

# H2O ACCOUNTING LTD – PRIVACY NOTICE

## *Who we are*

H2O Accounting LTD (“H2O”, “we”, “us” or “our”) is an accountancy and tax advisory firm. We are registered in England and Wales as a limited company under number: 06845935. Our registered office is at Dimmicks Corner, 179 Hunts Pond Road, Titchfield Common, Hampshire, PO14 4PL.

For the purpose of the Data Protection Legislation and this notice, we are the ‘data controller’. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

We have appointed a Data Protection Officer, Hannah Oliver. Our Data Protection Officer is our Data Protection Point of Contact and is responsible for assisting with enquiries in relation to this privacy notice or our treatment of your personal data. Should you wish to contact our Data Protection Point of Contact you can do so using the contact details noted [below](#).

H2O takes pride in maintaining the trust and confidence of our clients, staff and all visitors to our website, so it’s important for you to know that H2O does not sell, rent or trade email lists, in any way, with other companies or businesses for marketing purposes.

To put your mind at ease, we’ve laid out what you need to know on when and why we collect your personal data, how it might be used, and how we keep it secure. You’ll also find out what rights you have when it comes to your personal information and under what conditions we may be required to disclose any of your personal information to others.

## *What this privacy notice applies to*

It applies to personal data provided to us, both by you individually or by others, for example, HM Revenue and Customs. When collecting and processing your personal data, it is our policy to be transparent about why and how it’s going to be used, please read below for further specifics about our processing activities. Other than the purpose stated at the point of collection, we may also need to use the personal data provided to us for any other purposes described in this privacy statement.

## *What counts as personal data*

Personal data is defined by the Information Commissioner's Office (“ICO”), the UK data protection regulator, as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.’ If you would like more information regarding what qualifies as personal information, please visit [www.ico.org.uk](http://www.ico.org.uk).

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## *Website cookies*

H2O use cookies to collect information. Cookies are small data files which are placed on your devices as you browse our website and are used to 'remember' when you access the site.

These cookies also collect information about browsing behaviour when you access our website via the same device. This includes information about the pages you view and your journey around the site. We do not use cookies to retain any personal information such as your name, address or other contact details.

The cookies stored on your device when you access our website are designed by a third-party service [see below] who help us understand the analytics of our website.

If you would like to disable cookies, you can adjust your settings to reject them. How you do this will depend on the type of browser you use, further details on how to disable cookies can be found online.

Disabling cookies will not change your experience when accessing our website.

## *Google analytics*

We use Google Analytics, a third-party service, to gather standard internet log data and record the behavioural patterns of our visitors.

This is simply to find out details such as the number of visitors to the various parts our website. We use this data to bring you a better and more effective experience.

Importantly, this raw data is only processed in a way that does not identify anyone. We will not make, and do not allow Google to make, any attempt to find out the identities of the visitors to our website.

## *Website enquiries*

If you decide to use our website's enquiries facility, to stop false and spam enquires, we require your name, phone number and email address.

We only use this information when responding to your query and to contact you if we need to obtain additional information.

Like all retained personal data at H2O Accounting LTD, this information will be kept confidential and [securely stored](#) in compliance with the latest data protection regulations.

We don't sell, rent, or trade email lists with any other organisations and businesses.

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## *WiFi*

If you use our private internet while attending H2O Accounting LTD premises, we want you to be aware that we may collect data about:

- the device used to access the network;
- the volume of data used by this device;
- the websites and applications you access through our network; and
- the device access time, frequency and location.

This information is not actively recorded or monitored by us and we do not use this data in any way.

## *Storage and security*

H2O is strongly committed to protecting personal data. We also care about the environment and are in the process of becoming paperless - as a result, we may hold your files in both physical and electronic form.

No matter the form of your data, 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.

We also 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.

For electronic data: At H2O Accounting LTD, we use third-party software and services to support us when providing you the best services we can offer and to help manage our internal IT systems. This includes cloud-based software services, website hosting, data back-up, security and storage services. The servers facilitating this cloud infrastructure are held in secure locations, and personal data may be stored in any one of them.

For physical data: All personal physical records are kept at the premises of H2O Accounting LTD. Where applicable, these records may be copied to our online filing facilities before being securely disposed of or returned to you.

In addition to the above, we have a framework of policies, procedures and training in place which covers security, data protection and confidentiality. These are regularly reviewed to ensure the measures we have in place are appropriate. This includes procedures to deal with any suspected data security breaches. In the event of a breach, we will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Please note, some of the security measures that protect the data of H2O and our clients involve detecting, inspecting and resolving security threats. Because of the

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monitoring we undertake in respect of this, some personal data may be processed, such as our automatic security scans to identify infected/junk emails.

We will not transfer the personal data we collect about you outside of the EEA.

## *Our secure portal*

At H2O we prioritise the security of your personal information and take extensive measures to ensure your privacy in compliance with the General Data Protection Regulation. All our emails are secure, but we are aware that our clients might not need the same level of security that we do. Available free to all our clients, at request, is a secure online portal that can be used to send sensitive information and virtually sign documents.

If you do not already have access and wish to make use of this service, please call the office at 01489 874466, or email [Gill@h2oaccountants.co.uk](mailto:Gill@h2oaccountants.co.uk), to get your invitation link. Please note that if you choose not to use this service, you remain personally responsible for the security of your private email.

