



## **ANDERSONBAIN PRIVACY NOTICE**

This privacy notice describes how andersonbain LLP (“we”, “us”, “the firm”) collect and use personal information about you while we provide services to you and afterwards, in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, you can be assured that it will be used only in accordance with this privacy policy.

This policy will explain areas of this website that may affect your privacy and personal details, how we process, collect, manage and store those details and how your rights under the GDPR (General Data Protection Regulation), the DPA (Data Protection Act) [pre GDPR enforcement] and the PECR (Privacy and Electronic Communications Regulations) are adhered to.

We are a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are legally required to notify you of the information contained in this privacy notice. This notice does not form part of our letter of engagement to provide our services. We may update this notice at any time.

## **DATA PROTECTION PRINCIPLES**

To comply with data protection law, the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## **THE KIND OF INFORMATION WE HOLD ABOUT YOU**

Personal data, or personal information, means any information about you from which you can be identified. There are also “special categories” of more sensitive personal data, which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Information to enable us to verify your identity, including copies of photographic identification and your date of birth
- Marital status and dependants
- Where necessary, details about your personal finances including your bank account details

## **HOW WE WILL USE THE INFORMATION ABOUT YOU**

We will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
4. In relation to “special categories” of particularly sensitive information, for example about your health and criminal convictions, with your consent, or, where you are not capable of giving your consent but it is necessary for us to use the information to protect your interests.
5. Where we need to protect your interests (or someone else’s interests).
6. Where it is needed in the public interest or for official purposes.
7. Internal record keeping.
8. We may use the information to improve our services.
9. Where we have clearly stated and made you aware of the fact, and where you have given your express permission, except for where we have legitimate interests in doing so, we may use your details to send you information related to our services/products through a mailing list system. This is done in accordance with the regulations named above.

We will only use your personal information for the purposes for which we collected it and reasons that are compatible with that purpose.

## **DATA SHARING, DATA SECURITY AND DATA RETENTION**

We may have to share your data with third parties, including other professionals involved in our work for you, our regulators where necessary and IT service providers. We do not allow our third-party service providers to use your personal data for their own purposes. We require third parties to respect the security of your data and to treat it in accordance with the law.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Details of these measures are available on request. We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information 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 this where we are legally required to do so.

We will only retain your personal information 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. Details are available on request.

## USE OF COOKIES

This website uses cookies to better understand the users' experience while visiting the website. Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server, to provide the users with a tailored experience within this website.

Users are advised that if they wish to deny the use and saving of cookies from this website onto their computer's hard drive they should take necessary steps within their web browser's security settings to block all cookies from this website and its external serving vendors or use the cookie control system if available upon their first visit.

## MEASURING WEBSITE USAGE (GOOGLE ANALYTICS)

We use Google Analytics software to collect information about how you use this website. We do this to help make sure the site is meeting the needs of its users and to help us make improvements.

Google Analytics stores information about:

- the pages you visit
- how long you spend on each page
- how you got to the site
- what you click on while you're visiting the site

We don't collect or store your personal information (for example your name or address) so this information can't be used to identify who you are. We don't allow Google to use or share our analytics data.

Google Analytics sets the following cookies in accordance with [Google's privacy policy](#):-

## UNIVERSAL ANALYTICS

Name	Purpose	Expires
_ga	This helps us count how many people visit the site by tracking if you've visited before	2 years
_gid	This helps us count how many people visit the site by tracking if you've visited before	24 hours
_gat	Used to manage the rate at which page view requests are made	10 minutes

## GOOGLE ANALYTICS

Name	Purpose	Expires
_utma	Like _ga, this lets us know if you've visited before, so we can count how many of our visitors are new to the site or to a certain page	2 years

_utmb	This works with _utmc to calculate the average length of time you spend on the site	30 minutes
_utmc	This works with _utmb to calculate when you close your browser	When you close your browser
_utmz	This tells us how you reached the site (for example from another website or a search engine)	6 months

## **CALL TRACKING AND RECORDING**

We use telephone tracking numbers to link a user's call to the marketing channel that they originated from. This is done using cookies - you can choose to decline cookies, as explained above, if you would prefer not to be tracked.

## **DOWNLOADS & MEDIA FILES**

Any downloadable documents, files or media made available on this website are provided to users at their own risk. While all precautions have been undertaken to ensure only genuine downloads are available, users are advised to verify their authenticity using third party antivirus software or similar applications.

We accept no responsibility for third party downloads and downloads provided by external third-party websites and advise users to verify their authenticity using third party antivirus software or similar applications.

## **EXTERNAL WEBSITE LINKS & THIRD PARTIES**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and look at the appropriate privacy policy applicable to the relevant website being used.

## **SOCIAL MEDIA USAGE**

While we may have official profiles on social media platforms, users are advised to verify authenticity of such profiles before engaging with, or sharing information with such profiles. We will never ask for user passwords or personal details on social media platforms. Users are advised to conduct themselves appropriately when engaging with us on social media.

There may be instances where our website features social sharing buttons, which help share web content directly from web pages to the respective social media platforms. You use social sharing buttons at your own discretion and accept that doing so may publish content to your social media profile feed or page. You can find further information about some social media privacy and usage policies in the resources section below.

## **RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION**

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

- **Request access** to your personal information and to receive a copy of it.
- **Request correction** of the personal information that we hold about you.
- **Request erasure** of your personal information where there is no good reason for us continuing to process it.
- **Object to processing** of your personal information 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 ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

To assert any of these rights please contact us in writing. You will not have to pay a fee to exercise your rights. However, we may charge a reasonable fee or refuse to comply with your request if your request for access is clearly unfounded or excessive.

## **RIGHT TO WITHDRAW CONSENT**

In limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## **CONTACT**

If you have any questions about this privacy notice, please contact Stuart Bain;

Phone: +44 (0) 1224 456789

Email: [SBain@andersonbain.co.uk](mailto:SBain@andersonbain.co.uk)

## **RESOURCES & FURTHER INFORMATION**

- [Overview of the General Data Protection Regulation \(GDPR\)](#)
- [Data Protection Act \(DPA\) 1998](#)
- [Privacy and Electronic Communications Regulations \(PECR\) 2003](#)
- [The Guide to the PECR 2003](#)
- [Twitter Privacy Policy](#)
- [Facebook Privacy Policy](#)
- [Google Privacy Policy](#)
- [LinkedIn Privacy Policy](#)