

Privacy Notice as at 27th August 2020

Introduction

Your privacy's important to us and we go to great lengths to protect it. This privacy notice tells you about the personal data we hold for you, so we can provide you with your book keeping or one of our other Tall Dog services. It explains how we may collect, use and share your details and tells you about your rights under data protection laws.

1 Who we are

I, Vicki Louise Harrison trading as The Tall Dog Small Business Support services PO BOX 131 Midhurst, West Sussex, GU29 1BY.

Our ICO registration number is ZA350006.

For the purpose of Data Protection Laws:

The Data Protection Officer (DPO) for The Tall Dog is Vicki Harrison – Owner of The Tall Dog.

We ensure that your personal data is processed fairly and lawfully and is accurate. Is kept secure and is retained for no longer than is necessary.

The main reason that we process personal data is because it is necessary in order to comply with HMRC regulations.

2 Information we collect from or about you

We'll collect and process information about you from sources including details:

- You give us
- We collect from previous third-party sources – i.e. previous accountants or suppliers

If you choose not to give personal data

Sometimes we have to collect your personal data by law to enable us to complete the services required by you. If you don't give us the data we ask for, we may have to cancel these services and will advise you if this happens.

Information you give us:

- When you apply for our services and for completion of these services
- By phone, email or letter e.g. for queries or quotations
- For surveys or completion of checklists for accounting purposes.

Information we collect from your use of our services:

- We may record inbound and outbound calls
- Website and app usage e.g. cookies and tags.
- We may record the sending, bouncing, opening and use of any links directly in emails and whether you mark an email as junk including the time and date.

Information we may get from other sources:

- HMRC
- 3rd party organisations (with prior consent) including Mortgage Companies, Book-keepers, Accountants

Information collected may include:

- Personal details such as your name (including former names), date of birth, contact details (e.g. your home address and former addresses, telephone numbers and email address), length of time you've been a UK resident, marital status and identifiers such as your passport or driving licence.
- Sensitive personal data such as information about your health or criminal convictions
- Bank account and or payment card details
- Pension, Mortgage and other personal information used for processing book keeping requirements
- Passwords for social media accounts, emails or websites
- Employment information, and personal data relating to tax codes, student loans and job title.
- Survey feedback and your responses including customer satisfaction surveys / accounting checklists
- Email and IP addresses
- In- bound and out-bound phone call recordings
- Copies of your identification and similar documents e.g. passport / driving licence
- Information about how you accessed our website and this may include information to identify your browser or device to analyse website traffic only.

3 Personal data about others

We may collect information about other people in your household to conduct your services. If you give us information about another person, it's your responsibility to make sure they:

- Have been told about who we are and how their data will be used
- Have given their permission for you to use their data (including any sensitive personal data)

4 How we use your information

So, we can provide you with your services we must have a legal reason to use your personal data and this is usually:

- To comply with legal requirements
- When it's in our legitimate interest

- For the performance of contractual requirements
- For the performance of a task carried out in the public interest, or
- With your consent

Our legitimate interest for processing personal data includes validating the data you've given us against third party sources, keeping our records updated, being efficient about how we fulfil our legal and contractual duties, identifying and detecting fraud. You have the right to object to this processing.

This table explains the reason for processing your data and which of the above lawful reasons we rely on to do so

| Why we process your personal data | Needed for the preparation of performance of a contract / service | Consent | <u>Compliance with legal obligation</u> | <u>Legitimate Interest</u> |
|--|--|----------------|--|-----------------------------------|
| To process for HMRC your book keeping / payroll / CIS or other accounting services | ✓ | | ✓ | ✓ |
| To promote your services to others | ✓ | | | ✓ |
| To help us assess the risk with providing your future services | | ✓ | | ✓ |
| To collect and recover money that is owed to us | ✓ | | | ✓ |
| To help identify, prevent, investigate and report potential fraud | | | ✓ | ✓ |
| To manage your Tall Dog Services | ✓ | | ✓ | ✓ |
| To be able to provide your personal data to 3 rd parties with consent (e.g. accountants) | | ✓ | | |
| To report data (including personal data) to government organisation e.g. HMRC, Companies House | | | ✓ | |
| To use the personal data of existing customers* for marketing similar products and services (where they haven't opted out) | | ✓ | | ✓ |
| To use the personal data of new customers** for marketing similar products and services (where they haven't opted out) | | ✓ | | ✓ |

*Existing customers means individuals who were our customers on or before 25 May 2018

**New customers means individuals who were our customers after 25 May 2018

Additional reasons for processing your data:

Call recording

- We may record in-bound and out-bound phone calls and use recordings to prevent fraud, for staff training and for quality control purposes

Your use of our website

- We use various software including tags and cookies to improve your digital journey and to identify and prevent fraud. We automatically receive the IP address of your computer, mobile device or the proxy server you use to access the internet and this may include information analyse web traffic. This may collect and store information about how you access our website.
Fraud prevention cookies may collect information about certain features of your device such as your IP address, device type which is used to prevent and detect devices associated with fraudulent or other malicious activity and allows us to authenticate your account.