## *Types of personal data we might hold about you*

Due to the variety of the services H2O provide, we process many categories of personal data. The information we hold about you may include the following:

- Your contact details, such as your name and address. We never sell, rent or trade your details to other organisations;
- details of contact we have had with you in relation to the provision, or the proposed provision, of our services;
- details of any services you have received from us;
- records of our correspondence and communications with you, this may contain information about any complaints and enquiries you make to us;
- Information we receive from other sources, such as publicly available information, information provided by your employer;
- Your income, tax and other relevant financial details, such as fiscal interests or investments; and
- Your professional activities.

In addition, for some activities and services, we are required by law, or with a client's explicit consent, to collect 'special categories' of personal data. These categories include, but are not limited to, criminal records, religious beliefs, race/ethnic origin, and physical or mental health. If you would like more information about 'special categories' of personal data, please visit [www.ico.org.uk](http://www.ico.org.uk).

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Furthermore, we are a provider of professional services, and as such we are subject to legal, regulatory and professional duties. To demonstrate our services are provided in compliance with those responsibilities, we must keep certain records which may contain personal data. These will be stored securely as described [above](#). For information on our retention periods, please see [data retention](#) below.

## *How we use your personal data*

H2O processes personal data for numerous purposes. The means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose can vary.

We may process personal data for the purposes necessary for the performance of our contract with our clients. This could include processing the personal data for our client's employees, subcontractors, suppliers or customers.

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 explicit consent. In these limited circumstances where your consent is required for the processing of your personal data, you have the right to withdraw your consent to processing for such specific purposes. Please see [Consent](#) below.

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 use your personal data to:

- carry out our obligations arising from any agreements entered between you and us, which will most usually be for the provision of our services;
- carry out our obligations arising from any agreements entered between our clients and us, where you may be a subcontractor, supplier or customer of our client;
- seek your thoughts and opinions on the services we provide; and
- notify you about any changes to our services.

In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

If you refuse 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.

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.

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## *Change of purpose*

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, 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.

## *Data retention*

In cases where there are no explicit legal, supervisory or contractual obligations, the guidelines for our retention period, for all documentation created through the provision of services, is seven years.

In all other cases, we hold your personal data for whatever period is considered obligatory for the purpose's intended at collection as required by, and in accordance with, any applicable laws or regulations.

## *Disclosing your personal data*

At H2O we only share personal data when we are legally permitted to do so. In situations where we need to share your personal information with others, we make sure there are arrangements and security mechanisms in place to protect your data and to comply with the latest data protection, confidentiality and security standards.

Any personal data we hold may be transferred to the following:

- Third-party organisations that provide software applications, data processing or IT services to us.
- Third-party organisations that otherwise assist us in providing goods, services or information.
- Auditors and other professional consultants.
- Law enforcement, other government/regulatory agencies, or to additional third-parties as required by, and in accordance with, any applicable laws or regulations.

We will not transfer the personal data we collect about you outside of the EEA.

There may be occasions where we receive requests from third-parties with the authorisation to obtain your personal data. For example, this may be used to: confirm

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we are complying with applicable laws and regulations; investigate alleged crimes; and defend, exercise or establish individual and legal rights.

All 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 **only** disclose personal data where required, permitted, and in accordance with applicable laws or regulations.*

## *Consent*

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified. Consent is required for H2O to process your personal data, where it is not otherwise covered by a contract, or no other legal basis applies, but it must be explicitly given. Where we are asking you for sensitive personal data, we will always tell you why and how the information will be used.

Please note we usually rely on alternative legal basis's for processing your personal information. However, in cases where personal data is processed based on consent, you have the right to withdraw this consent at any time. To withdraw consent, please email our Data Protection Officer, Hannah Oliver, at [Hannah@h2oaccountants.co.uk](mailto:Hannah@h2oaccountants.co.uk).

## *Changes to your personal information*

It is important that the personal data we hold about you is accurate and current. We ask that should any of your personal information, that we need to be aware of, change, we are notified using the [contact details below](#).

## *Your rights*

From 25 May 2018, under the new General Data Protection Regulations, 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. We are currently required by law to respond to your access request within forty days, nevertheless we will aim to respond to any requests promptly.
- 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 reason for us continuing to

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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.
- 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.

For more information about the extent of these rights, please refer to the guidance provided by the ICO at [www.ico.org.uk](http://www.ico.org.uk).

If you want to exercise these rights, please email any requests to our Data Protection Officer, Hannah Oliver, at [Hannah@h2oaccountants.co.uk](mailto:Hannah@h2oaccountants.co.uk).

We may require specific information from you to help us 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.

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.

## *Complaints*

Although we hope you never feel the need to complain about our handling of your personal information, in the event you are dissatisfied, please email your complaint to our Data Protection Officer, Hannah Oliver, at [Hannah@h2oaccountants.co.uk](mailto:Hannah@h2oaccountants.co.uk).

You also have the right to lodge a complaint with the ICO. For more information on your rights and how to complain to the ICO, please visit [www.ico.org.uk](http://www.ico.org.uk).

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## *Declaration*

This privacy notice has been authorised by Hannah Oliver for and on behalf of H2O Accounting LTD. This privacy notice is kept under regular review to ensure compliance with data protection legislation and any updates will be reflected on [www.h2oaccountants.co.uk](http://www.h2oaccountants.co.uk).

This notice was last reviewed: 24 May 2018.

**This privacy notice will take effect from 25 May 2018.**

## *Contact information*

If you have any questions about this privacy statement, or our processing of your personal data, please contact us at:

H2O Accounting LTD  
Dimmicks Corner  
179 Hunts Pond Road  
Titchfield Common  
Hampshire  
PO14 4PL

Phone: 01489 874466

Email: [info@h2oaccountants.co.uk](mailto:info@h2oaccountants.co.uk)