

## Template External Privacy Statement

### Who we are

This is the privacy statement of Key Professional Partnership Ltd, a Chartered Accountancy Practice Regulated by the Institute of Chartered Accountants of Scotland – [www.ICAS.com](http://www.ICAS.com)

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

### What personal information we collect

- Names
- Addresses
- Date of Birth
- Email addresses
- Bank details
- National Insurance Numbers
- UTR Numbers
- VAT Numbers
- Photographic Identification
- Pay Details
- Tax and Earnings Details
- Mortgage details
- Any other information required to carry out our duties in a professional capacity

### Where we collect personal information from

We collect personal information from that provided by the individual to us, from publicly available sources such as Companies House. We also collect Data from HMRC and Credit Checking Agencies.

### How we use your personal information

- *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 share the information unless authorised to do so by the individual, such as to HMRC or Mortgage Advisers.

We outsource our marketing to Pelo Marketing (Pelo Scotland Ltd SC438613) who are a registered data controller with the ICO (registration number: ZA323554). We use a third party online email marketing application, Mailchimp, who are committed to the protection of your data and comply with the GDPR

### *How long we retain your personal information for*

**We retain your information for the length of your engagement with us and up to 7 years post disengagement.**

### 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 is 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.

This privacy statement was last updated on 19<sup>th</sup> April 2018

### **Contact information and further advice**

Key Professional Partnership Ltd

Ingram House

227 Ingram Street

Glasgow

G1 1DA

### **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>