



PRIVACY POLICY

Robinsons Consulting Limited (Robinsons) Privacy Notice

This notice was last updated on 1 August 2021

ROBINSONS
Chartered Certified Accountants

Who we are:

Robinsons Consulting Limited (Robinsons) is a firm of Accountants engaged in the provision of Accounting, taxation, and other business services to clients in the Greater London area and throughout the South East of England. We are registered as a data controller with reference number **Registration number Z7171326**

This Privacy notice is intended to explain how we may collect and use any personal information that we obtain about you and your rights in relation to that information. In line with our aim to have a consistent approach to protecting personal data.

It is based on data protection principles that are set out in the UK and relevant European Union data protection laws.

1. Definitions

GDPR

Means the EU-General Data Protection Regulation (Regulation (EU) 2016/679) including its implementing national legislation.

Personal data

Means any information relating to an identified or identifiable living person.

Processing

Means anything that is done to, or with, personal data (including obtaining, recording, holding, disclosing, transmitting, making available, using, or deleting those data).

Robinsons is strongly committed to protecting personal data in accordance with GDPR regulations. This privacy Notice describes why and how we collect and use personal data and provides information about individuals' rights in relation to personal data. It applies to personal data provided to us, both by individuals themselves and by others. We may use personal data provided to us for any of the purposes described in this privacy Notice or as otherwise stated at the point of collection.

2. Our lawful basis for processing

We rely on several lawful basis of processing when we collect and use personal data to operate our business and provide products and services to our clients.

These include:

- Public interests – where the processing of data is necessary for providing certain services to clients (e.g., Statutory Accounts).
- Legal obligations – to comply with the legal and regulatory obligations we are subject to as a provider of regulated services and as a commercial business.
- Contract – to perform contractual obligations, we may have with an individual or to take steps to enter a contract with an individual.
- Consent – where an individual has freely given consent at the time their personal data was provided to us.

Personal data we may process

The personal data we collect is limited to your name, address (physical and electronic) together with such other data as is required to fulfil our Engagement with you. In the conduct of our business we engage in different business development and related activities with current and potential clients and other relevant third parties. For these purposes, we process certain “*business development data*” such as:

- contact information (e.g., name, work address, telephone numbers, e-mail, position), communication data, and other business-related information.
 - data on (marketing) preferences and fields of interest; and/or
 - data on past participation in marketing initiatives.
- These data are provided directly by, or obtained from, the relevant data subject or other business contacts and sources (e.g., business information services, public sources, or registers).

3. How data is stored on our systems and how is it processed

We will not store any data in our systems relating to your identifiable personal information that is not directly relevant or needed for the general use of Robinsons Services.

Your data will be accessible by Robinsons employees, contractors, and temporary workers if that data is required to assist in managing your account. However, this data will never be removed from or copied out of any of the Robinson's platforms.

We may also employ third party services or applications (data processors) to assist in providing Robinsons Services and again this data will only be made available to them for the purposes of providing those Robinsons Services. With these third-party services or applications, adequate contracts will be employed to ensure confidentiality and the privacy of your data.

How we process personal data

Robinsons will always secure that data is processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency'); and is

collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Length of retention of data we hold

Length of retention: Data we have collected relating to you over time that may be required to be kept for legal or financial regulatory reasons will be kept for the statutory 7-year retention period, after which the data will be removed. Examples of this could be (but not limited to) financial invoices and order history, course information that proves we have delivered the required service to you and so on.

Any data that does not need to be kept for legal or financial regulatory reasons will be deleted after 2 years of your ceasing to have an Engagement with us, or your last interaction with us, whichever is greater.

4. Your legal rights in relation to data we hold

If you are an individual whose personal data, and the processing of that personal data are subject to the application of the GDPR, you have certain rights. These rights are identified below together with a brief, non-exhaustive explanation. Where your personal data and the processing of your personal data are not subject to the GDPR these rights do not necessarily apply and nothing in this Notice may be interpreted to establish rights or obligations that go beyond what is mandated by the respectively applicable Data Protection Legislation.

Your right to object to the processing

You have a right to object to the processing in certain situations

Your right to information

You have a right to be informed whether and to what extent we process your personal data

The right of access

If you are an existing client you have a right to obtain confirmation as to whether we process personal data about you, receive a copy of your personal data and obtain certain other information about how and why we process your personal data.

The right to delete your personal data

You have a right to have your personal data deleted where the personal data is no longer necessary in relation to the purposes for which they were collected and processed or where you withdraw consent, and we have no other lawful basis for the processing

The right to rectification

If the personal data, we process is incomplete or incorrect you have the right to request rectification.