Emails

- We may record the sending, delivery, opening and use of any links in emails and whether you mark as unread, email as junk including the time and date of these actions. This helps confirm the successful delivery and the use of the emails we send.

Marketing – communications

If you've given your consent, we might also use your personal data to send you communications that contain marketing of products, services or offers that we think might be of interest to you, as well as deadlines and reminders applicable to you and your business. You can opt out of these at any time by clicking the unsubscribe link in the email or by emailing us directly.

Whatever you choose, you'll still receive other important information about the services you have with us such as:

- Payment Information
- Penalties and Deadlines
- Messages about your services

Third Party Data Checks

Prior to commencement of accounting related services, we may if relevant and with your consent, contact previous service providers for data relating to previous services provided required to undertake your requested service.

Fraud Prevention Agencies

The personal data you've given us, we've collected from you or we've received from third parties will be used to confirm your identity and to identify and prevent fraud and money laundering.

The type of information that will be processed could be your:

- Name
- Address
- Date of Birth
- Contact Details

- Financial Information
- Device identifiers including IP address

We and fraud prevention agencies may also allow law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering and to confirm your identity. This is so we can protect our business and comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have asked for.

Fraud prevention agencies can hold your personal data for different periods of times and if you're considered to pose a fraud or money laundering risk, your data can be held for up to seven years.

If we or a fraud prevention agency, determine you're a fraud or money laundering risk, we may refuse to provide the services you've asked for, or to employ you, or we may stop providing any existing services.

A record of any fraud or money laundering risk may be kept by the fraud prevention agencies and may result in others refusing to provide services, financing or employing to you.

5 How we share your data

This section explains how your data will be shared by us

Who we share your personal data with:

We may share your personal data we hold about you with the following third parties for the reasons explained in the table in Section 4:

- Third party organisations with whom we get and also share your data as described in Section 2 and 4.
- Government organisations such as Companies House, HMRC, Trading Standards
- Fraud prevention organisations and agencies in relation to Money Laundering
- Professional auditing bodies for auditing purposes

6 Sending data outside the EEA

We will not send any data outside the EEA unless requested by yourselves in writing for specific purposes outlined by you.

7 How long will we store your information?

Due to accounting purposes, any legal requirements, and data stored in relating to accounting matters will be kept for 6 years.

For any other data stored relating to other data we may hold on you i.e. passwords for websites and social media requirements or other information this will be deleted on request by you within 28 days of written receipt or instruction.

We will uphold your rights to the best of our abilities; however, data protection law allows us to continue to access your personal data if we have a legitimate reason to do so. For example, if it is needed for fraud prevention or legal requirements.

8 Subject Access Request

You have the right to obtain:

- Have confirmation your data is being processed
- Access to your personal data
- Other supplementary information which is referred to in this privacy notice

You can request this data in writing by writing to us at The Tall Dog, PO BIX 131, Midhurst, West Sussex, GU29 1BY

9 Complaints

If you are not happy with the way your personal data is held or processed, please tell us using the contact details above.

You can complain to the Information Commissioners Office (ICO), the UK supervisory authority for data protection issues.

10 Policy Updates

We may update or amend this privacy notice from time to time to comply with the law or meet changing business requirements. Any changes to this policy will be posted on this page.

This version was last updated on 27th August 2018 to comply with the new GDPR regulations from 25th May 2018. Historic versions are archived and you can get these by contacting us.

11 Glossary

Compliance with legal obligation means processing your data where it's needed for compliance reasons with a legal or regulatory obligation.

Contract means using your data where it is needed to carry out a contract that involves you or to take steps at your request before entering into a contract of services

Contractual Requirements means using your data where it's needed to carry out a contract that involves you or to take steps at your request before entering into a contract.

Data Protection Law means the General Data Protection Regulation (EU 2016/679) and any national implementing laws, regulations or secondary legislation, as amended or updated from time to time, in the UK.

Legitimate Interest means our interest in conducting and managing our business to allow us to give you the best services and the best and most secure experience. We make sure we consider and balance any possible impact on you (both positive and negative) and your rights before we process your personal data. We don't use your personal data for activities where our interest is overridden by the impact on you (unless we have your consent or are otherwise allowed to or required by law).

IP address is the term used for an Internet Protocol address which is a numerical code that each device connect to the internet has in order to identify that device. Although this data maybe collected within the framework of our websites or client's websites we have built, we or they do not actively use this data for any purpose.

Regulatory Obligations means processing your personal data where it's needed for compliance reasons, with a legal or regulatory obligation.