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 | info@digitz.uk

 | www.digitz.uk

DIGITZ LTD

PRIVACY POLICY

We understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our clients, contractors and contacts and only collect and use personal data in a way that is described here, and in a way that is consistent with our obligations of and your rights under the law.

1 INTRODUCTION

The Data Protection Act 2018 ("DPA 2018") and the General Data Protection Regulation ("GDPR") impose certain legal obligations in connection with the processing of personal data.

DIGITZ LTD is a data controller within the meaning of the GDPR and we process personal data. The firm's contact details are as listed below:

We may amend this privacy notice from time to time. If we do so, we will supply you with and/or otherwise make available to you a copy of the amended privacy notice.

Where we act as a data processor on behalf of a data controller (for example, when processing payroll), we provide an additional schedule setting out required information as part of that agreement. That additional schedule should be read in conjunction with this privacy notice.

2 INFORMATION ABOUT US.

- | | |
|---------------------------|--|
| • Company | Digitz Ltd |
| • Address | 30 The Greenway Epsom Surrey KT18 7HZ |
| • Data Protection Officer | Rebecca J Blackman |
| • Email Address | info@digitz.uk |
| • Telephone Number | 07507 785 110 |

 AAT Licensed
Accountant

Rebecca Blackman is licensed and regulated
by AAT under licence number 1005883

Director | Rebecca Blackman MAAT

Digitz Ltd.
Registered in | England and Wales.
Registered number: | 13863244
Registered address | 30 The Greenway Epsom Surrey KT18 7HZ
VAT Registration Number | 408 1225 30



3 WHAT IS INCLUDED IN THIS NOTICE

The purpose of this privacy document is to; explain how we use your personal data, how it is collected, how it is held and why it is processed. It also explains your rights under the law relating to your personal data.

4 PERSONAL DATA AND INFORMATION WE COLLECT

Personal data is defined by the UK General Data Protection Regulation (GDPR) and Data Protection Act 2018(DPA) as "Any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier".

In more simple terms, any information about you that enables you to be identified. Personal Data covers obvious information i.e., name and contact details but also information less obvious such as identification numbers or inline identifiers.

The personal details we use are listed below;

- Name
- Date of Birth
- Gender
- Marital Status
- National Insurance Number
- Address
- Email Address
- Telephone Number
- Business Name
- Job Title

5 YOUR RIGHTS

Under UK GDPR, you have the following rights, which we will always work to uphold;

- **The right to be informed about collection and use of your personal data.** Our privacy notice as detailed below should help identify all you need to know however you can always contact us to find out more information.
- **The right to access personal data we hold about you.** PART 14 in this document explains how to access this.
- **The right to have your personal data rectified.** If any of the data we hold about you is incorrect or incomplete, please contact us using the details in PART 11 of this document.

- **The Right to be Forgotten.** You have the right to ask us to dispose of any personal information we hold about you. Please contact us as mentioned in PART 12.
- **The Right to Restrict the processing of your personal data.** PART 13
- **The right to object to us using your personal data for a particular use.** for example, you may wish to “opt out” of certain marketing material. PART 13
- **Rights to automated decision making and profiling.** We do not use your information in this way.
- **The right to Data Portability.** We do not use your personal data in this way.

Further information about your rights can be obtained from the Information Commissioners Office or your local Citizens Advice Bureau.

For more information on our use of your personal data or exercising your rights as above please contact us.

If you have any cause for complaint about the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

6 THE PURPOSE FOR WHICH WE INTEND TO PROCESS PERSONAL DATA

We intend to process personal data for the following purposes;

- To enable us to supply professional services to you as our client.
- To fulfil our obligations under relevant laws in force from time to time (e.g. the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 as amended (“MLR 2017”))
- To comply with professional obligations to which we are subject as a member of Association of Accounting Technicians (AAT)
- To use in the investigation and/or defense of potential complaints, disciplinary proceedings and legal proceedings.
- To enable us to invoice you for our services and investigate/address any attendant fee disputes that may have arisen.

- To contact you about other services we provide which may be of interest to you if you have consented to us doing so.

7 THE LEGAL BASES FOR OUR INTENDED PROCESSING OF PERSONAL DATA

Our intended processing of personal data has the following legal bases.

- At the time you instructed us to act, you gave consent to our processing your personal data for the purposes listed above.
- The processing is necessary for the performance of our contract with you.
- The processing is necessary for compliance with legal obligations to which we are subject (e.g. MLR 2017).

It is a requirement of our contract with you that you provide us with the personal data that we request. If you do not provide the information that we request, we may not be able to provide professional services to you. If this is the case, we will not be able to commence acting or will need to cease to act.

8 PERSONS /ORGANISATIONS TO WHOM WE MIGHT GIVE PERSONAL DATA

We may share your personal data with:

- HMRC
- any third parties with whom you require or permit us to correspond i.e. external accountants, couriers making deliveries on our behalf
- subcontractors working on our behalf
- an alternate appointed by us in the event of incapacity or death
- tax insurance providers
- professional indemnity insurers
- our professional body The Association of Accounting Technicians and/or the Office of Professional Body Anti-Money Laundering Supervisors (OPBAS) in relation to practice assurance and/or the requirements of MLR 2017 (or any similar legislation)
- If the law allows or requires us to do so, we may share your personal data with:
 - the police and law enforcement agencies

- courts and tribunals
- the Information Commissioner's Office (ICO)

We may need to share your personal data with the third parties identified above in order to comply with our legal obligations, including our legal obligations to you. If you ask us not to share your personal data with such third parties, we may need to cease to act.

