**Privacy Notice**

Bessler Hendrie LLP respects your privacy and is committed to protecting your personal information. This notice will inform you how we look after your personal information and tell you about your privacy rights and how the law protects you.

Please click on the links below to take you straight to the relevant information.

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Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how we collect and process your personal information, including any information you may provide to us when you visit this website and during the course of a business relationship.

It is important that you read this notice so that you are fully aware of how and why we are using your information.

Controller

Bessler Hendrie LLP (referred to as **we**, **us** or **our** in this notice) is an audit, accountancy and tax advisory firm. For the purposes of the data protection legislation, we will typically be the data controller and therefore responsible for your personal information. However, where we act as a data processor (for example, where we provide payroll services to your employer) we will process your personal information only on the instructions of the data controller (your employer in our example) who provides us with access to your personal data, and we will meet the security and privacy requirements set out in any contract we have with the data controller.

If you have any questions about this notice, including any requests to exercise your legal rights, please contact us:

Legal entity: Bessler Hendrie LLP

Email address: privacy@besslerhendrie.co.uk

Postal address: Ashbourne House, The Guildway, Old Portsmouth Road, Guildford, Surrey GU3 1LR

Telephone number: 01483 240240

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Changes to your information

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the course of your relationship with us.

The information we collect about you

Personal information means any information about an individual from which that person can be identified. It does not include information where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

* **Identity Information** includes first name(s), maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
* **Contact Information** includes invoice address, correspondence address, email address and telephone numbers.
* **Financial Information** includes bank account and payment details.
* **Transaction Information** includes details about payments to and from you and other details of the services we have provided to you.
* **Technical Information** includes internet protocol (IP) address, your login information, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
* **Marketing and Communications Information** includes your preferences in receiving marketing information from us and your communication preferences.

If you fail to provide personal information

Where we need to collect personal information by law, or for the purposes of a contract we have with you, or are trying to enter into with you, and you fail to provide that information when requested, we may not be able to perform the services we have agreed to provide or complete a contract we are trying to enter into with you. In this case, we may have to cancel a retainer you have with us, but we will notify you if this is the case at the time.

How your personal information is collected

We use different methods to collect information from and about you including through:

* **Direct interactions.** You or your employer may give us your Identity, Contact and Financial Information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:
* make an enquiry about our services;
* ask us to provide services;
* register for access to our secure client portal;
* subscribe to our information emails or publications;
* request marketing to be sent to you; or
* give us some feedback.
* **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Information about your equipment, browsing actions and patterns. We collect this personal information by using cookies, server logs and other similar technologies.
* **Third parties or publicly available sources.** We may obtain personal information about you from various third parties and public sources as set out below:
* Technical Information from the following parties:
	+ 1. analytics providers;
		2. search information providers.
* Identity and Contact Information from publicly availably sources such as Companies House.

How we use your personal information

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

* Where you have made an enquiry about our services;
* Where we need to perform the contract we are about to enter into or have entered into with you or your employer;
* Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
* Where we need to comply with a legal or regulatory obligation.

Set out below is a description of all the ways we plan to use your personal information, and which of the legal bases we will rely on to do so. We have also identified what our legitimate interests are where appropriate.

|  |  |  |
| --- | --- | --- |
| **Purpose/Activity** | **Type of information** | **Lawful basis for processing including basis of legitimate interest** |
| To respond to an enquiry about our services you have made, whether by telephone, letter, email or via the contact us section of our website. | (a) Identity; and(b) Contact. | Necessary for our legitimate interests (to develop the services we offer and to grow our business). |
| To register you as a new client. | (a) Identity; and (b) Contact. | Performance of a contract with you. |
| To deliver services to you, including:1. Managing payments, fees and charges;
2. Seeking your thoughts and opinions on the services we provide; and
3. Collecting and recovering money owed to us.
 | (a) Identity; (b) Contact; (c) Financial; (d) Transaction; and (e) Marketing. | (a) Performance of a contract with you or your employer; and(b) Necessary for our legitimate interests (to recover debts due to us). |
| To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data). | (a) Identity;(b) Contact; and(c) Technical. | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud); and(b) Necessary to comply with a legal obligation. |
| To use data analytics to improve our website. | (a) Technical; and(b) Usage.  | Necessary for our legitimate interests (to keep our website updated and relevant, and to develop our business). |
| To make suggestions and recommendations to you about complementary services that may be of interest to you. | (a) Identity; (b) Contact;(c) Technical; (d) Usage; and (e) Profile. | Necessary for our legitimate interests (to develop our services and to grow our business). |

Marketing

You will receive marketing communications from us if you have requested information from us or purchased services from us and only where you have consented to receiving communications.

We will not share your personal information with any company for marketing purposes.

You can ask us to stop sending you marketing communications at any time by sending an email to privacy@besslerhendrie.co.uk.

Cookies

Our website uses cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our website and also allows us to make improvements to it.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

* **Strictly necessary cookies**. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to use certain areas of our website.
* **Analytical/performance cookies**. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
* **Functionality cookies**. These are used to recognise you when you return to our website. This enables us to remember your preferences.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or some parts of our website.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Disclosures of your personal information

We may have to share your personal information with the parties set out below for the purposes set out in the table above.

* Service providers acting as processors based in the UK who provide IT and accounts support services (for example, Microsoft, Quickbooks, Xero and our bookkeeping subcontractors).
* Professional advisers acting as processors or joint controllers including solicitors, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
* HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of our processing activities in certain circumstances.
* Service providers acting as processors based outside the EEA who provide IT support services.
* Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

International transfers

Most of our service providers (such as the providers of our IT and accounts support functions) are based inside the European Economic Area (**EEA**), so their processing of your personal information will not involve a transfer of information outside the EEA.

However, some of our service providers may be based outside the EEA, so their processing of your personal information may involve a transfer of information outside the EEA.

Whenever we transfer your personal information out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

* We will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information; or
* Where we use certain service providers, we may use specific contracts which give personal information the same protection it has in the UK.

Information security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Information retention

How long will you use my personal information for?

We will only retain your personal information 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.

By law we have to keep basic information about our clients (including Contact, Identity, Financial and Transaction Information) for six years after they cease being a client for regulatory and tax purposes.

Your legal rights

You have the right to:

* Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
* Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.
* Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
* Object to processing of your personal information where we are 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 ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
* Request restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information in the following situations: (a) if you want us to establish accuracy of the information; (b) where our use of the information is unlawful but you do not want us to erase it; (c) where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.
* Request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
* Withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain legal services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please send an email to privacy@besslerhendrie.co.uk.

Fees

We do not usually charge a fee for dealing with data subject access requests however, where requests are repetitive or manifestly unfounded we reserve the right to charge a commensurate fee.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Glossary

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required to by law).

**Performance of contract** means processing your information where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal information where it is necessary for compliance with a legal or regulatory obligation that we are subject to.