

PRIVACY POLICY

Purpose

This Policy outlines the data protection policies and procedures we have adopted and to which we abide to ensure we are GDPR compliant. The purpose of this Policy and any other documents referred to in it, is to clearly list and identify the legal requirements, procedures and rights which must be established when we obtain, process, transfer and/or store your personal data. This Policy will assist you in understanding the obligations, responsibilities and rights which arise from the Data Protection Laws.

References in this Privacy Notice to 'GDPR' will include any 'UK GDPR' created by the UK Data Protection ACT 2018 on the UK's exit from the European Union.

Introduction

At Heather Nunn Business Services Ltd, we are committed to protecting your privacy. This Policy explains when and why we collect personal information about people with whom we work, how we use it, the conditions under which we may disclose it to others and how we keep it secure. It applies to information we collect about:

- people who use our services;
- job applicants and our current and former employees;
- visitors to our websites;
- and other individuals with whom we communicate.

We regard the lawful and correct treatment of personal information as integral to successful operation and to maintaining the confidence of the people we work and communicate with. To this end we fully endorse and adhere to the principles of the relevant Laws.

We are registered as a Data Controller on the Register kept by the Information Commissioner's Office.

Any questions regarding this Policy and our privacy practices should be sent to the contact information provided at the end of this Policy.

Please be aware that, in all circumstance, we will never collect sensitive information about you without your explicit consent. The personal information which we hold will be held securely in accordance with our internal security policy and the law.

When you visit our website

When someone visits <http://www.hnbusiness.co.uk/> we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

When you make an 'information request', using the website form on the contact page, your information is sent securely as an encrypted email. This means that your information can only be read when it has reached the inbox of Heather Nunn Business Services.

We make every effort to have technology in place to protect our website from cyber attacks and spammer activity which could result in breaches of data protection. However, it is not impossible, although rare, for some illicit cyber activity to be successful. Heather Nunn Business Services will not be held liable for breaches of data protection resulting from illegal cyber activity. However, we will inform website users of any breaches that we are aware of as far as possible and as soon as possible. We recommend viewing and using the website on computers that are running up-to-date security software and the latest internet browser versions for optimal data security.

When you email us

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

When you enquire with us or make a complaint

When enquiries are submitted to us we will only use the information supplied to enable us to deal with the enquiry itself.

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information we collect to process the complaint itself.

We will keep personal information contained in complaint files in line with our retention policy. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

When you use our services

Heather Nunn Business Services Ltd offers various business services.

We will only collect and process your Personal Data to the extent that it is needed to fulfil our operational and contractual needs or to comply with any legal requirements including those relating to the prevention of money laundering or terrorist financing. We have to collect and hold the details of the people who have requested the service in order to provide it. However, we only use these details to provide the service the person has requested and for other closely related purposes. For example, we might use information about people who have subscribed to any of our services to carry out a survey to find out if they are happy with the level of service they received.

We shall access and use your Personal Data in accordance with your instructions and as is reasonably necessary:

- to fulfil our contractual obligations and responsibilities to you;
- to provide, maintain and improve our contracted service with you;
- if we intend to use your personal data for the advertising and marketing of our services and/or the services of our affiliates. We shall seek your separate express consent and you are entitled to opt out of these services at any time;
- to respond to your requests, queries and problems;

- to inform you about any changes to our services and related notices, such as security and fraud notices.

Providing us with information about others

When clients provide us with personal information about someone else, such as for processing a payroll, they are responsible for ensuring compliance with any consent obligations under GDPR law. In so far as required, clients must ensure they have provided the required notices with regards to third party processors, have obtained the individual's explicit consent or otherwise have a legal basis to provide us with the information. Data subjects can be directed to this Privacy Notice.

When you are employed by us

When individuals apply to work at Heather Nunn Business Services Ltd, we will only use the information they supply to us to process their application and to prove their right to work in the UK. Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the Disclosure and Barring Service we will not do so without informing them beforehand unless the disclosure is required by law.

Once a person has taken up employment with Heather Nunn Business Services Ltd, we will compile a file relating to their employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to that person's employment. Once their employment with Heather Nunn Business Services Ltd has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it.

There are also circumstances where we can pass on personal data without consent, for example; to prevent and detect crime and to produce anonymised statistics.

How you can access and update your information

Heather Nunn Business Services Ltd tries to be as open as it can be in terms of giving people access to their personal information. You are entitled to request access to your personal data unless providing a copy would adversely affect the rights and freedoms of others. Individuals can find out if we hold any personal information by making a 'subject access request' under the General Data Protection Regulation. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to Heather Nunn Business Services Ltd for any personal information we may hold about you, you need to put the request in writing and address it to us at the address provided below, or email us. You may also telephone us, but we may suggest that you put your request in writing to assist us in establishing your identity. When responding to written requests Personal Data will only be disclosed if we can confirm your identity and/or sufficient supporting evidence is provided by you to establish your identity. These procedures are to ensure that the data is only given to a person who is entitled to receive it.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct, update, amend, or remove it without undue delay.