9 RETENTIONS OF PERSONAL DATA

We will not keep your personal data for longer than is necessary in light of the reasons it was collected initially. Your personal details will therefore be kept for the following time frames (or where there is no fixed period, the following factors will be used to determine how long it is kept for).

- If make an enquiry but do not engage in our services, we will keep your personal data (excluding email) for 3 months from the date of last communication.
- If you engage in our services, we will keep your personal data for a period of 7 years from the date of last communication.
- Email addresses and other contact information such as telephone numbers are kept for 36 months from the date of last communication.

Our contractual terms provide for the destruction of documents after 7 years and therefore agreement to the contractual terms is taken as agreement to the retention of records for this period, and to their destruction thereafter.

You are responsible for retaining data that we send to you, and this will be supplied in the form agreed by us.

10 REQUESTING PERSONAL DATA WE HOLS ABOUT YOU (SUBJECT ACCESS REQUEST)

You have a right to request access to your personal data that we hold. Such requests are known as 'subject access requests' ("SARs").

Please provide all SARs in writing marked for the attention of Rebecca Blackman at Digitz Ltd

To help us provide the information you want and deal with your request more quickly, you should include enough details to enable us to verify your identity and locate the relevant information. For example, you should tell us:

- your date of birth
- previous or other name(s) you have used
- your previous addresses in the past five years
- personal reference number(s) that we may have given you, for example your national insurance number, your tax reference number or your VAT registration number
- what type of information you want to know

If you do not have a national insurance number, you must send a copy of:

- the back page of your passport or a copy of your driving licence; and
- a recent utility bill.

DPA 2018 requires that we comply with a SAR promptly and in any event within one month of receipt. There are, however, some circumstances in which the law allows us to refuse to provide access to personal data in response to a SAR (e.g. if you have previously made a similar request and there has been little or no change to the data since we complied with the original request).

We will not charge you for dealing with a SAR.

You can ask someone else to request information on your behalf – for example, a friend, relative or solicitor. We must have your authority to respond to a SAR made on your behalf. You can provide such authority by signing a letter which states that you authorise the person concerned to write to us for information about you, and/or receive our reply.

Where you are a data controller and we act for you as a data processor (e.g. by processing payroll), we will assist you with SARs on the same basis as is set out above.

11 PUTTING THINGS RIGHT (THE RIGHT TO RECTIFICATION)

You have a right to obtain the rectification of any inaccurate personal data concerning you that we hold. You also have a right to have any incomplete personal data that we hold about you completed. Should you become aware that any personal data that we hold about you is inaccurate and/or incomplete, please inform us immediately so we can correct and/or complete it.

12 DELETING YOUR RECORDS (THE RIGHT TO ERASURE)

In certain circumstances you have a right to have the personal data that we hold about you erased. Further information is available on the ICO website (www.ico.org.uk). If you would like your personal data to be erased, please inform us immediately and we will consider your request. In certain circumstances we have the right to refuse to comply with a request for erasure. If applicable, we will supply you with the reasons for refusing your request.

13 THE RIGHT TO RESTRICT PROCESSING AND THE RIGHT TO OBJECT

In certain circumstances you have the right to 'block' or suppress the processing of personal data or to object to the processing of that information. Further information is available on the ICO website (www.ico.org.uk). Please inform us immediately if you want us to cease to process your information or you object to processing so that we can consider what action, if any, is appropriate.

14 OBTAINING AND REUSING PERSONAL DATA (THE RIGHT TO DATA PORTABILITY)

In certain circumstances you have the right to be provided with the personal data that we hold about you in a machine-readable format, e.g. so that the data can easily be provided to a new professional adviser. Further information is available on the ICO website (www.ico.org.uk).

The right to data portability only applies:

- to personal data an individual has provided to a controller.
- where the processing is based on the individual's consent or for the performance of a contract; and
- when processing is carried out by automated means

We will respond to any data portability requests made to us without undue delay and within one month. We may extend the period by a further two months where the request is complex, or a number of requests are received but we will inform you within one month of the receipt of the request and explain why the extension is necessary.

15 WITHDRAWAL OF CONSENT

Where you have consented to our processing of your personal data, you have the right to withdraw that consent at any time. Please inform us immediately if you wish to withdraw your consent.

Please note:

- the withdrawal of consent does not affect the lawfulness of earlier processing
- if you withdraw your consent, we may not be able to continue to provide services to you
- even if you withdraw your consent, it may remain lawful for us to process your data on another legal basis (e.g. because we have a legal obligation to continue to process your data)

16 AUTOMATED DECISION MAKING

We do not intend to use automated decision-making in relation to your personal data.

17 COMPLAINTS

If you have requested details of the information, we hold about you and you are not happy with our response, or you think we have not complied with the GDPR or DPA 2018 in some other way, you can complain to us. Please send any complaints to Rebecca Blackman

If you are not happy with our response, you have a right to lodge a complaint with the ICO (www.ico.org.uk).