

LEGAL AND REGULATORY INFORMATION

Clarke + Wells is the trading name of Astute Business Consultancy Limited, a Private Limited Company incorporated in England and Wales registered in England under company number 04215835.

Registered address: 99 Western Road, Lewes, BN7 1RS

In accordance with the disclosure requirements of the Provision of Services Regulations 2009, our professional indemnity insurer is QBE, of 30 Fenchurch Street, London EC3M 3BD. The territorial coverage is worldwide excluding professional business carried out from an office in the United States of America or Canada and excludes any action for a claim brought in any court in the United States of America or Canada.

The firm is subject to ICAEW Code of Ethics which can be found at www.icaew.com/regulations.

PRIVACY NOTICE

1. ABOUT US AND THE PURPOSE OF THIS NOTICE

Clarke + Wells / Astute Business Consultancy Limited, registered in England under company number 04215835.

Registered address: 99 Western Road, Lewes, BN7 1RS

Contact: Caroline Clarke

Email address: caroline@clarkewells.co.uk

Phone: 01273 961334

If you have any questions about this Notice or the way we treat your data then you should contact Caroline Clarke using the details above.

This notice will tell you how we look after your personal data, about your privacy rights, and about our compliance with and your protections under Data Protection Legislation.

In this notice "Data Protection Legislation" means any applicable law relating to the processing, privacy, and use of Personal Data, including the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended by The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020.

For the purpose of the Data Protection Legislation and this notice, we are the 'data controller'. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

We have appointed a Data Protection Officer. Our Data Protection Officer is our Data Protection Point of Contact and is responsible for assisting with enquiries in relation to this privacy notice or our treatment of your personal

data. Should you wish to contact our Data Protection Point of Contact you can do so using the contact details noted at paragraph 11(Contact Us), below.

2. THE KIND OF INFORMATION WE HOLD ABOUT YOU

The information we hold about you may include the following:

- your personal details (such as your name and/or address);
- details of contact we have had with you in relation to the provision, or the proposed provision, of our services;
- details of any services you have received from us;
- our correspondence and communications with you;
- information about any complaints and enquiries you make to us;
- Business name or Profession;
- Bank details;
- Tax identification number;
- National Insurance number;
- Copy of identity documents, such as passport, driving licence, utility bills.
- Access to electronic accounting records

3. HOW WE MAY COLLECT YOUR PERSONAL DATA

We obtain your personal data directly from you when:

- you request a proposal from us in respect of the services we provide;
- you engage us to provide our services and also during the provision of those services;
- you contact us by email, telephone, post or social media (for example when you have a query about our services);

We may also obtain your personal data indirectly:

- from our client when it engages us to provide services and also during the provision of those services
- from third parties and/or publicly available resources (for example, from your employer, from Companies House, HMRC)

4. HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU

We may process your personal data for purposes necessary for the performance of our contract with you and to comply with our legal obligations. This may include processing your personal data where you are an employee, subcontractor, supplier or customer of our client.

We may also 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.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

Situations in which we will use your personal data

We may use your personal data in order to:

- carry out our obligations arising from any agreements entered into between you and us (which will most usually be for the provision of our services);
- provide you with information related to our services and our events or seek your thoughts and opinions on the services we provide; and
- notify you about any changes to our services.

In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

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.

Data retention

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration the requirements of our business and the services provided, any statutory or legal obligations and the purposes for which we originally collected the personal data.

Change of purpose

Where we need to use your personal data for a reason, other than the purpose for which we originally collected it, we will only use your personal data where that reason is compatible with the original purpose. If we need to use your data for a new purpose, we will notify you and communicate our legal basis for this new processing.

5. DATA SHARING

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us, or where we have another legitimate interest in doing so. This may include sharing your personal data with a regulator or to otherwise comply with the law.

“Third parties” includes third-party service providers. The following activities are carried out by third-party service providers: IT and cloud services. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions

We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also

need to share your personal data with a regulator or to otherwise comply with the law.

6. TRANSFERRING PERSONAL DATA OUTSIDE THE UNITED KINGDOM (UK)

We will not transfer the personal data we collect about you outside of the UK.

7. DATA SECURITY

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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 we are legally required to do so.

8. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data

controller if the processing is based on consent, carried out by automated means and this is technically feasible.

If you want to exercise any of the above rights, please email our Data Protection Point of Contact - caroline@clarkewells.co.uk

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee for the administrative costs of complying with the request if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

9. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email our Data Protection Point of Contact: caroline@clarkewells.co.uk

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

10. CHANGES TO THIS NOTICE

Any changes we may make to our privacy notice in the future will be made available via the website www.clarkewells.co.uk. This privacy notice was last updated on 1st July 2022.

11. CONTACT US

If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please email our Data Protection Point of Contact Caroline Clarke - caroline@clarkewells.co.uk

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone - 0303 123 1113 (local rate) or 01625 545 745
Website - <https://ico.org.uk/concerns>