

Privacy Notice

This notice describes how we collect and use personal data about you, in accordance with the General Data Protection Regulation (GDPR) 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')

This privacy notice sets out the rights and freedoms of "data subjects", (referred to as "you" or "client") and Crossley Group (referred to as "we", "us" or "our").

This privacy notice was published 25th May 2018. It is effective upon acceptance for new clients immediately and for existing clients from 25th May 2018.

About Us

Crossley Group is a collection of businesses which includes chartered accountants, registered auditors, tax advisory and other financial (including Independent Financial advice) and employee related businesses. We are registered in England and Wales as a Partnership. Our registered office is Star House, Star Hill, Rochester, Kent, ME1 1UX.

This privacy notice is applied to any of the Crossley Group businesses, these comprise of:

- Crossley Financial Accounting Limited T/A Crossley Financial Accounting Company Registration Number 8936780 registered in England and Wales.
- Crossley Tax Limited T/A Crossley Tax Company Registration Number 7572113 registered in England and Wales.
- Crossley Payroll Limited T/A Crossley Payroll Company Registration Number 4041935 registered in England and Wales.
- Crossley Secretaries Limited T/A Crossley Secretaries Company Registration Number 4311325 registered in England and Wales.
- Fortisratio Limited T/A Crossley The Accounts Department Company Registration Number 6451415 registered in England and Wales.
- Crossley Third Sector Limited T/A Crossley Third Sector Company Registration Number 10728519 registered in England and Wales.
- Crossley Property & Lettings Limited T/A Crossley Property & Lettings Company Registration Number 10728475 registered in England and Wales.
- Crossley Business Bookkeeping and Accounting Limited T/A Crossley Business Bookkeeping and Accounting Company Registration Number 10765585 registered in England and Wales.
- Crossley Cloud Accounting Limited T/A Crossley Cloud Accounting Company Registration Number 10728452 registered in England and Wales.
- Affinity HR Services Limited T/A Crossley HR Services Company Registration Number 08971588 registered in England and Wales.
- Star Financial Solutions Limited T/A Star Financial Solutions Limited Company Registration Number 7260607 registered in England and Wales.
- Horizon Consulting Business and Management Development Limited T/A Horizon Consulting and T/A Crossley Consulting Company Registration Number 4041941 registered in England and Wales.

What is personal information?

Personal information is information relating to an identifiable natural living person. An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as name, identification numbers, location, or to one or more factors specific to physical, physiological, genetic, mental, economic, cultural or social identify of that natural person.

How we use your personal information.

We use the personal information that we collect from you to provide services and ensure you receive relevant targeted communications (advertising and marketing) We also use the information you provide to detect, prevent and mitigate fraudulent or illegal activities.

We process your personal data for purposes necessary for the performance of our contract with you and to comply with our legal obligations. We may process your personal data for the purposes of our 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.

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

If you refuse to provide us with certain information when requested, we may be unable to perform the contract we have entered into with you.

The basis we process your personal information.

When you engage us to provide you with a service you enter into a contract with us for supply of services. We use the data in order for us to perform the contract we are required to process your personal data that we collect, we will:

- Record and store your personal data in paper files and computer systems (including emails, computer hard drives and cloud hosted providers). This information can only be accessed by employees and consultants within Crossley Group businesses; and only when it is necessary to provide a service to you and to perform administration tasks associated with or incidental to that service.
- Submit your personal data to government agencies, companies house or HMRC where required to do so to fulfil either your legal and regulatory obligations or ours.
- Share your personal data with agencies, auditors or supervisory authorities where required to do so to fulfil either your legal and regulatory obligations or ours.

We do not envisage that the performance by use of our service will involve your personal data being transferred outside of the European Economic Area by us.

Your choices about how we use your personal information.

You have a right to choose how we use your personal information to communicate with you, to send you marketing information and how we use that information to provide customised and relevant marketing material.

We respect your rights to access, correct, request deletion or request restrictions of our usage of your personal information as required by applicable law. We take steps to ensure that the personal information you provide us is kept up to date. You have a right to:

- Know what personal information we maintain about you and upon request we will provide a copy of this personal information in a commonly used and machine-readable format. This is known as a Data Subject Access request and should you wish to exercise this right you should contact our Data Protection Officer as outlined at the end of this notice.
- Request that we correct, delete or complete any personal information that we maintain (details as to the extent of which we can do this will be provided at the time of such request).
- Ask us to further explain how we use your personal data.
- Object to processing of your personal information.
- Request that we delete or restrict how we use your personal information; this right may impact the services we provide you.
- Change the basis of any consent you may have provided to enable us to market to you in the future (including withdrawing any consent to market to you in its entirety).

- Request the transfer of your personal data to you or another provider or third party (if technically feasible).

How we might share your personal information.

During the course of work undertaken by us, we may disclose personal information to third parties where required to do so under the obligations of applicable law. This includes providing information to governing bodies, HMRC or pensions providers to fulfil your legal obligations. We attempt to minimise the information we disclose to what is directly relevant and necessary to accomplish the specified purpose. Under no circumstances do we sell, rent or otherwise disclose your personal information to third parties for their marketing and or advertising purposes without your explicit consent.

We may use third party provides for the following activities; IT and Cloud services, professional advisory services, administration services, marketing and banking services. All our third-party service provides are required to take commercially responsible and appropriate security measures to protect your data. Our providers are only permitted to process your personal data for specified purposes in accordance with our instructions.

How long we keep your personal information.

We retain your personal information for as long as necessary to provide the services for which you engage us, or for other essential purposes as complying with our legal obligations, resolving disputes or enforcing our rights. In most cases we retain the data for a maximum of six years but certain instances may require us to retain records indefinitely.

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

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

How do we protect your personal information?

We protect your personal information using technical and organisational security measures; in an effort to reduce the risk of loss, misuse, unauthorised access, disclosure or alteration. Some of the safe guards include the use of firewalls and data encryption, physical access controls and authentication controls. We also offer services for transferring data between both parties using secure methods and advise against sending us confidential information using unprotected means.

We 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 legally required to do so.

Personal information we collect

To provide you with your agreed engaged services, we will collect personal data that you provide us. Personal data may include but is not limited to:

- Title, names, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify your identity.
- Employment and remuneration information, (including salary, bonus schemes, overtime, sick pay, other benefits), employment history, national insurance information and other income.

- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents.
- Any investment, mortgage, finance and or insurance products and the terms and conditions relating to these.
- Accounting information including but not limited to; bank statements, receipts, invoices, cheques, bank and credit card slips/statements/information, finance agreements, employee information.
- Details of any services we provide you, along with correspondence and communication with you.
- Information received from other sources such as publicly available information.
- Information from research, surveys and marketing activities.

Exercising your rights

If you have any queries or concerns regarding our use of your data or you would like to exercise any of your rights as outlined in this notice, you should contact our designated Data Protection Officer by emailing dpo@crossley.co.uk.

Privacy Notice Updates

Further updates to this Privacy Notice will be published on this web page at www.crossley.co.uk/privacy-notice