



Data Privacy Policy

At T4 Tax Limited protecting your personal information is extremely important to us. It is especially important to us as our clients trust us to look after a large amount of sensitive information on everything from their business affairs to their personal financial and family details.

The way we collect and share your information is equally important. Our clients expect us to manage their information privately and securely. This policy tells you how we collect and process your personal information. Please take a few minutes to read it and show it to anyone else connected to your relationship with us.

What is personal information?

When we refer to personal information we mean information about an individual that can identify them, such as their name, address, e-mail address, telephone number and financial details. It can relate to clients, employees, shareholders, business contacts and suppliers. Any reference to "information" or "data" in this document is a reference to personal information about a living individual.

What information do we hold?

We may collect and process the following personal information about you:

Type of Data	Description	Example of how we use it
Contact	Who you are Where you live How to contact you	Providing our services generally Analysis and advice preparation Dealing with your tax returns, accounts and other accounting or compliance issues Liaising with HMRC, Companies House and other necessary third parties on your behalf Marketing
Personal Details	Age, Date of Birth Gender Family details Visual images and personal appearance Financial details Lifestyle and social circumstances	Tax related issues Accounting related issues Liaising with HMRC, Companies House and other necessary third parties on your behalf Marketing
Transactional	Bank and/or credit cards How you use and interact with the services and products we offer Assisting you in implementing the services and products we offer	General client servicing Making sure our services and products are fit for purpose
Contractual	Your interaction with us Your interaction with any authorised third parties	Adapting our services Interaction with any third parties, such as HMRC, Companies House and any other third parties to enable a smooth efficient work flow
Consent and Preferences	Authorising us to liaise with third parties, such as HMRC, Companies House, software providers etc. necessary for us to do our work for you Ways you want us to market to you	Third party relationships and contact Marketing
Technical	Details held of devices and technology we use	Cloud based software we use Desktop software we use Databases & websites we use
Open Data & Public Records	Companies House records, Electoral register Land Registry Other information that is openly available about you on the internet	General client servicing and work
Documentary Data & National records	Details about you that are stored in documents like: Your passport Driving licence Birth certificate National Insurance number UTR (Unique taxpayers reference)	Prevention of crime Money Laundering Regulations Compliance



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Where do we get our information from?

- **Information you give us directly** (when you fill in forms or contact us by phone, e-mail etc.).
- **information we collect about you or receive from other sources.**

This could be information you provide to us electronically (through our website or an online portal, for example), information we get from your online browsing activity, information from a third party or from publicly available sources such as social media platforms or the electoral register (for example, to aid in identifying you). We may also receive information if you have been dealing with another or previous agent, accountant, tax adviser or financial adviser or have been introduced to us by another company, for example a bank, existing client or your employer or financial adviser. For more information on how we use cookies and log files please refer to our cookie policy on our website.

How do we use your information?

We use personal information that we hold about you:

- To carry out our responsibilities resulting from any agreements you've entered into with us for example preparation of tax returns, accounts and other financial or administration documents necessary to do our work.
- To tell you about changes to our services and products.
- To comply with any applicable legal or regulatory requirements.
- When liaising with essential or necessary third parties such as HMRC, Companies House, the Government Gateway or any other third parties as necessary for the work we do your behalf.
- For carrying out market research, statistical analysis and customer profiling to help us improve our processes, services, products and generate new business. For example, understand digital behaviours, identify financial attitudes and develop more engaging communications.
- To provide you with marketing information about services and products offered by T4 Tax Limited or our selected third-party providers that we think you may be interested in or may benefit you. Based on your marketing preferences, we would deliver this information to you by post, telephone, email, SMS, WhatsApp or personalised online marketing via our own systems such as our own website, the T4 "client cloud" (currently DattoDrive.com), and other third-party websites such as NewsletterUpdates.com (which is operated by our sister company Corporate Ace Limited) Onedrive, Dropbox, YouTube, Twitter, Facebook and other social media platforms.
- Please note that if you choose not to receive online marketing, you will not see personalised messages using - your personal data. However, you may still see generic online advertising. We will not sell your data to third parties for them to market to you. We may also send marketing to you using our "legitimate interests", see note below for further information.
- To run our business in an efficient and proper way. This includes testing our systems and processes. Managing our financial position, business capability, planning, communications, corporate governance and general business processes.
- For any other purpose that we agree with you from time to time.