The right to restrict the processing

You have the right to request that we restrict the processing of your personal data in certain situations. For example, if you contest the accuracy of your personal data, you may request that its processing is restricted while we verify its accuracy.

The Right to Portability of your Data

At any time, you may request that we send your data to a third party.

To initiate this process, contact our support team using the Contact Us page and we action this request for you.

Please note that we take no responsibility for the use of this data by any third party and are not liable for this data being in any specified format that the third party may request.

5. Data Sharing

We may share your personal information within our IT system. We also use third party technology and may share your information with them, for example a technology supplier support.

We may also have to share your personal information with regulators, government and enforcement agencies, courts and other third parties.

We may share your personal information with third parties, for example banks or mortgage companies where you have consented to us doing so.

6. Data Breaches

To comply with the GDPR regulations, if any breaches of any data occur, we are obligated to inform the ICO (Information Commissioner's Office) within 72 hours of the breach. For any breaches that are considered critical, for example, any breaches that have released financial information, we are obligated to inform you immediately. We will do this using the contact information that we store on you.

7. Disclosure of Information.

We will share your personally identifiable Site Information with third parties only in the ways that are described in this privacy policy. These include, but are not limited to, sharing Site Information with service providers (our contracted Data Processors) to allow them to fulfil your requests. We do not sell or disclose your personal information to third parties.

We may also disclose your personally identifiable information: (a) if we are required to do so by law, regulation or other government authority or otherwise in cooperation with an investigation of a governmental authority.

8. Data Security.

The security of your personal information is important to us. Robinsons employs procedural and technological measures to protect your personally identifiable information. These measures are reasonably designed to help protect your personally identifiable information from loss, unauthorised access, disclosure, alteration, or destruction.

We may use software, secure socket layer technology (SSL) encryption, password protection, firewalls, internal restrictions, and other security measures to help prevent unauthorized access to your personally identifiable information.

We have implemented generally accepted standards of technology and operational security to protect personal information from loss, misuse, alteration, or destruction. Only authorised persons are provided access to personal information; such individuals have agreed to maintain the confidentiality of this information.

Although we use appropriate security measures once we have received your personal data, the transmission of data over the internet (including by e-mail) is never completely secure. We endeavour to protect personal data, but we cannot guarantee the security of data transmitted to or by us.

9. Mailings & Marketing

Newsletters and occasional marketing and forum mailings are made to our users, members and third parties.

Robinsons Consulting Limited Consulting Limited complies with the laws laid out in the General Data Protection Regulations (GDPR).

We will never give or sell your details to third parties – your data will remain solely with us and our group of companies. You have the right to opt-out of any marketing. If you have already opted in to receive email from us but do not wish to continue to receive such mailings you can simply opt-out using the unsubscribe link provided at the bottom of every email. With some of our products and services, for example (but not limited to) some webinars we run on certain platforms, we may collect your telephone data and use SMS marketing to assist with two-factor authentication, or to inform you of start times, changes to event details, or to illustrate or advertise products or services. If you wish at any time to opt-out of these SMS marketing communications, contact our support team using the Contact Us page and we will respond to your request.

10. Material Changes.

Robinsons reserves the right to change this Privacy Policy from time to time. We will post the revised Privacy Policy on this page and will either send a notice to the e-mail address that you specified in your registration and/or post notice of the change so it is visible when users log-on for the first time prior to said changes taking effect so that you are always aware of what personal information we may collect and how we may use this information.

We encourage you to review this Privacy Policy regularly for any changes. Your continued use of the Site and/or Services will be subject to the then-current Privacy Policy.

11. Financial Information.

Robinsons do not store any financial information such as users credit card details, passwords, or PayPal passwords. Any payment information that is collected at the time of purchase is defined above. PayPal may store information, but they are a separate company so please refer to their terms and conditions, and privacy policy.

The exception to this rule is if you choose to use the CRM tool and in which case you may choose to add your invoice payment details to the settings, quotations, or invoices. You may also choose to create quotations and invoices using the system which would also be stored. As with the rest of this policy, this information is treated as private and confidential and not shown to any other parties or members.

12. Contact details

We welcome your comments or questions concerning our Privacy Policy. If you would like to contact Robinsons regarding this Privacy Policy, contact our support team using the Contact Us page

You may also contact us at the following postal address:

The Data Controller
Robinsons Consulting Limited
5 Underwood street London N1 7LY
Email: info@robinsonslondon.com
Telephone: 0207 684 0707

You also have the right to lodge a complaint:

- by using the contact details above; and/or
- with a competent supervisory authority.

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