



BW Business Accountants & Advisers Limited - Privacy Notice

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and lead authorities in the event you have a complaint.

This notice was last updated on Monday November 8th, 2021, and complies to the UK GDPR (2021), underpinned by the Data Protection Act (2018), additional relevant data protection legislation and is regulated by the UK Information Commissioners Office (ICO).

Scope & Responsibilities

Our scope is any data subject, whose personal data is collected, in line with the requirements of UK GDPR (2021), the Data Protection Act (2018), and other relevant UK data protection legislation.

The UK GDPR (2021) has a particular material scope covering personal data that is processed electronically and personal data that is part of a filing system or intended to be part of a filing system (i.e., any personal data that may be uploaded to a computer/electronic device or stored in a structured paper filing system).

BW Business Accountants & Advisers Limited adheres to the territorial scope of UK GDPR (2021). The regulation applies to all controllers and processors based in the UK, regardless of where the processing takes place.

BW Business Accountants & Advisers Limited will adhere to the UK GDPR (2021) seven data processing principles when handling personal data. Further details are provided by the ICO with regards to these seven [data processing principles](#).

BW Business Accountants & Advisers Limited has further responsibilities with regards to controlling and processing personal data, which fall under the responsibility of the data protection lead and/or nominated data protection officer (DPO). Responsibilities include being a well-resourced, point of contact with the UK lead authority the Information Commissioners Office (ICO) and all data subjects.

All associates and employees of BW Business Accountants & Advisers Limited who interact with data subjects are responsible for ensuring that this privacy notice is drawn to the data subject's attention.

Who we are

BW Business Accountants & Advisers Limited provides services including ongoing accounts to ad-hoc support, and from your annual returns to Chartered Tax Advice. BW Business Accountants & Advisers Limited is a private limited company, in England and Wales, under company registration number 13155780.

natalie@bwbusinessadvisers.co.uk
0117 2872704

www.bwbusinessadvisers.co.uk

BW Business Accountants & Advisers is the trading name of BW Business Accountants & Advisers Limited, a limited company registered in England and Wales. Director: Natalie Binstead ACA CTA.
Registered address: 18 Humphrys Barton, St Anne's Park, Bristol BS4 4NS. Company number: 13155780.



BW Business Accountants & Advisers Limited is registered with the ICO under registration number ZA922420.

BW Business Accountants & Advisers Limited collects, controls and processes certain personal information about you, when we do so we are regulated under the [UK General Data Protection Regulation](#), which is underpinned by the [Data Protection Act \(2018\)](#) and other UK data privacy legislation.

We are responsible as the data controller & data processor for all personal information collected, controlled, and processed under those laws and regulations. The data protection lead is Natalie Binstead of BW Business Accountants & Advisers Limited.

BW Business Accountants & Advisers Limited can be contacted via email hello@bwbusinessadvisers.co.uk or via phone on 0117 287 2704.

Whether information must be provided by you, and if so, why?

The provision of certain personal data including (but not limited to) contact name, email address & telephone number is required from you. This enables BW Business Accountants & Advisers Limited to identify you and provide our accountancy services to you.

It may also be a legal requirement to obtain proof of identity from time to time. If this is required, we will explain why, what identification is required, how long the personal data will be kept on file and the necessity for the processing.

We will inform you at the point of collecting information from you, whether you are required to provide this and any other additional information to us.

Lawful bases for processing of personal data

The lawful bases for processing are set out in Article 6 of the UK GDPR (2021). At least one of these must apply whenever BW Business Accountants & Advisers Limited processes your personal data:

- **Contract** - the processing is necessary for BW Business Accountants & Advisers Limited to fulfil the obligations of an agreement or contract for the provision of our accountancy services. Both parties would be provided with a copy of the contract and a copy of this privacy notice.
- **Legal Obligations** – the processing is necessary for BW Business Accountants & Advisers Limited to meet the requirements of UK law and/or regulatory compliance. BW Business Accountants & Advisers Limited will identify the source for obligation (e.g., HMRC) and explain why your personal data is required to meet such obligations.

- **Legitimate Interests** - the processing is necessary, as BW Business Accountants & Advisers Limited has ascertained the legitimate interest of the individual/organisation and explained why the processing of personal data is required to action the legitimate interest. BW Business Accountants & Advisers Limited reviews this lawful basis to hold personal data annually via a Legitimate Interests Assessment (LIA).

You can find more about the UK GDPR lawful bases [here](#) or by visiting www.ico.org.uk

What information we collect about you

The personal data you have provided, or we have collected from you, includes but is not limited or restricted to:

- **Personal Contact Data** (e.g., contact name, email addresses, telephone numbers)
- **Addresses** (e.g., place of work and/or residential addresses)
- **Credit Account Data** (e.g., company registration number, how many years trading, bank details and contact details of credit referees)
- **General Accounting and Payroll Services Data** (e.g., National Insurance number, date of birth, tax code/previous earnings year to date, RTI number, start date and right to work details, SMP, SPP and SSP details, pension scheme and contribution details, attachment of earnings and court order details)
- **Identity Data** (e.g., proof of identity such as UK driving licence, UK passport, utility bills, etc.)

How we use your personal information

BW Business Accountants & Advisers Limited uses your personal information:

- **To pre-qualify which of our accountancy services are suitable for your requirements** (e.g., responding to website contact forms, written correspondence, email requests for our services, telephone calls, referrals).
- **To provide our accountancy services** (e.g., provision of agreements and contracts, for processing of financial records, for processing of payroll, for submissions to HMRC and for compliance with audits).
- **To communicate with you, via official BW Business Accountants & Advisers Limited communication channels** (e.g., to fulfil the objectives as outlined in the agreements and contracts).
- **To facilitate client and prospect meetings** (e.g., to set-up and confirm meetings, either electronically via video call, such as Microsoft Teams or Zoom or to arrange site meetings at client nominated premises).
- **To provide client after care and client support** (e.g., obtaining feedback, contract renewal).