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When you apply for a service or product from us, the applicable application form, email, or telephone call you make or complete, or the resulting contact, may contain additional conditions relating to the way we use and process your personal information. These will apply in addition to the above uses.

In some cases, we may use systems to make automated or semi-automated decisions (including profiling) based on the personal information we have or collect from others. These may include:

- The prevention and detection of fraud.
- Providing quotes, calculating costs and making business decisions.
- Personalising design and content of our communications and online services.
- Determining when to provide tailored communications, for example, due to changes in personal circumstances or lifestyle.

Using your information in accordance with data protection laws

Data protection laws require us to meet certain conditions before we are allowed to use your personal information in the way we described in this privacy policy. We take these responsibilities extremely seriously and to use your personal information we will rely on the following conditions depending on the activities we are carrying out:

When we are providing our services and products to you: we will process your personal information and carry out our responsibilities based on the agreements you have entered into with us and to provide you with the information, services and products that you have requested from us or asked us to provide, which may include online services.

Complying with applicable laws: We will use or process your personal information to comply with any legal obligation that we are subject to.

Legitimate interests: To use your personal data and information for any other purpose described in this privacy policy we will rely on a condition known as "legitimate interests". It is in our legitimate interests to collect your personal data as it provides us with the information that we need to provide you with our services more efficiently and effectively. We may use your information to:

- Develop, test and manage our brands, services and products.
- Study and manage how our clients and customers use our services and products and those of our business partners.
- Carry out market research and product development which can include creating customer demographics and/or profiling. We may sometimes work with carefully selected third parties to do this, for example using advertising services provided by organisations such as Facebook and Google.
- Continue to send marketing information, via post only, to clients and customers who used a service, or requested a service or product that we offer before 25 May 2018 and did not opt-out, until such time as they have reviewed their marketing preferences which can be done at any time.
- Manage risk for us and our clients and customers.

This requires us to carry out an assessment of our interests in using your personal data against the interests you have as a citizen and the rights you have under the data protection laws.

The outcome of this assessment will determine whether we can use your personal data in ways described in this privacy policy (except in relation to marketing, where we will always rely on your consent). We will always act reasonably to give full and proper consideration to your interests in carrying out any such assessment.



Data Privacy Policy

Consent: we may provide you with marketing information about our services and products where you have provided your consent for us to do so. You may opt out of marketing at any time by emailing or telephone us or contacting us via our website.

Special category, sensitive data: Where you have consented, we will process any medical, health, racial, ethnic origin, genetic, biometric, sexual life or sexual orientation information you have provided, solely for the purposes of allowing us to provide our services and products to you.

Criminal conviction data: Where you have consented, we will process this type of information solely for the purposes of allowing us to provide our services and products to you.

Please be aware that the personal information you provide to us, and which we collect about you, is required for us to be able to provide our services and products to you and without it we may not be able to do so.

Who do we share your personal information with?

We will only disclose your information to:

- Other companies within the T4 group, third party suppliers, contractors and service providers for the purposes listed under "How we use your information" above.
- Selected third parties, so that they can contact you with the details of the services they provide, where you have expressly opted in or consented to the disclosure of your personal data for these purposes.
- Our regulators, professional bodies, government (for example HMRC), our insurers and any law enforcement or fraud prevention agencies.
- Additionally, we may disclose your personal information to third parties:
 - In such an event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business assets.
 - If we, or substantially all of our assets, are required by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
 - If you have been dealing with one of our business partners or suppliers we will provide information about you and the services and products we provide you with, where appropriate, and with other information about your dealings with us, to enable the business partner to give you informed advice.
- In order to enforce or apply the terms of any contract or agreement with you.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation or regulatory requirements or otherwise for the prevention or detection of fraud or crime.
- To protect you and T4 from financial crime we may be required to verify the identity of new and sometimes existing customers. This may be achieved by using reference agencies to search sources of information relating to you, such as an identity search. This will not affect your credit rating and if such a search fails we may need to approach you to obtain additional documentary evidence of identity.
- If you have been introduced to us by another company such as a bank, solicitor, accountancy firm or other professional we may need to share some of your information with them to enable them to:
 - Provide us with information
 - Assist you with any application process.
- If you have asked us to, or consented to, an approach by us to a bank or other third party on your behalf we will share what information is reasonably necessary to assist in the application or process.



