

# March Consulting (East Anglia) Limited

## Privacy Policy

At March Consulting we take the protection of your privacy very seriously. This privacy policy explains how we use any personal information that we collect about you.

### How do we collect information about you?

We obtain information about you when:

- you engage us for professional services,
- you enquire about a potential engagement with us,
- when we are engaged to act as a data processor on behalf of a data controller (for example, when we carry out our payroll services on behalf of an employer),
- you provide us with your personal details when you contact us

The information collected will generally be obtained directly from you or from a third party which you have provided authority to as your agent. If we are acting as a data processor (e.g. payroll services), the information may be passed to us via the data controller.

### What type of information do we collect about you?

For our professional services, the information collected may relate to your personal and financial circumstances, for us to provide the service that we have been engaged to undertake. For example, we may record your name, address, telephone number, email address, date of birth, unique tax reference, national insurance number, bank account details, data in relation to your personal taxation circumstances, data regarding your business activities, etc.

This could be a service for which either you or a third party have engaged us. For example, we may need to obtain personal data when we are acting as a data processor on behalf of a data controller (such as when we have been engaged to undertake bookkeeping services for a client).

If you have actively consented to receive electronic marketing material, we will hold details of your name and contact information. You can unsubscribe at any point by emailing [ian@marchconsultingltd.co.uk](mailto:ian@marchconsultingltd.co.uk), phoning or writing to us (please see the “Contact information” section below).

Our website is compliant with EU regulations on cookies. If you visit our website to read or download information, such as news stories or articles, all of the information we collect is statistical only and not personally identifiable. You can disable cookies at any point.

## **Why do we need to collect and use your personal data?**

Our primary lawful basis for processing personal data is for the performance of our contracts with our clients and staff. This includes the processing of personal data when we are engaged by a data controller to provide our services as a data processor.

The information that we collect is essential for us to be able to carry out the agreed contract effectively. Without collecting personal data we would be unable to fulfil our legal and regulatory obligations.

We will also use this data to notify clients of any news that we feel is relevant to our duty of care (for example, updates relating to changes in tax legislation or industry specific information). Where possible, we will communicate these updates electronically.

For marketing purposes, we will only contact you electronically if you have given us consent to do so. You are entitled to unsubscribe at any point and request to be removed from our marketing database.

We may also contact you from time to time if we feel you or your organisation has a legitimate interest in knowing information about our products or services. You are entitled to unsubscribe and be removed from the marketing database at any point by emailing [ian@marchconsultingltd.co.uk](mailto:ian@marchconsultingltd.co.uk), telephoning or writing to us (please see the "Contact information" section below).

## **How will we use the information about you?**

In general terms, and depending on which services we are engaged to deliver, as part of providing our agreed services we may use your information as follows:

For our business services (including those that we provide as a data processor):

- contact you by post, email or telephone
- verify your identity where this is required
- understand your needs and how they may be met
- maintain our records in accordance with applicable legal, regulatory and corporate governance obligations and good practice, ensuring our business policies are adhered to
- process financial transactions (this may include credit scoring and checking)
- prevent and detect crime, fraud or corruption
- complete our agreed services (such as completion of your personal tax return or business accounts), along with assisting in the gathering of information as part of investigations by regulatory bodies or in connection with legal proceedings or requests
- for operational reasons, such as recording transactions, training and quality control, ensure the confidentiality of commercially sensitive information

- investigate complaints
- market our business
- improve our services

### **Who might we share your information with?**

If you are our client, in order to deliver our services to you effectively we may send your details to third parties such as those that we engage for professional compliance, accountancy or legal services as well as product and platform providers that we use to manage book-keeping services for you (where applicable).

Where third parties are involved in processing your data, we disclose only the personal information that is necessary to deliver the service. We have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they will only act in accordance with our written instructions.

Where it is necessary for your personal data to be forwarded to a third party we will use appropriate security measures to protect your personal data in transit.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime we may send your details to third party agencies for identity verification purposes.

We will not share your information for marketing purposes.

Any staff with access to your information have a duty of confidentiality under the ethical standards that this firm is required to follow.

If you are a member of staff, if there is a need to complete security vetting checks (such as DBS / CRB checks) in relation to work, we may need to pass your information on to the relevant third party for review. This is the only occasion when a third party processor is used in relation to staff personal data.

### **Transfer of your data to other countries**

On rare occasions in the course of carrying out our specifically engaged services, we may transfer your data to other countries, which may not have the same legal protections for your data as the UK.

Where data is being transferred outside of the European Economic Area, we take steps to ensure that your data is adequately protected in accordance with UK legal requirements. Where we are in a contractual relationship with the recipient, such protection will normally consist at minimum of appropriate contractual protections agreed between us and the recipient.

### **How long do we keep hold of your information?**

In principle, your personal data should not be held for longer than is required under the terms of our contract for services with you. However, we are subject to regulatory requirements to retain data for specified minimum periods. We also reserve the right to retain data for longer than this where we consider it is in your interest for us to do so.

With regards to client data (and data which we obtain whilst acting as a data processor on behalf of a data controller), we will retain your personal data for a minimum of 7 years.

For marketing purposes, where you have consented to hear from us, if we haven't made contact within 2 years, we will remove you from our database (unless you have already asked to be removed).

For staff, we will retain your personal data for a minimum of 6 years after your employment ceases.

### **Security precautions in place to protect the loss, misuse or alteration of your information**

Whilst 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 efforts to ensure its security on our systems. Where we have given, or where you have chosen, a password which enables you to access information, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Your data will usually be processed in our two offices in the UK (Hitcham & Stowmarket Suffolk) and stored within these UK-based data centres. We take the security of your data seriously and so all our systems have appropriate security in place that complies with all applicable legislative and regulatory requirements.

### **Your rights**

#### **Access to your information**

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please contact us using the details noted below in the "Contact information" section.

When your personal data is processed electronically, you have the right to ask us to move your personal data to another organisation.

#### **Correcting your information**

We want to make sure that your personal information is accurate, complete and up-to-date and you may ask us to correct any personal information about you that you believe does not meet these standards.

#### **Deletion of your information**

You have the right to request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

### **Restricting how we may use your information**

In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where there is no longer a basis for using your personal information but you do not want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

### **Objecting to how we may use your information**

Where we use your personal information to perform tasks carried out in the public interest then, if you object to this use and ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

Please contact us in any of the ways set out in the “Contact information” section below if you wish to exercise any of these rights.

### **Changes to our privacy policy**

We keep this privacy policy under regular review and will place any updates on our website. Paper copies of the privacy policy may also be obtained from each of our offices on request.

This privacy policy was last reviewed on 20th May 2018.

### **Contact information**

If you have any questions about our privacy policy or information we hold about you please use the following contact details:

Data Privacy Officer:	Ian Coombes
Email address :	<a href="mailto:ian@marchconsultingltd.co.uk">ian@marchconsultingltd.co.uk</a>
Post:	Ian Coombes
March Consulting (East Anglia) Limited Friday Lane Cottage Church Lane Hitcham Suffolk IP7 7NN	
Telephone number:	01449 740285

### **Complaints**

We seek to resolve directly all complaints about how we handle your personal information but you also have the right to lodge a complaint with the Information Commissioner's Office at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone - 0303 123 1113 (local rate) or 01625 545 745

Website: <https://ico.org.uk/concerns>