

## Kirk Rice LLP - Privacy Notice

Kirk Rice LLP is committed to protecting and respecting your privacy.

Kirk Rice LLP is a Data Controller for the purposes of the General Data Protection Regulation (GDPR) when delivering both professional and financial services and will process your personal data in accordance with GDPR.

This Privacy Notice provides details of the personal data we collect from you, what we do with it, how you might access it and who it might be shared with. It applies to personal data provided to us, both by individuals themselves, or by third parties on behalf of individuals. Where we receive personal data from third parties that relates to an individual, we request that this third party inform the individual of the necessary information regarding the use of their data.

Where we act as a Data Processor on behalf of a Data Controller (for example, when providing Payroll Services) we provide an additional Addendum setting out required information as part of that Data Processor Agreement. That additional Addendum should be read in conjunction with this Privacy Notice.

### Our Contact Information (Data Controller)

Kirk Rice LLP  
The Courtyard  
High Street  
Ascot  
Berkshire  
SL5 7HP  
United Kingdom

Telephone: +44 (0)1344 875000  
Email: [privacy@kirkrice.co.uk](mailto:privacy@kirkrice.co.uk)  
Website: [www.kirkrice.co.uk](http://www.kirkrice.co.uk)

## Professional Services

We provide professional services such as accountancy, taxation, audit and outsourcing to individuals as well as businesses, non-profits, and other organisations (our clients). The exact data held will depend on the services to be provided to you, our client. We process personal data of our clients only for the purpose for which they are collected.

### The purposes for which we process data and the legal basis for doing so

When we process your personal data, we rely on the following (amongst others) lawful basis for doing so:

- for the performance of a contract we enter into with you, or to take steps to enter into a contract with you
- for both our and your legitimate interests
- where necessary, for compliance with a legal obligation we are subject to
- where necessary, where you have provided your consent for us to do so

Where data is processed it is used for a number of purposes such as:

- Service delivery - to enable us to supply professional services to you
- Communications, marketing and intelligence – to provide you with information about our services; to make suggestions and recommendations about services that may be of interest to you; to provide technical updates and newsletters via email; to promote the hosting and facilitating of events; to promote and develop our offerings; to ensure your marketing and communication preferences are appropriately satisfied
- Business operations – to enable us to manage and administer our business and services; to ensure client needs are appropriately satisfied; to manage client relationships; to maintain internal business records; to maintain internal operating processes
- Legal and regulatory compliance – in addition to your identity verification, we may from time to time be required to collect and process personal data in order to fulfil regulatory, legal or ethical requirements

### What data is processed?

We process the personal data of our clients, as well as the personal data of individuals associated with them; e.g. employees, directors, shareholders, customers and suppliers. This may include any relevant financial or non-financial information necessary for us to provide our services such as, names, location details, email address, telephone numbers, gender, date of birth, tax identifiers, identity data, banking details, financial details, payroll and other income details, confidential correspondence, any other specifically relevant data.

Where we process the personal data of individuals associated with you, (e.g. your employees) and, at your request we transfer their personal data outside of the EEA (e.g. International Transfer), as part of our Letter of Engagement we will require you to ensure that you have adequate safeguards in place with the recipient of that personal data, or that you have obtained the individuals explicit consent for their personal data to be transferred outside of the EEA, by us.

### Who might we share your personal data with?

To provide and improve our services, your personal data may need to be shared with, or disclosed to, service providers, electronic ID verification providers, other controllers, auditors and other professional advisers, regulatory bodies, or in some cases public authorities.

We may be mandated to disclose your personal data in response to requests from a court, police services or other regulatory bodies. Where feasible, we will consult with you prior to making such disclosure and, in order to protect your privacy, we will ensure that we will disclose only the minimum amount of your information necessary for the required purpose.

#### **How long do we retain data for?**

We will only retain personal data 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. When you cease to be a client, we continue to have statutory and regulatory obligations to retain personal data in line with legal requirements.

### **Financial Planning Services**

We provide financial planning services such as, retirement planning, investment advice and employee benefits, to individuals as well as businesses and trusts (our clients). The exact data held will depend on the services to be provided to you, our client. We process personal data of our clients only for the purpose for which they are collected.

#### **The purposes for which we process data and the legal basis for doing so**

When we process your personal data, we rely on the following (amongst others) lawful basis for doing so:

- for the performance of a contract we enter into with you, or to take steps to enter into a contract with you
- for both our and your legitimate interests
- where necessary, for compliance with a legal obligation we are subject to
- where necessary, where you have provided your consent for us to do so

Where data is processed it is used for a number of purposes such as:

- Service delivery - to enable us to supply financial planning services to you
- Communications, marketing and intelligence – to provide you with information about our services; to make suggestions and recommendations about services that may be of interest to you; to provide technical updates and newsletters via email; to promote the hosting and facilitating of events; to promote and develop our offerings; to ensure your marketing and communication preferences are appropriately satisfied
- Business operations – to enable us to manage and administer our business and services; to ensure client needs are appropriately satisfied; to manage client relationships; to maintain internal business records; to maintain internal operating processes
- Legal and regulatory compliance – in addition to your identity verification, we may from time to time be required to collect and process personal data in order to fulfil regulatory, legal or ethical requirements

#### **What data is processed?**

We process the personal data of our clients, as well as the personal data of individuals associated with them; e.g. employees, directors, shareholders, family members. This may include any relevant financial or non-financial information necessary for us to provide our services such as, names, location details, email address, telephone numbers, gender, date of birth, tax identifiers, identity data, banking details, financial details, payroll and other income details, investments and other financial interests, credit history and credit checks, employment history, confidential correspondence any other specifically relevant data.