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How long do we keep your information for?

We will keep your personal information in accordance with our internal retention policies. We will determine the length of time we keep it for based on the minimum retention periods required by law or regulation. We will keep your personal information after this period if there is a legitimate and provable business reason to do so.

Fraud Prevention

We will check your details with fraud prevention agencies. If false or inaccurate information is provided and fraud is identified details will be passed to fraud prevention agencies. Law enforcement agencies may assess and use this information. We may also share information about you with other organisations such as public bodies, including the police and we may check and/or file your details with fraud prevention agencies and databases.

We, and other organisations may also assess and use this information to prevent fraud and money laundering, for example when:

- Checking details on applications for credit and credit related or other facilities.
- Recovering debt
- Checking details of job applicants and employees.

We may also check the details of other parties related to your relationship with us including verification of identity. This includes beneficiaries, trustees, settlors, executors or administrators of your estate, parties with power of attorney and any other beneficial owner.

Transferring your data outside the EU

The data we collect from you may be transferred to, and stored at, a destination outside of the European Economic Area (EEA) to third-party suppliers, delegates or agents. We will take all reasonable steps to ensure your data is treated securely and in accordance with this privacy policy.

We will only transfer your data to a recipient outside the EEA where we are permitted to do so by law. Such as:

- a) Where the transfer is based on a standard data protection clause or clauses adopted or approved by the European Commission,
- b) Where the transfer is to a territory that is deemed adequate by the European Commission, or
- c) Where the recipient is subject to an approved certification mechanism and the personal information is subject to appropriate safeguards etc..

Sending information by email is not completely secure therefore anything you send to us by email is done so at your own risk, and any communications between us by email are accepted at your own risk.

Your rights

You have rights under data protection laws that relate to the way we process your personal data. More information about these rights can be found on the Information Commissioner's website. If you wish to exercise any of these rights please get in touch with us.



Data Privacy Policy

Your Rights

1. The right to access the personal data that we hold about you.
2. The right to make us correct any inaccurate personal data that we hold about you.
3. The right to make us raise any personal data that we hold about you. This right will only apply where, for example:
 - a. we no longer need to use the personal data to achieve the purpose it was collected for
 - b. you withdraw your consent if we are using your personal data based on that specific consent
 - c. where you object to the way we use your data and there is no overriding legitimate interest for us
4. The right to restrict our processing of the personal data we hold about you. This right will only apply where, for example:
 - a. you dispute the accuracy of the personal data we hold.
 - b. you would like your data erased but we require to hold it in order to stop it processing.
 - c. you have the right to require us to raise the personal data but would prefer that our processing is restricted instead.
 - d. Where we no longer need to use the personal data to achieve the purpose we collected it for, but you need the data for legal claims
5. The right to object to our processing of personal data we hold about you, including the purposes of sending marketing materials to you.
6. The right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to make us transfer this personal data to another organisation.
7. The right to withdraw your consent, where we are relying on it to use your personal data, for example to provide you with marketing information about our services and products.

Contacts and complaints

If you have any questions about this privacy policy or wish to exercise any of your rights, including changing your marketing preferences, please get in touch with your usual contact with our customer services team. Alternatively, you can also use the contact us section of our website.

If you have any concerns about the way we process your personal data or are not happy with the way we have handled a request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's office. Their address is:

First Contact Team
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow SK9 5AF

Data protection office

Our internal data protection officer which can be subject to change from time to time is:

Name: John Cotter

Email address: data.protection@t4tax.com

T4 Tax Limited

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