

M^cKie & Co Privacy Policy

1 Introduction

- 1.1 Please take the time to read this Policy, which contains important information about the way in which we process personal data.
- 1.2 M^cKie & Co (Advisory Services) LLP is committed to respecting and protecting your privacy. We shall take all reasonable steps to ensure your personal data is protected against unauthorised access, it will not be sold or disclosed (other than as specified under this notice) to another company or organisation. The only time we shall disclose your personal data is when we are legally required to do so or as required by our regulators.
- 1.3 This Privacy Policy (the “Policy”) explains how we shall collect, store and use any personal data you provide via our website, email or networking with our people and when you otherwise communicate with us (including in the course of the tax advisory services we provide or the running of our business).
- 1.4 Our details are as follows:
Data controller: M^cKie & Co (Advisory Services) LLP, Rudge Hill House, Rudge, Somerset, BA11 2QG
ICO registration number: Z7402500
- 1.5 This Policy may change from time to time and if it does, the current version will be available on our website and becomes effective immediately.

2 Information we may collect about you

- 2.1 We may collect and process information about you and your personnel through various means, including:
- in the course of providing advice to you (or your business). We will usually act as a data controller in this capacity;
 - via our website (e.g. on our ‘Contact Us’ page) etc;
 - by email or other electronic correspondence;
 - by telephone;

- networking (e.g. at conferences, events and/or other meetings or events attended by us);
- otherwise through providing our tax advisory services or operating our business.

2.2 The sort of personal data you might give to us might include:

- your name and title;
- contact information, including telephone number, postal address and email address;
- employment and job application details, e.g. date of birth, employment history and qualifications;
- photographic identification;
- in certain circumstances, your and others' signature(s), National Insurance number(s) and financial details such as bank account details;
- in certain circumstances, data relating to health (including disabilities), ethnicity, race, religious beliefs and other 'special category personal data';
- the content of any enquiry submitted over our website;
- any other personal data we collect in the context of our work for our clients or in the course of operating our business.

2.3 If you contact us, we may keep a record of that correspondence.

2.4 The personal data described above may relate to any of the following categories of person:

- our clients and our clients' personnel;
- our prospective employees or other job applicants;
- those emergency contacts whose details have been provided to us by our employees;
- third parties with whom we have contact by virtue of providing tax advisory services;
- our contacts at other professional advisors or others with whom we work in the context of our tax advisory services;
- our prospective target clients;
- our contractors and suppliers;

- those who submit enquiries through our website or whose details are otherwise entered into our client management system;
- any other visitor to our offices.

3 Cookie Policy

3.1 Our website uses cookies to distinguish you from other users, to improve your experience on our website, and, to recommend content that may be of interest to you. For full details on how we use cookies, please see our [Cookie Policy](#).

4 How we shall use your information

4.1 We may use your information for the following purposes:

- a) to respond to a query that you submit to us;
- b) to manage our relationship with you (and/or your business), including by maintaining our database of clients and other third parties for administration, and accounting and relationship management purposes;
- c) to complete our contractual obligations to you, or otherwise to take steps as described in our engagement agreement (including any associated administration);
- d) to carry out any relevant conflict of interest checks, anti-money laundering and sanctions checks and fulfilling our obligations under any relevant anti-money laundering law or regulation (including under The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017);
- e) to verify your identity using electronic verification. Any personal data received from you for the specific purpose of proving your identity will be processed only for the purposes of preventing money laundering or terrorist financing (as detailed above), unless any additional use is permitted by law or you consent to us using it for a different purpose;
- f) to send you any relevant information on our services and events that may be of interest to you using the email and/or postal address which you have provided, but only if you have given us your consent to do so or we are otherwise able to do so in accordance with applicable Data Protection Legislation;
- g) to ensure that our website's content is presented in the most effective manner for you and your device;
- h) to administer and manage our website;
- i) as part of our efforts to keep our website safe and secure;

- j) to measure or understand the effectiveness of advertising we send to you and others, and to deliver relevant advertising to you;
- k) to ensure we appropriately administer any attendance or visits to our offices;
- l) to comply with any other professional and regulatory obligations which apply to us or policies that we have in place;
- m) as we feel is necessary to prevent illegal activity or to protect our interests.

5 Legal grounds for processing your information

5.1 We shall rely on the following legal bases for processing your personal data:

- a) **In respect of our performance of a contract.** The personal data that we are required to collect in order to comply with any professional, legal and regulatory obligations which apply to us must be provided to us in order for us to perform a contract. We should not be able to act for you without this personal data;
- b) **To comply with any legal and regulatory obligation to which we are subject;**
- c) **Where we have a legitimate interest, in the provision of our advice and in the effective delivery of that advice** (and where our legitimate interests are not overridden by your (or the relevant individual's) own interests or fundamental rights or freedoms). These legitimate interests will include our interests in managing our relationship with our clients and achieving compliance with policies, practices or procedures;
- d) **Where processing of 'special category data' is necessary in the context of the establishment, exercise or defence of legal claims.**

5.2 Generally we do not rely on consent as a legal basis for processing your personal data, other than in relation to sending third party direct marketing communications to individuals via email. You have the right to withdraw consent to marketing at any time by contacting us at enquiries@mckieandco.com.

