

Hollis Accounting Limited's External Privacy Statement

Who we are

This is the privacy statement of Hollis Accounting Limited, a company registered in Scotland (Reg no: SC354705) and a firm of Chartered Accountants registered with the Institute of Chartered Accountants in Scotland.

This privacy statement explains how we collect and use personal information about you.

What personal information we collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you as follows:

- **Identity Data** includes, in relation to you or a family member, first name, maiden name, last name, username or similar identifier; marital status; title; date of birth; gender; data contained on a passport, photocard driving licence or other identity card; and data contained in photographs.
- **Contact Data** includes home address and billing address (if different), email address and telephone numbers.
- **Financial Data** includes income, personal expenditure, charitable donations, taxation and other financial-related details; investments and other financial interests; bank account and payment card details; pension details; and data relating to the membership of professional bodies.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

We may collect special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We may also collect information about criminal convictions and offences.

Where we collect personal information from

You may give us your Identity, Contact and Financial Data by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you engage our services, during our work for you and when you approach us to provide a quotation for services.

Other data controllers (including clients) may also provide your personal data to us.

How we use your personal information

We will only use your personal data where the law allows us to, including in the following circumstances:

- *deliver services and meet legal responsibilities*
- *verify identity where this is required*
- *communication by post, email or telephone*
- *understand needs and how they may be met*
- *maintain records*
- *process financial transactions*
- *prevent and detect crime, fraud or corruption*

Who we share your personal information with

We do not sell, distribute or otherwise make personal data commercially available to any party, except as described in this policy or with your prior permission.

We may have to share your personal data with:

- *Our regulators, the government or another regulatory body*

- *Third party service providers*
- *Another third party if our client lawfully instructs us to do so, such as funders/auditors or other professionals.*
- *The owners of our clients, including shareholders*

If you do not provide your personal information

We may not be able to complete our services for you if you do not provide appropriate information to enable us to engage with you or complete the agreed work.

How long we retain your personal information for

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, regulatory or reporting requirements. To determine the appropriate retention period for personal data, we consider:

- *the amount, nature, and sensitivity of the data;*
- *the potential risk of harm from unauthorised use or disclosure of the data;*
- *the purposes for which we process the data; and*
- *the applicable legal requirements.*

Holding personal information outside the EEA

Personal information is mostly processed by Hollis Accounting Ltd's staff at our office(s) in the UK. To allow us to operate efficient digital processes, we sometimes need to store information in servers located outside the UK, both within the European Economic Area (EEA) and outside the EEA (when outside EEA this is primarily in the USA). Where we need to transfer information outside the EEA we will take all reasonable steps to ensure that your personal information is properly protected primarily through the use of market leading 3rd party service providers committed to GDPR compliance, examples of such providers include Microsoft, Google, Dropbox & Xero.

We back up our electronic files using a provider offsite. This is to ensure we are able to recover data should our onsite system fail. The company we use for this service holds data securely in the United States of America.

Using our website

We do not record individually identifiable information on website users.

Your rights

Access to your information – You have the right to request a copy of the personal information about you that we hold.

Correcting your information – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

Deletion of your information – You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained.
- We are using that information with your consent and you have withdrawn your consent – see *Withdrawing consent to using your information* below.
- You have validly objected to our use of your personal information – see *Objecting to how we may use your information* below.
- Our use of your personal information is contrary to law or our other legal obligations.

Objecting to how we may use your information – You have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

Restricting how we may use your information – In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where this is no longer a basis for using your personal information but you don't want us to delete the data. Where this right to validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Automated processing – If we use your personal information on an automated basis to make decisions which significantly affect you, you have the right to ask that the decision be reviewed by an individual to whom you may make representations and contest the decision. This right only applies where we use your information with your consent or as part of a contractual relationship with you.

Withdrawing consent using your information – Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

Please contact us in any of the ways set out in the *Contact information and further advice* section if you wish to exercise any of these rights.

Changes to our privacy statement

We keep this privacy statement under regular review and will place any updates on this website. Paper copies of the privacy statement may also be obtained by writing to Sarah Hollis, Hollis Accounting Limited, 3 Melville Crescent, Edinburgh, EH3 7HW with a stamped self-addressed envelope.

This privacy statement was last updated on 29 May 2018.

Contact information and further advice

Should you have any queries or to exercise any of the above rights please contact our Privacy Officer at: Sarah@hollisaccounting.co.uk, by phone on 0131 225 2821, or by post at Hollis Accounting Limited, 3 Melville Crescent, Edinburgh, EH3 7HW.

Complaints

We seek to resolve directly all complaints about how we handle personal information but you also have the right to lodge a complaint with the Information Commissioner's Office, whose 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>