
PRIVACY NOTICE

BACKGROUND:

Booth Parkes & Associates Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our data subjects and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information about us

Booth Parkes & Associates Limited.

A Limited Company registered in England under company number 02991047.

Registered address: Southolme Trinity Street, Gainsborough, Lincolnshire, DN21 2EQ.

VAT number: 651 6300 63.

Data Protection Lead: David Parkes.

Email address: david.parkes@boothparkes.co.uk.

Telephone number: 01427 611177.

Postal address: Southolme Trinity Street, Gainsborough, Lincolnshire, DN21 2EQ.

We are regulated by IFA.

We are a member of Institute of Financial Accountants.

2. What does this notice cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What are your rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always

contact us to find out more or to ask any questions using the details in Part 11.

- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

5. What personal data do we collect and how do we collect this?

We may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table.

Data collected	How we collect your data
Identity Information including name, title, date of birth.	We will take an electronic scan of your identity documents.
Contact information including address, email address, telephone number.	Scan, email, telephone or CCH secure messaging portal.
Tax related information including details of your immediate family, your wealth, National Insurance number and UTR, and of your taxable income and allowable expenditure.	Scan, email, telephone, CCH secure messaging portal and from business records that you have provided to us.
Business information including business name, registered and/or trading address, job title and bank statements.	Scan, email, telephone, CCH secure messaging portal and from business records that you have provided to us.
Business bookkeeping information including contact details of your customers and suppliers, and if relevant, details of your business software user name and password.	Scan, email, telephone, CCH secure messaging portal and from business records that you have provided to us.
Recruitment information including contact information and work history: name, email address, postal address, telephone number/s, previous employers, job titles and dates of employment.	You will provide this information when you apply for a job with Booth Parkes Limited. If you subsequently become an employee of Booth Parkes Limited, you will be required to provide further personal information via our onboarding forms. Details of the information we collect, how it's processed and for what purpose are included in our employee data protection policy, a copy of which will be provided to you along with the forms mentioned above.

6. How do we use your Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What we do	What Data we use	our Lawful Basis
Administering our business and communicating with you.	Photo ID, name, title, date of birth, address, email address, telephone number, National Insurance number and UTR.	Contractual responsibility with you to help you meet your legal obligations.

Supplying our tax services to you.	Details of your immediate family, your wealth and your taxable income and allowable expenditure.	Contractual responsibility with you to help you meet your legal obligations.
Supplying our book-keeping and/or VAT services to you.	Bank statements, contact details of your customers and suppliers, and if appropriate, your business software user name and password.	Contractual responsibility with you to help you meet your legal obligations.
Supplying you with generic information, such as a client newsletter, by email (you may opt-out at any time by using the unsubscribe link contained within the email).	email address, limited information provided by you including business type and sector.	Legitimate interests.
Managing, supporting and safeguarding our employees and contractors.	Please refer to employee data protection policy.	Contract, Legal Obligation, Legitimate Interests.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

We do not use any cookies or other tracking technologies on our website.

We do however monitor how you interact with certain emails and links we send to you (such as our client newsletters and customer satisfaction surveys) to confirm that the emails have been successfully delivered and opened.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. **How long do we keep your Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How long we keep It
Identity and contact Information including Photo ID, name, title, date of birth, address, email address, telephone number, National Insurance number and UTR.	7 years following the end of the most recent tax year.
Tax related information including details of your wealth, immediate family, National Insurance number and UTR, and of your taxable income and allowable expenditure.	7 years following the end of the most recent tax year.
Business information including business name, registered and/or trading address, job title and bank statements.	7 years following the end of the most recent tax year.
Business records, correspondence and other original documents that belong to you (electronically or otherwise).	Unless otherwise agreed with you in writing, 7 years following the end of the most recent tax year unless our contract is terminated, in which case, you will need to collect your documents within 6 months following contract termination.
Job Applicant contact information and work history: name, email address, postal address, telephone number/s, previous employers, job titles and dates of employment.	Details of unsuccessful candidates deleted/shredded within 3 months of application.
Employee data.	Please refer to employee data protection policy.

8. How and where do we store or transfer your Personal Data?

We will store the majority of your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

We will store some of your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

We may store some or all of your personal data in countries outside of the UK. These are known as “third countries”. We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We will use specific approved contracts which ensure the same levels of personal data protection that apply under the Data Protection Legislation. For further information, please refer to the [Information Commissioner’s Office](#).

Please contact us using the details below in Part 11 for further information about the particular data protection safeguards used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;
- the implementation and maintenance of appropriate technology solutions such as firewall/s, anti-virus software, and encryption.

9. Do we share your Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions:

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may sometimes contract with the following third parties to supply products and services.

Recipient	Activity carried out	Location
various online accounting software providers.	Helping you to maintain your business records.	EEA, USA, Canada.
Microsoft and other communication providers.	Communication and document storage.	UK, EEA, USA.
Various online storage systems.	Remote servers and data storage.	UK, EEA.

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying

with legal obligations, a court order, or the instructions of a government authority.

10. How can I access my Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. How do I contact you?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of David Parkes):

Email address: david.parkes@boothparkes.co.uk.

Telephone number: 01427 611177.

Postal Address: Southolme Trinity Street, Gainsborough, Lincolnshire, DN21 2EQ.

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website (boothparkes.co.uk). This Privacy Notice was last updated on 5 April 2023.