

# PRIVACY POLICY

The privacy policy explains how we use any personal information we collect about you when you use our services.

## Glossary of Terms:

### What is personal data?

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?

For general data protection regulation purposes, the “*data controller*” means the person or organisation who decides the purposes for which and the way in which any personal data is processed. The data controller is **Inform Accounting**.

### 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.

### What information do we collect about you and how?

**Inform Accounting**, as a Data Controller, is bound by the requirements of the General Data Protection Regulations (GDPR).

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



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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</b>

A more detailed breakdown of the data we collect, the third party applications we share specific data with and staff access privileges to personal data can be accessed on request.

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

## Use of Your Personal information

We will only use your personal data when the law allows us to, and most commonly to enable us to perform the Services for you.

### How will we use the information about you and why?

At **Inform Accounting** we take your privacy seriously and will only use your personal information to provide the Services you have requested from us, detailed in your Letter of Engagement and supporting services Schedules and as we have identified above. We will only use this information subject to your instructions, data protection law and our duty of confidentiality.

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.

Our work for you may require us to pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing the Services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the Services and we have contracts in place that requires them to keep your information secure and not to use it for their own

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direct marketing purposes.

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

### Third Party Service Providers used by Inform Accounting

Links to the third party software providers GDPR / current Privacy Policies / Security:

Xero:	<a href="https://www.xero.com/uk/about/terms/privacy/">https://www.xero.com/uk/about/terms/privacy/</a>
Receipt-Bank:	<a href="https://www.receipt-bank.com/privacy-policy/">https://www.receipt-bank.com/privacy-policy/</a>
GoCardless:	<a href="https://gocardless.com/security/">https://gocardless.com/security/</a>
Practice Ignition:	<a href="https://www.practiceignition.com/privacy">https://www.practiceignition.com/privacy</a>
Futrli:	<a href="https://www.futrli.com/privacy-policy/">https://www.futrli.com/privacy-policy/</a>
BrightPay:	<a href="https://www.brightpay.co.uk/pages/privacy-policy/">https://www.brightpay.co.uk/pages/privacy-policy/</a>
Google:	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>
Digita:	<a href="https://www.thomsonreuters.com/en/privacy-statement.html">https://www.thomsonreuters.com/en/privacy-statement.html</a>
Ledgerscope:	<a href="https://www.ledgerscope.com/privacy-policy/">https://www.ledgerscope.com/privacy-policy/</a>
LastPass:	<a href="https://www.logmeininc.com/legal/privacy">https://www.logmeininc.com/legal/privacy</a>
Hubspot:	<a href="https://legal.hubspot.com/privacy-policy">https://legal.hubspot.com/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>
Trello:	<a href="https://trello.com/privacy-updated">https://trello.com/privacy-updated</a>
Government Digital Services:	<a href="https://www.gov.uk/help/privacy-policy">https://www.gov.uk/help/privacy-policy</a>
Taxcalc:	<a href="https://www.taxcalc.com/legal.php">https://www.taxcalc.com/legal.php</a>
True Potential:	<a href="https://www.tpllp.com/privacy/">https://www.tpllp.com/privacy/</a>
hronline (Peninsula Group)	<a href="https://www.brighthr.com/terms">https://www.brighthr.com/terms</a>
Vitality Health	<a href="https://www.vitality.co.uk/legal/">https://www.vitality.co.uk/legal/</a>
Kimbley IT	<a href="https://www.kimbley.com/">https://www.kimbley.com/</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>
Inform Direct	<a href="https://www.informdirect.co.uk/privacy-policy/">https://www.informdirect.co.uk/privacy-policy/</a>
DocuSign	<a href="https://www.docusign.com/company/privacy-policy">https://www.docusign.com/company/privacy-policy</a>

We collect information on our website only to process your enquiry. If you agree, we will also use this information to share updates with you about our services which we believe may be of interest to you.

### Transferring your information outside of Europe

Storing Your Personal Information. 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 maybe 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.

Unfortunately, the transmission of information via the internet is not completely secure. Although



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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.

### **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.

### **Marketing**

We will periodically send you free newsletters and emails that directly promote the use of our Platform, or Services. 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.

### **How long will we hold your data for?**

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

- Marketing: We will hold your data for an unspecified period, unless you choose to opt out or update or delete data at any point should you need to do so and details are set out in this policy as to how to do that.
- Contracted Services: We will hold your data for a minimum period of 6 years in line with our regulatory requirements. We may hold onto your data for extended periods should the our obligations under law change.

## **Access to your information, correction, portability and deletion**

### **What is a Subject Access Request?**

This is your right to request a copy of the information that we hold about you. You may request deletion of your personal information by us, and we will use commercially reasonable efforts to honor your request, but please note that we may be required to keep such information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete any information, it will be deleted from the active database, but may remain in our archives. We may also retain your information for fraud prevention or similar purposes.



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If you would like a copy of some or all your personal information, please email: [hello@informaccounting.co.uk](mailto:hello@informaccounting.co.uk). We will respond to your request within one month of receipt of the request.

We want to make sure your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate by emailing [hello@informaccounting.co.uk](mailto:hello@informaccounting.co.uk).

### **Objections to processing of personal data**

It is your right to lodge an objection to the processing of your personal data if you feel the “ground relating to your particular situation” apply. 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 claims.

If you consider that our grounds for processing your personal information infringes data protection laws, you have a legal right to make a complaint to the ICO (the data protection authority in the UK). You can do this through the ICO website: <https://ico.org.uk/concerns/>

### **Data Portability**

It is also your right to receive the personal data which you have given to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without delay from the current controller if:

- (a) The processing is based on consent or on a contract, and
- (b) The processing is carried out by automated means.

### **Your Right to be Forgotten**

Should you wish for us to completely delete all information that we hold about you please request by emailing [hello@informaccounting.co.uk](mailto:hello@informaccounting.co.uk).

## **Cookies**

### **About Cookies**

A cookie is a 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.

Cookies bay be ‘persistent’ (expire after a specific period) or ‘session’ (end when the web browser is closed). Most web browsers allow you to refuse cookies, and to delete cookies from your cache, although this may affect the usability of many websites.

### **Cookies that we use**

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

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will have their own cookie policy available to view on their website.

## **Our Details**

This website is owned and operated by Inform Accounting.

We are a limited company registered in England and Wales under registration number 06872641, and our registered office address is at Unit 11 Wrens Court, 46 South Parade, Sutton Coldfield, West Midlands, B72 1QY.

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.