Once receiving a request to remove your data we must erase your Personal Data without delay, unless an exception applies that permits us to continue processing your data. Details of such exceptions are contained in the Enactments and include situations where we might need to retain the information to carry out our official duties and/or comply with legal obligations and/or for the establishment of exercising or defending legal claims, or it is in the public interest to retain your Personal Data.

Who has access to your information?

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

There are times when we may need to share your Personal Data with third parties. For example, in the course of us fulfilling our role as your bookkeeper or payroll provider or for the purposes of completing tasks and providing services to you on our behalf (for example processing payments and send you mailings) it will be necessary for us to disclose your Personal Data (which include, but are not limited to):

- with certain bodies to fulfil our contract with you, such as your suppliers, contractors and sub-contractors, HMRC, ICB and other governmental, regulatory bodies.
- with software providers to process electronic data, including personal data, such as Sage, Intuit, Xero etc. Our software providers state that they are GDPR compliant and/or apply equivalent/adequate safeguards.
- if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, lawful requests, court orders and legal process.
- To protect our rights, property, or safety and that of our employees, members, or others, in the course of investigating and preventing money laundering and fraud.

When we use third party service providers, we disclose only the personal information that is necessary to deliver the service.

There are also circumstances where we can pass on personal data without consent, for example; to prevent and detect crime and to produce anonymised statistics.

We use secure external servers to process/store our electronic records, including your Personal Data which are maintained by Netmatters Ltd.

We will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime and to produce anonymised statistics.

Transferring your Personal Data out of the UK

We shall only transfer any Personal Data we hold to a country outside the UK, if one of the following conditions applies:

- UK 'adequacy regulations' in relation to the country or territory where the receiver is located or a sector which covers the receiver (which currently includes countries in the EEA and countries, territories or sectors covered by existing EU 'adequacy decisions'.

Appropriate safeguards are put in place if the country of transfer does not meet the 'adequacy regulations'.

- The country to which your Personal Data shall be transferred ensures an adequate level of protection and can ensure your legal rights and freedoms, determined via a risk assessment.
- You have given your consent that your Personal Data is transferred if this applies.
- The transfer is necessary for one of the reasons set out in the Enactments, including the performance of a contract between you and us, or to protect your vital interests.
- The transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims.
- The transfer is authorised by the ICO and we have received evidence of adequate safeguards being in place regarding the protection of your privacy, your fundamental rights and freedoms, and which allow your rights to be exercised.

The Personal data we hold may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Those Data Users may be engaged in, among other things, the fulfilment of contracts with you, such as the processing of payment details and/or the provision of support services.

Your choices

You may opt out of receiving promotional communications from Heather Nunn Business Services Ltd by emailing us to opt out of receiving such communications.

Although opt-out requests are usually processed immediately, please allow ten (10) business days for a removal request to be processed. Even after you opt out from receiving promotional messages from us, you may continue to receive relevant messages concerning any contracted service you have in place with us.

Our policy towards children

Heather Nunn Business Services Ltd services are not directed to individuals under 13. We do not knowingly collect Personal Information from children under 13. If we become aware that a child under 13 has provided us with Personal Information, we will take steps to delete such information. If you become aware that a child has provided us with Personal Information, please contact us.

Data storage, transfer and security

Heather Nunn Business Services Ltd takes security seriously. We take various steps to protect information you provide to us from loss, misuse, and unauthorised access or

disclosure. These steps take into account the sensitivity of the information we collect, process and store, and the current state of technology.

Heather Nunn Business Services Ltd hosts data with hosting service providers within the EEA. The servers on which Personal Information is stored are kept in a controlled environment.

Our employees and contracted personnel are bound to our privacy policies, procedures and technologies which maintain the security of all your Personal Data from the point of collection to the point of destruction:

- We maintain data security by protecting the confidentiality, integrity and availability of your Personal Data. We ensure that the only people authorised to use your personal data can access it. We use a secure online portal system for the secure transfer of information.
- We ensure your Personal Data is accurate and suitable for the purpose for which it is processed.

We shall take appropriate security measures against unlawful and/or unauthorised processing of personal data, and against the accidental loss of, or damage to, your Personal Data.

Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Use of cookies

You can read more about how we use cookies in our Cookie Policy.

Links to other websites

This Policy does not cover the links within our website linking to other websites. If you submit Personal Information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

Complaints or queries and How to Contact Us

Heather Nunn Business Services Ltd tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

If you feel that your questions or concerns regarding your Personal Data have not been dealt with adequately or that your request has not been fulfilled by us, you can use our complaints procedure, by writing to us or emailing us:

Heather Nunn Business Services Ltd, Womack House, Swaffham Road, Ashill, Thetford, Norfolk, IP25 7DB. heather@hnbusiness.co.uk

If, at the conclusion of our complaints procedure you do not feel that we have adequately dealt with your complaint you may make a complaint directly to ICO:

<https://ico.org.uk/make-a-complaint/>

Changes to our Data Protection Policy

We keep our privacy policy under regular review and reserve the right to amend and update the policy as required. Where appropriate, we will notify you of those changes by mail, email and/or by placing an updated version of the policy on our website.