Where we process special categories of personal data, such as health data, we would request explicit consent from you.

Where we process the personal data of individuals associated with you, (e.g. your employees) and, at your request we transfer their personal data outside of the EEA (e.g. International Transfer), as part of our Letter of Engagement we will require you to ensure that you have adequate safeguards in place with the recipient of that personal data, or that you have obtained the individuals explicit consent for their personal data to be transferred outside of the EEA, by us.

#### **Who might we share your personal data with?**

To provide and improve our services, your personal data may need to be shared with, or disclosed to, financial institutions who can assist in the provision of financial services to you, including product providers, lenders, banks, insurers, fund managers, platform providers as well as electronic ID verification providers, other controllers, auditors and other professional advisers, regulatory bodies, or in some cases public authorities.

We may be mandated to disclose your personal data in response to requests from a court, police services or other regulatory bodies. Where feasible, we will consult with you prior to making such disclosure and, in order to protect your privacy, we will ensure that we will disclose only the minimum amount of your information necessary for the required purpose.

#### **How long do we retain data for?**

We will only retain personal data 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. When you cease to be a client, we continue to have statutory and regulatory obligations to retain personal data in line with legal requirements. Where we retain special categories of personal data we will do so until consent is withdrawn.

### **Marketing and Business Development (including Prospective Clients)**

Personal data may be collected when you correspond with us by telephone, email or when you have opted into marketing communications. We process personal data only for the purpose for which they are collected.

### **The purposes for which we process data and the legal basis for doing so**

When we process your personal data, we rely on the following (amongst others) lawful basis for doing so:

- for both our and your legitimate interests
- where necessary, where you have provided your consent for us to do so

Where data is processed it is used for a number of purposes such as:

- Communications, marketing and intelligence – to provide you with information about our services; to make suggestions and recommendations about services that may be of interest to you; to provide technical updates and newsletters via email; to promote the hosting and facilitating of events; to promote and develop our offerings; to ensure your marketing and communication preferences are appropriately satisfied

### **What data is processed?**

We process the personal data of individuals, businesses, trusts, non-profits, and other organisations as well as the personal data of individuals associated with them. This may include any relevant financial or non-financial information necessary for us to service your enquiry such as, names, location details, email address and telephone numbers; this data is held within our CRM tool.

### **Who might we share your personal data with?**

Where personal data is processed for marketing and business development purposes we do not ordinarily share this data. Where there may be a requirement to do so, we would request explicit consent from you.

### **How long do we retain data for?**

We will only retain personal data until your consent is withdrawn. We include an 'unsubscribe' facility in every marketing communication.

## **Online Visitors (users of our Website & Mobile Applications)**

When Online Visitors use our website or mobile applications, we may collect and process personal data about them automatically, or through interaction with online forms such as, making an enquiry, asking a question, requesting an appointment or requesting key guides. We process personal data only for the purpose for which they are collected.

### **The purposes for which we process data and the legal basis for doing so**

When we process your personal data, we rely on the following (amongst others) lawful basis for doing so:

- for both our and your legitimate interests
- where necessary, where you have provided your consent for us to do so

Where data is processed it is used for a number of purposes such as:

- Communications, marketing and intelligence – to respond to an enquiry submitted via our online contact forms; to allow Online Visitors to participate in the interactive features of our website or mobile application (when they choose to do so); by using Google Analytics to analyse our website usage; to improve our website experience; to create reports for internal use

Online Visitors to our website or mobile application often fall into another category listed in this Privacy Notice; for example, existing clients, prospective clients or job applicants; therefore data may be held and processed for another purpose.

### **What data is processed?**

The data we hold is dependent on the data that was entered or collected, by what means it was entered or collected, and for what purpose.

Where personal data is entered by you, this may include any relevant financial or non-financial information necessary for us to service your enquiry such as, names, location details, email address and telephone numbers; this data is held within our CRM tool.

Where data is collected automatically, this may include technical data about your visit to our website or mobile application, including where available your Internet Protocol (IP) address, your browser type, pages viewed and analytic data collected via Google Analytics and 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 improve it. For detailed information on the Cookies we use and the purposes for which we use them, see our Cookie Policy within our [Terms of Use](#).

Online Services may, from time to time, contain links to and from the websites of third parties. Please note that if you follow a link to any of these websites, such websites will apply different terms for the collection and privacy of your personal data and we do not accept any responsibility or liability for these third party websites.