- **To keep you informed of any BW Business Accountants & Advisers Limited company updates** (e.g., changes to this privacy notice, other important company updates).
- **To produce invoices and receipts for our accountancy services.**
- **To provide compliance with all the legal requirements of England and Wales.**

Who we share your personal information with

Where relevant, given the nature of the accountancy services provided to you by BW Business Accountants & Advisers Limited, we may also share your personal data with the following categories of third parties:

- Trusted 3rd party partners who we work alongside and process personal data on behalf of BW Business Accountants & Advisers Limited, with regards to agreements and contracts for example, or for the provision of supplementary support services (e.g., HR or legal). Disclosure of the nominated trusted 3rd party partner would be provided at the agreement/contract stage and a relevant Data Processing Agreement (DPA) would be put in place to protect all personal data, from a data controller, data processor and data subject perspective.
- Third party service providers who support the operation of our business, such as Xero.
- Fraud prevention agencies, money laundering agencies and associations.
- Regulators and law enforcement agencies, including the police, HM Revenue and Customs or any other relevant authority who may have jurisdiction.

We would always inform you ahead of acting on any instructions to proceed with any of our accountancy services, should this be the case.

This data sharing enables BW Business Accountants & Advisers Limited to supply the above accountancy services to you in a professional and timely manner, whilst undertaking quality control & regulatory compliance procedures.

Furthermore, it ensures compliance with all necessary UK GDPR (2018), Data Protection Act (2018) and other UK data protection legislation lawful requirements. BW Business Accountants & Advisers Limited will share personal information with law enforcement or other authorities if required by law.

International Data Transfers

BW Business Accountants & Advisers Limited does not control, process, or transfer personal data outside of the UK.

Should this situation change, BW Business Accountants & Advisers Limited would issue a company update via our official communication channels to all affected parties. If the international data transfer would fall within the European Union/EEA, data would be able to flow freely under the 'Adequacy Decision' agreed between the UK and European Parliament on June 27th, 2021. If the international data transfer is outside the EU/EEA/UK then appropriate safeguards would be put in place, such as Data Protection Impact Assessments (DPIAs).

This Privacy Notice would also be updated. Further information on [International Data Transfers](#) is provided by the Information Commissioners Office.

How long your personal information will be kept

- We will retain your personal information for several purposes, as is necessary to allow us to carry out our business in accordance with our contract or legitimate interests and is necessary for compliance with our legal obligations.
- Any retention of personal data will be carried out in compliance with legal and regulatory obligations. These data retention periods are subject to change, due to any revisions of associated legislation or regulations.
- Your information will be kept for up to 7 years after the completion of the contract on our main systems, after which time it will be archived, deleted, or anonymised depending on the content of the material and whether there is any continuing legal need for it to be retained. For example, some of the archived information may be retained for a further period due to a HMRC audit for example.
- 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.
- To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- Details of retention periods for different aspects of your personal data are available in our Data Retention Policy which you can request from us by [contacting us](#).
- Any personal data held in hard document copy is securely stored pre-destruction, securely destroyed, with a Certificate of Destruction issued in line with our UK GDPR (2021) Data Retention Policy.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable lead authority and/or regulator (e.g., ICO) of a suspected data security breach where we are legally required to do so.

If you want detailed information from, Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses, and many other online problems, please visit www.getsafeonline.org.

Get Safe Online is supported by HM Government and leading businesses.

Cookies

We use cookies to collect, store and share bits of information about your activities when you use our website.

Cookies do different things, like letting you navigate between pages quickly and generally improving your experience of our website. If our website did not use cookies, it will think you are a new visitor every time you move to a new page on the website.

BW Business Accountants & Advisers Limited only uses 'non-personal data' essential cookies on our website, to track the performance of the website via Google Analytics. This tracking helps us to understand how to improve the website content for the benefit of all users. If you want to block cookies, then you can do this through your browser via the help function. The ICO also offers further guidance on [cookies and similar technologies](#).

Your rights

Under the UK GDPR you have several important rights as a data subject. At any point while we are in possession of or processing your personal data, you, the data subject (living person), have the following rights:

- **Right to be informed** – you have the right to know why we are collecting and processing personal data and this right is met by the provision of this privacy notice and any subsequent updates.
- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.

- **Right to object to automated processing, including profiling** – you also have the right to be subject to the legal effects of automated processing or profiling.

For further information on each of these rights, including the circumstances in which they apply, see the guidance from the [Information Commissioner's Office \(ICO\) on individuals rights under the UK General Data Protection Regulation](#).

If you would like to exercise any of these rights, please:

- call, email, or write to us in the first instance.
- let us have enough information to identify you,
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates.

Changes to this privacy notice

This privacy notice was last reviewed and published on Monday November 8th, 2021. We may change this privacy notice from time to time, when we do, we will inform you via our company communication channels and company website.

BW Business Accountants & Advisers Limited is a private limited company, in England and Wales, under company registration number 13155780.

BW Business Accountants & Advisers Limited is registered with the ICO under registration number ZA922420.

How to complain

We hope that we can resolve any query or concern you raise about our use of your personal data.

Should we not be able to do so, the [UK General Data Protection Regulation](#) gives you the right to lodge a complaint with the lead authority.

The lead authority in the UK is the Information Commissioner's Office (ICO) who may be contacted [here](#) or by telephone on 0303 123 1113.

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

The data protection lead is Natalie Binstead. BW Business Accountants & Advisers Limited can be contacted via email hello@bwbusinessadvisers.co.uk or via phone on 0117 287 2704.