

PRIVACY NOTICE

1. PURPOSE OF THIS NOTICE

This notice describes how I collect and use personal data about you, in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act [1998 OR 2018] and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK ('Data Protection Legislation').

Please read the following carefully to understand my practices regarding your personal data and how I will treat it.

2. ABOUT ME

John Snowden ("Snowden & Co" "John Snowden Coaching", "I", "me", "my" and "mine") is a Chartered Accountant providing accountancy and tax compliance and advisory services and also coaching services. My address is Dial House, High Street, Hook Norton, Banbury, Oxfordshire OX15 5NQ.

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

I am the Data Protection Point of Contact and I am responsible for assisting with enquiries in relation to this privacy notice or my treatment of your personal data. Should you wish to contact me you can do so using the contact details noted at paragraph 12 (Contact Me), below.

3. HOW I MAY COLLECT YOUR PERSONAL DATA

I obtain personal data about you, for example, when:

- you request a proposal from me in respect of the services I provide;
- you OR your employer OR my clients engage(s) me to provide my services and also during the provision of those services;
- you contact me by email, telephone or post (for example when you have a query about my services); or
- from third parties and/or publicly available resources (for example, from your employer or from Companies House).

4. THE KIND OF INFORMATION I HOLD ABOUT YOU

The information I hold about you may include the following:

- your personal details (such as your name, address and other contact details, family relationships);
- financial information (such as but not limited to tax references and national insurance numbers, details of income from whatever source, pension contributions, assets, liabilities, transactions and capital gains/losses, VAT- and inheritance tax-related

information);

- records of meetings and conversations whether face to face, telephone or on line, and what you have communicated during these;
- details of contact I have had with you in relation to the provision, or the proposed provision, of my services;
- details of any services you have received from me;
- my correspondence and communications with you;
- information about any complaints and enquiries you make to me;
- information from research, surveys, and marketing activities;
- information I receive from other sources, such as publicly available information or information provided by your employer OR my clients.

5. HOW I USE PERSONAL DATA I HOLD ABOUT YOU

I may process your personal data for purposes necessary for the performance of my contract with you OR your employer OR my clients and to comply with my legal obligations.

I may process your personal data for the purposes necessary for the performance of my contract with my clients. This may include processing your personal data where you are an employee, subcontractor, supplier or customer of my client.

I may process your personal data for the purposes of my 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. This includes processing for marketing, business development, statistical and management purposes.

I may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Please note that I may process your personal data for more than one lawful basis depending on the specific purpose for which I am using your data.

Situations in which I will use your personal data

I may use your personal data in order to:

- carry out my obligations arising from any agreements entered into between you OR your employer OR my clients and me (which will most usually be for the provision of my services);
- carry out my obligations arising from any agreements entered into between my clients and me (which will most usually be for the provision of my services) where you may be a subcontractor, supplier or customer of my client;
- provide you with information related to my services and my events and activities that you request from me or which I feel may interest you, provided you have consented to be contacted for such purposes;

- seek your thoughts and opinions on the services I provide; and
- notify you about any changes to my services.

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

If you refuse to provide me with certain information when requested, I may not be able to perform the contract I have entered into with you. Alternatively, I may be unable to comply with my legal or regulatory obligations.

I may also process your personal data without your knowledge or consent, in accordance with this notice, where I am legally required or permitted to do so.

Data retention

I will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, I take into consideration:

- the requirements of my business and the services provided;
- any statutory or legal obligations;
- the purposes for which I originally collected the personal data;
- the lawful grounds on which I based my processing;
- the types of personal data I have collected;
- the amount and categories of your personal data; and
- whether the purpose of the processing could reasonably be fulfilled by other means.

Change of purpose

Where I need to use your personal data for another reason, other than for the purpose for which I collected it, I 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, I will notify you and communicate the legal basis which allows me to do so before starting any new processing.

6. DATA SHARING

Why might you share my personal data with third parties?

I will share your personal data with third parties where I am required to by law, where it is necessary to administer the relationship between us or where I have another legitimate interest in doing so.

Which third-party service providers process my personal data?

“Third parties” includes third-party service providers. The following activities are carried out by third-party service providers: IT and cloud services, software provision and support, professional advisory services, administration services, marketing services and banking services.

All of my third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. I only permit my third-party service providers to process your personal data for specified purposes and in accordance with my instructions.

What about other third parties?

I may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. I may also need to share your personal data with a regulator or to otherwise comply with the law.

7. TRANSFERRING PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

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

8. DATA SECURITY

I 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. In addition, I 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 my instructions and they are subject to a duty of confidentiality.

I have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where I am legally required to do so.

9. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform me of changes

It is important that the personal data I hold about you is accurate and current. Should your personal information change, please notify me of any changes of which I need to be made aware by contacting me, using the contact details below.

Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data I hold about you and to check that I am processing it lawfully.
- Request correction of the personal data that I hold about you.
- Request erasure of your personal data. This enables you to ask me to delete or remove personal data where there is no good reason for me continuing to process it. You also have the right to ask me 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 I am 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 I am processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask me to suspend the processing of personal data about you, for example if you want me 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.

If you want to exercise any of the above rights, please email me at js@snowden-co.co.uk or john@john-snowden.co.uk.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, I may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, I may refuse to comply with the request in such circumstances.

I may need to request specific information from you to help me 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.

10. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from me), you have the right to withdraw your consent for that specific processing at any time. [To withdraw your consent, please email me at js@snowden-co.co.uk or john@john-snowden.co.uk.

Once I have received notification that you have withdrawn your consent, I will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless I have another legitimate basis for doing so in law.

11. CHANGES TO THIS NOTICE

Any changes I may make to my privacy notice in the future will be updated on my web sites at www.snowden-co.co.uk and www.john-snowden.co.uk.

This privacy notice was last updated on 24 May 2018.

12. CONTACT ME

If you have any questions regarding this notice or if you would like to speak to me about the manner in which I process your personal data, please email me at js@snowden-co.co.uk or john@john-snowden.co.uk.

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

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>