DATA SHARING

Our work for you may require us to pass your information to our third-party service providers, agents, subcontractors and other associated organisations (financial institutions, Government agencies etc) for the purposes of completing tasks and providing the Services to you on our behalf.

'Third Parties' includes third-party service providers which includes accounts processing software and email providers. Please see **Appendix A** for a list of third party software providers used internally by **Inform Accounting**.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

We will not share your information for marketing purposes with companies so that they may offer you their products and services, unless expressly permitted by you.

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.

## 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.

### **Transferring your information outside of Europe**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring safeguards are implemented.

Please note, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.



### **Security precautions in place about data collected**

When you give us personal information, we take steps to make sure that it's treated securely. Non-sensitive details (your email address etc.) are sent normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

## **8. DATA RETENTION**

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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;
- the purposes for which we originally collected the personal data;
- the lawful grounds on which we based our processing;
- the types of personal data we have collected;
- the amount and categories of your personal data; and
- whether the purpose of the processing could reasonably be fulfilled by other means.

### **Change of Purpose**

Where we need to use your personal data for another reason, other than for the purpose for which it was collected, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

## **9. 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 or legal reason for us to continue 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.

The only reasons we will be able to deny your request is if we can show compelling legitimate grounds for the processing, which override your interest, rights and freedoms, or the processing is for the establishment, exercise or defence of a legal claim.

- 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.

If you wish to exercise any of the above rights, please email [hello@informaccounting.co.uk](mailto:hello@informaccounting.co.uk).

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 if your request for access is clearly 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 to 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.

## 10. 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, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email [hello@informaccounting.co.uk](mailto:hello@informaccounting.co.uk).

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

## 11. CHANGES TO THIS NOTICE

Any changes we may make to our privacy notice in the future will be provided to you.

This privacy notice is dated 1 March 2022.



## 12. CONTACT 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 [hello@informaccounting.co.uk](mailto:hello@informaccounting.co.uk).

We are a limited company registered in England and Wales under registration number 06872641, and our registered office address is at St James House, 65 Mere Green Road, Sutton Coldfield, West Midlands, B75 5BY

Our principal place of business is at the address above.

You can contact us:

- by post, to the postal address given above;
- using our website contact form;
- by telephone, on the contact number published on our website;
- by email, using the email address published on our website.

This website is owned and operated by Inform Accounting.

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. You can do this through the ICO website: <https://ico.org.uk/concerns/>



## APPENDIX A - Third Party Service Providers and Partners of Inform Accounting

Links to the third party software providers privacy policies:

123 Sheets	<a href="https://123sheets.com/public/data-policy.pdf">https://123sheets.com/public/data-policy.pdf</a>
AdvanceTrack	<a href="https://www.advancetrack.com/privacy-policy/">https://www.advancetrack.com/privacy-policy/</a>
BrightPay:	<a href="https://www.brightpay.co.uk/pages/privacy-policy/">https://www.brightpay.co.uk/pages/privacy-policy/</a>
Creditsafe:	<a href="https://www.creditsafe.com/gb/en/product/privacy-policy.html">https://www.creditsafe.com/gb/en/product/privacy-policy.html</a>
Digita:	<a href="https://www.thomsonreuters.com/en/privacy-statement.html">https://www.thomsonreuters.com/en/privacy-statement.html</a>
DocuSign	<a href="https://www.docusign.com/company/privacy-policy">https://www.docusign.com/company/privacy-policy</a>
Fathom	<a href="https://www.fathomhq.com/privacy">https://www.fathomhq.com/privacy</a>
Float	<a href="https://floatapp.com/privacy-policy/">https://floatapp.com/privacy-policy/</a>
Fluidly	<a href="https://fluidly.com/privacy-policy/">https://fluidly.com/privacy-policy/</a>
Free Agent	<a href="https://www.freeagent.com/website/privacy/">https://www.freeagent.com/website/privacy/</a>
Futrli:	<a href="https://www.futrli.com/privacy-policy/">https://www.futrli.com/privacy-policy/</a>
GoCardless:	<a href="https://gocardless.com/security/">https://gocardless.com/security/</a>
Google:	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>
Government Digital Services:	<a href="https://www.gov.uk/help/privacy-policy">https://www.gov.uk/help/privacy-policy</a>
hronline (Peninsula Group)	<a href="https://www.brighthr.com/terms">https://www.brighthr.com/terms</a>
Hubspot:	<a href="https://legal.hubspot.com/privacy-policy">https://legal.hubspot.com/privacy-policy</a>
Inform Direct	<a href="https://www.informdirect.co.uk/privacy-policy/">https://www.informdirect.co.uk/privacy-policy/</a>
Karbon	<a href="https://karbonhq.com/privacy-policy">https://karbonhq.com/privacy-policy</a>
Kimbley IT	<a href="https://www.kimbley.com/">https://www.kimbley.com/</a>
LastPass:	<a href="https://www.logmeininc.com/legal/privacy">https://www.logmeininc.com/legal/privacy</a>
Ledgerscope:	<a href="https://www.ledgerscope.com/privacy-policy/">https://www.ledgerscope.com/privacy-policy/</a>
Loom	<a href="https://www.loom.com/privacy-policy">https://www.loom.com/privacy-policy</a>
Modulr	<a href="https://www.modulrfinance.com/privacy-policy">https://www.modulrfinance.com/privacy-policy</a>
Network Telecom	<a href="https://www.networktelecom.co.uk/news/are-you-ready-for-gdpr">https://www.networktelecom.co.uk/news/are-you-ready-for-gdpr</a>
PayrollBee	<a href="https://payrollbee.co.uk/privacy-notice/">https://payrollbee.co.uk/privacy-notice/</a>
Practice Ignition:	<a href="https://www.practiceignition.com/privacy">https://www.practiceignition.com/privacy</a>
Quickbooks	<a href="https://www.intuit.com/privacy/statement/">https://www.intuit.com/privacy/statement/</a>
Receipt-Bank:	<a href="https://www.receipt-bank.com/privacy-policy/">https://www.receipt-bank.com/privacy-policy/</a>
Satago	<a href="https://www.satago.com/legal/privacy">https://www.satago.com/legal/privacy</a>
Starling Bank	<a href="https://www.starlingbank.com/legal/privacy-notice/">https://www.starlingbank.com/legal/privacy-notice/</a>
Syft Analytics	<a href="https://www.syftanalytics.com/privacy-policy">https://www.syftanalytics.com/privacy-policy</a>
Taxcalc:	<a href="https://www.taxcalc.com/legal.php">https://www.taxcalc.com/legal.php</a>
Threadit	<a href="https://www.threadit.area120.com/privacy">https://www.threadit.area120.com/privacy</a>
Trello:	<a href="https://trello.com/privacy-updated">https://trello.com/privacy-updated</a>
True Potential:	<a href="https://www.tpllp.com/privacy/">https://www.tpllp.com/privacy/</a>
Vitality Health	<a href="https://www.vitality.co.uk/legal/">https://www.vitality.co.uk/legal/</a>





Xavier Analytics

<https://xavier-analytics.com/privacy-policy/>

Xero:

<https://www.xero.com/uk/about/terms/privacy/>

Other third-party partners such as pension providers used as part of our payroll service have not been listed above, however details can be provided on request.