6 Sharing your information

6.1 We may share your details with carefully selected third parties. These may include those who provide services to us and may include organisations that help us to market our services and third parties instructed to enable us to fulfil our contractual obligations to you and, or, our clients in the course of business.

- 6.2 We may disclose your information to third parties when:
- you specifically request this or it is necessary in order for us to provide our advisory services to you; for example, when we need to instruct lawyers in another jurisdiction to provide advice which you have requested;
 - if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to protect the rights or property of ourselves, our clients, or others and the security of our website.

- 6.3 The third parties include:
- our insurers;
 - other professional advisors or third parties including counsel, overseas lawyers or accountants with whom we engage as part of our work for our clients or who our clients separately engage in the same context;
 - the professional bodies of which our partners are members or with which we are registered, including the Chartered Institute of Taxation, the Society of Trust and Estate Practitioners and the Institute of Chartered Accountants in England and Wales;
 - HM Revenue & Customs;
 - our data processors providing security, email security, data governance, archiving and other IT and business support services;
 - our email marketing platform provider and our website platform provider;
 - analytics and search engine providers that assist us in the improvement and optimisation of our website;
 - any third party you ask us to share your data with.

6.4 Where we are legally required to obtain your explicit consent to provide you with marketing material, we shall only provide you with such marketing materials if you have provided consent for us to do so.

6.5 Our website may, from time to time, contain links to and from the websites of other organisations. If you follow a link to any of those websites, please note that those websites have their own privacy policies and that we do not accept any responsibility or liability for those policies. Please check those policies before you submit any personal data to those websites.

7 Storage and retention of your personal data

- 7.1 We follow strict security procedures as to how your personal information is stored and used. Once we have received your information, we shall use strict procedures and security features to try to prevent unauthorised access. Unfortunately, the transmission of information via the internet is not completely secure and although we do our best to protect your personal data, we cannot absolutely guarantee the security of your data.
- 7.2 We shall keep your information stored on our systems for as long as it takes to provide the services to you which you have engaged and shall do so in accordance with our Engagement Letter. We may keep your data for longer than our stated retention period of ten years from the date the advice is given if we are unable to delete it for legal, regulatory or technical reasons. We may also keep it in order to prevent conflicts of interests. If we do, we shall ensure that appropriate safeguards are in place to protect your privacy and that the data is only used for those purposes.
- 7.3 We keep contact information (such as mailing list information) until a recipient unsubscribes or requests that we delete that information. If you choose to unsubscribe from a mailing list, we may keep certain limited information about you so that we may honour your request.
- 7.4 We shall, subject to paragraph 7.2, not store your information for longer than is reasonably necessary or required by law.

8 Withdrawal of consent

- 8.1 Where we process your personal data we do so on the basis that you have provided your consent for us to do so for the purposes set out in this Policy when you submitted your personal data to us. You may withdraw your consent to this processing at any time by contacting us at enquiries@mckieandco.com or via the web form on our [Contact Us](#) page.
- 8.2 It should be noted that:-
- 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.

- 8.3 If you do withdraw your consent, we may still be able to process some of the data that you have provided to us on other grounds and we shall notify you of those grounds at such time.

9 Your information rights

- 9.1 Data Protection legislation gives you the right to access information held about you. You are entitled to be told by us whether we or someone else on our behalf is processing your personal information; what personal information we hold, details of the purposes of our processing of your personal information and details of any third party with whom your personal information has been shared.
- 9.2 You can access the personal information we hold on you by writing to us at: FAO: Data Protection Officer, M^cKie & Co (Advisory Services) LLP, Rudge Hill House, Rudge, Somerset, BA11 2QG. You can also contact us by email at enquiries@mckieandco.com or by completing our web form via our [Contact Us](#) page.
- 9.3 We shall ask you to provide proof of identity before we show you your personal information – this is so that we can prevent unauthorised access to it.
- 9.4 You are entitled to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format, and to transmit that data to another data controller. You can exercise this right by contacting us at enquiries@mckieandco.com or by completing our web form via our [Contact Us](#) page.
- 9.5 In the event that an access request is unfounded, excessive or especially repetitive, we may refuse to comply with the request.
- 9.6 You have the additional rights to request rectification and erasure of your personal data and to request restriction of, and to otherwise object to, our processing of your personal data and you can exercise these rights at any time by contacting enquiries@mckieandco.com or by completing our web form via our [Contact Us](#) page. In certain circumstances we have the right to refuse to comply with a request for erasure. If applicable we shall supply you with the reasons for refusing your request.

10 Complaints

- 10.1 If you consent to us contacting you, we shall always aim to be respectful and only to send relevant and appropriate material to you. If at any time you do not think that we have complied with this, please contact us straight away to let us know.
- 10.2 You also have the right to make a complaint to the Information Commissioner's Office. For more details please visit the [ICO](#) website.

11 Contact

Questions, comments and requests regarding this Policy should be addressed to:

Name: Simon M^cKie

Address: Rudge Hill House, Rudge, Somerset, BA11 2QG

Email address: simonmckie@mckieandco.com

Telephone number: 01373 830956

Alternatively you can contact us through the [Contact Us](#) section of our website.