## Who might we share your personal data with?

Where personal data is processed for online purposes your personal data may need to be shared with, or disclosed to, our service providers. Data collected automatically is statistical data about our users' browsing actions and patterns, and does not identify any individual.

## How long do we retain data for?

We retain the personal data processed by us in a live environment for as long as necessary to fulfil the purposes we collected it for. We include an 'unsubscribe' facility in every marketing communication.

## Recruitment

Personal data may be collected directly from a job applicant, or indirectly via a recruitment agency, when you or they correspond with us by telephone, email or online. We process personal data only for the purpose for which they are collected.

### The purposes for which we process data and the legal basis for doing so

When we process your personal data, we rely on the following (amongst others) lawful basis for doing so:

- for the performance of a contract we enter into with you, or to take steps to enter into a contract with you
- for both our and your legitimate interests
- where necessary, for compliance with a legal obligation we are subject to
- where necessary, where you have provided your consent for us to do so
- where a third party, such as a recruitment agency, passes your personal data to us, we rely on that third party having obtained your consent to do so

Where data is processed it is used for a number of purposes such as:

- Business operations – to manage our recruitment process; to enable us to assess and confirm an applicant's suitability for employment
- Legal and regulatory compliance – we may need to process data in order to fulfil our legal obligations; for example, we are required to check a successful applicant's eligibility to work in the UK before employment starts

### What data is processed?

We process the personal data of individuals. This may include your name, location details, email address, telephone number, gender, date of birth, employment history, qualifications, skills and experience, current remuneration and benefits, nationality and entitlement to work in the UK.

## Who might we share your personal data with?

Where data is processed for recruitment purposes we do not ordinarily share this data. Where there may be a requirement to do so, we would request explicit consent from you.

## How long do we retain data for?

If the application for employment is unsuccessful, we will hold the personal data on file for six months after the end of the relevant recruitment process.

If the application for employment is successful, personal data gathered during the recruitment process will be transferred to the applicant's personnel file and retained during their employment. The period for which the personal data will be held will be provided to the applicant in a new Privacy Notice.

## Suppliers

We collect and process personal data about our suppliers, subcontractors, and the individuals associated with them. We process personal data only for the purpose for which they are collected.

### The purposes for which we process data and the legal basis for doing so

When we process your personal data, we rely on the following (amongst others) lawful basis for doing so:

- for the performance of a contract we enter into with you, or to take steps to enter into a contract with you
- for both our and your legitimate interests
- where necessary, for compliance with a legal obligation we are subject to

Where data is processed it is used for a number of purposes such as:

- Service delivery – where a supplier is helping us to deliver professional and financial services to our clients, we process personal data about the individuals involved in providing the services
- Business operations - to manage our relationship; to receive goods and services from the supplier; to maintain internal business records; to maintain internal operating processes
- Legal and regulatory compliance – we may need to process data in order to fulfil our legal obligations

### What data is processed?

We process the personal data necessary for the purposes listed above. This may include, names, location details, email address, telephone numbers and banking details.

### Who might we share your personal data with?

Where supplier data is processed, personal data may need to be shared with, or disclosed to our clients, where a supplier is helping us to deliver professional and financial services to them.

### How long do we retain data for?

We will only retain personal data 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.

## International Transfers of Personal Data

Your personal data may be transferred to and stored outside the country where you are located. This includes countries outside the European Economic Area (EEA), and countries that do not have laws that provide specific protection for personal information.

Where we collect your personal data within the EEA, transfer outside the EEA will only be where we have ensured a similar degree of protection for your personal information, by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission
- where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe
- where we use providers based in the United States, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and USA

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

## How do we look after Personal Data?

We have implemented appropriate physical, technical and organisational measures designed to, restrict, secure and control all of our information assets against unauthorised access, damage, loss or destruction; whether physical or electronic.

In addition, we limit access to personal data to those employees, agents, contractors and other third parties that have a legitimate business need for such access.

We limit the amount of personal data collected only to what is fit for the purpose, as described within this Privacy Notice.

We retain personal data only for as long as is described within this Privacy Notice, to respond to your requests, or longer if required by law. While in our possession, together with your assistance, we try to maintain the accuracy of your personal data.

## How can you access your Personal Data?

You have the right to request access to any of your personal data we may hold. If any of that information is incorrect, you may request that we correct it. If we are improperly using your information, you may request that we stop using it or even delete it completely.

If you would like to make a request to see what personal data of yours we might hold, you may make a request to [privacy@kirkrice.co.uk](mailto:privacy@kirkrice.co.uk).

You also have the right to request that we port or transfer your personal data to a different service provider, or to yourself, if you so wish.

Where it may have been necessary to get your consent to use your personal data, you have the right to withdraw that consent. If you withdraw your consent, we will cease using your personal data without affecting the lawfulness of processing based on consent before your withdrawal.

## Our Supervisory Authority

You have the right to lodge a complaint with any Supervisory Authority. See our Supervisory Authority contact details below:

Information Commissioners Office (ICO)  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
United Kingdom

Telephone: +44 (0)303 123 1113  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)  
Website: [www.ico.org.uk](http://www.ico.org.uk)