

# Howard and Company - Privacy Notice

## Introduction

Howard and Company (Egham) Ltd which trades as Howard and Company (referred to in this document as Howard and Company) is committed to respecting our customers' privacy and protecting their personal information from misused or unauthorised disclosure and complying with privacy laws. Howard and Company values its reputation and aims to maintain high ethical standards in the conduct of our business affairs.

This privacy policy explains how we use any personal information we collect about you when you use this website.

## Business Summary

Howard and Company is a professional services company, specialising in the business area of accountancy. We process personal information to enable us to provide accounting, and related services, to support our clients, maintain our own accounts and records and to support and manage our employees. Specifically we profit the following services, although this list is not exclusive:

- Bookkeeping
- VAT Return preparation and filing
- Management accounts
- Periodic accounts reviews
- Preparation and filing of annual accounts
- Preparation and filing of annual tax returns
- Company formation and company secretarial services
- Payroll processing
- Business pension processing
- Profit improvement consultancy
- Personal and business tax planning
- Business start-up advice
- Business disposals
- Business retirement strategies

Howard and Company employs less than 10 staff and the business is located in Egham in Surrey, UK.

## Organisation Contact Details

The name and contact details of the data controller are:

Email address: [Stephen.Guy@howardonline.com](mailto:Stephen.Guy@howardonline.com)  
Telephone: 01784 439199  
Postal address: 73a High Street, Egham, Surrey, TW20 9HE, UK

## Data We Collect – Online Services

This Privacy Policy relates to our use of any personal information we collect from you via online services.

Howard and Company does not collect any personal data from our website with the sole exception of your email address if you choose to contact us using the form on our "Contact us" page and any other personal information you voluntarily include on that form. Any such information is used solely to enable us to reply to you.

Emails you may send to us at any of our email addresses which all end in "@howardonline.com" is treated by us in the same way as any other correspondence, and will always be treated as private and confidential.

## When, Why and How we gain Consent (Legal Basis)

We will not collect any information about you without your explicit consent.

We will ask your consent every time we need to collect personal information about you.

We will explain in clear simple terms why we want to collect information and what we will do with it before seeking your consent so you are fully informed and you will be given a clear and unambiguous option to opt in to any communications or services we might want to offer you.

## Why we Collect Personal Data

We collect information about you to provide the accountancy services you have asked us to provide and manage your account.

We may analyse information for the purpose of ensuring you comply with accounting, tax pension and company legislation.

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We also use it for business, regulatory and legal purposes, like:

- Dealing with any requests you make, or content you submit
- Getting in touch if we need to tell you about something, like a change to our policies or issues with a service.

### **Who Processes the Data we Collect (Who are the recipients of your data)**

We will store and process your data following industry best practice and security.

We will take all reasonable steps to ensure that there are appropriate arrangements in place that includes provisions covering the appropriate secure transfer, handling and processing of the personal information by those entities and third parties. Most of that processing takes place at Howard and Company in Egham in the UK.

We do not transfer data outside of the UK for processing unless it is to enable a member of staff to answer a specific question or provide support to a client whilst on holiday outside of the UK.

Where processing takes place by one of our trusted data processors, we ensure that our contracts with those 3<sup>rd</sup> parties contain the appropriate GDPR model clauses and that all our 3<sup>rd</sup> parties are also compliant with GDPR. This affords your data the same protection away from our organisation as it does within it.

### **Where we might send your personal data (Geographically)**

We process data within the UK, a country which is deemed by the European Union as having adequate suitable safeguards for protecting personal data, and for protecting the rights and freedoms of individuals and recourse processes by which data subjects can exercise their rights.

We will only consider transferring your data outside the EU if the following conditions are met. A transfer or set of transfer may be made where the transfer is:

- Made with your explicit informed consent
- Necessary for the performance of a contract between you and this organisation or for pre-contractual steps we need to take at your request
- Necessary for the performance of a contract made in your interest between this organisation and another person
- Necessary for important reasons of public interest
- Necessary for the establishment, exercise or defence of legal claims
- Necessary to protect your vital interest or those of other persons, where you are physically or legally incapable of giving consent.

Or

- Made from a register which under UK or EU law is intended to provide information to the public (and which is open to consultation by either the public in general or those able to show a legitimate interest in inspecting the register).

### **How long do we keep your data**

The data referenced about in the section "Data We Collect":

- Is kept within our email system for 12 months
- After 12 months it is moved to a dormant state
- After 24 months it is deleted from our systems

We use active records for some or all of the activities detailed in the section above "Why We Collect Personal Data". If we have recorded no positive activity from you after 12 months your record will become dormant. If there is no positive activity from you with 24 months we will delete your records.

Positive activity means that you interact with either the website or through any of the communication methods we use to contact you.

It is our responsibility to be able to demonstrate this positive activity and if we cannot then your details will become dormant and eventually be deleted.

### **Your Rights as an Individual in Respect of the Data We Hold**

We respect the rights and freedoms of individuals and as such we would like to make you aware of the following.

You have the right to:

- Request access to your data
- Request rectification of your data where there are errors or inaccuracies or the data is not current
- Request that the data we hold is removed entirely from our systems.
- Request us to restrict processing of your data

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- Object to our processing of your data
- Request your data in a format that is commonly used/accepted
- Send your data to another controller
- Withdraw consent already provided – at any time

You also have the right to complain to this organisation

To exercise your rights above please contact the Data Controller via any of the channels provided.

You also have the right to lodge a complaint with a supervisory authority. In this instance the ICO and their contact details are as follows:

<https://ico.org/concerns/handling/> or call the ICO on 0303 123 1133.

### Quick Links for exercising your rights

Controller email address: [Stephen.Guy@howardonline.com](mailto:Stephen.Guy@howardonline.com)

Controller phone number: 01784 439199

### Data Sources – where did you get my data

Any and all data in respect of “Data We Collect” is collected directly from you, the individual.

We do not collect any of your personal data from any other sources. This included any publicly accessible list and or data sources, whether in the public domain or if we have a legitimate interest to be able to access those sources legally.

### Do we have a statutory or legal right to hold this data

We have no statutory or legal right to hold the data you have provided, and detailed in respect of “Data We Collect”.

We rely on consent to collect and store this data, and uphold all of the individual’s rights and freedoms with respect to personal data given by consent.

See section “Your Rights as an Individual in Respect of the Data We hold”

### Automated Decision Making, Profiling, and what that means for you

No data in respect of “Data We Collect” is subject to any form of automated decision making.

We do not profile you using your data. Any actions taken by us or our systems are as a direct result of explicit requests or consents you have chosen.

There are no foreseeable consequences of any significance in respect of providing the data or being removed from the records, except that we will not be able to contact you.

### Cookie Policy

We do not use cookies on our website.

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer, tablet or mobile phone (all referred to here as a “device”) we browser from a website’s computer and is stored on your device’s hard drive.

Each website can send its own cookie to your web browser if your browser’s preferences allow it. Many websites do this whenever a user visits their website in order to track online traffic flows.

Similar technologies are also used within some emails to understand whether the email has been read or if any links have been clicked.