



## Personal Information And Privacy Policy of Haque Associates Ltd

Haque Associates Ltd understands that your privacy is important to you and that you care about how your information is used and kept by us. We respect and value the privacy of everyone and will only collect and use information in ways that are useful to you and in a manner consistent with your rights and our obligations under the law.

The Data Protection Law will change on the 25<sup>th</sup> May 2018. This notice provides the right under the new law, and we will update it when the changes come into effect.

This policy applies to our use of any and all data collected by us and how Haque Associates Ltd promises to look after your information. Please read the Privacy Policy carefully and ensure that you understand it.

### **1. Principles of Data Protection & Privacy Promise**

Our approach to data protection is built around three key principles. They are at the heart of everything we do relating to personal data.

**Transparency:** We take a human approach to how we process personal data by being open, honest and transparent.

**Security:** We champion industry leading approaches to securing the personal data to keep it safe and private.

**Stewardship:** We accept the responsibility that comes with processing personal data.

### **2. Who We Are**

HA Accountants is the trading name of Haque Associates Limited. Registered in England & Wales, Company No: 7385104. Registered Office: 26 Leagrave Road, Luton, Bedfordshire, LU4 8HZ. Our other group trading names include Haque Associates, HA Commercial & Insurance Services and HA Solutions.

Our ICO registration number is Z7365326.

We do not require a Data Protection Officer, however, we have a dedicated compliance team for Data Protection regarding general requests, queries, access and other information.

Our main contact is Samsul Haque and can be contacted by email at [info@ha-accountants.co.uk](mailto:info@ha-accountants.co.uk) or by post at 26 Leagrave Road, Luton, Bedfordshire, LU4 8HZ.

For European Union data protection services, we act as data controller and data processor in relation to your personal data.



## Personal Information And Privacy Policy of Haque Associates Ltd

### **3. What Information Do We Collect?**

Depending upon the use of our services we may collect some or all of the following data:

- Personal Data;
  - Name;
  - Title;
  - Address;
  - Post Code;
  - Telephone Numbers;
  - Date of Birth;
  - Marital Status;
  - Gender
  - Dependants;
- Business/Company Name;
- Email Address;
- Passport Details;
- Driver's License Details;
- Personal Bank Details;
- Company Bank Details;
- National Insurance Number (NI);
- Tax Reference Number;
- PAYE Number;
- Company Unique Tax Reference Number (UTR);
- Insurance Policy Details;
- IP Address is (automatically collected);
- Web browser type and version (automatically collected);
- Operating system (automatically collected); and
- A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to (automatically collected).

### **4. What We Use Your Information For?**

All personal information is stored securely in accordance with the principles of the Data Protection Act 1998.

We use your data to provide the best possible products and services to you. This includes:

- Providing and managing Inland Revenue Accounts;
- Providing and managing your access to our Site;
- Supplying our products and services to you;
- Personalising and tailoring our products and services for you;
- Responding to communication from you;
- Inland Revenue Tax calculation & Obligations;



## Personal Information And Privacy Policy of Haque Associates Ltd

- Self Assessment Returns;
- Payroll;
- Corporation Tax Return;
- Submitting VAT Returns;
- Other accounting related work including Tax & Business Advisory Services;
- Auto Enrolment;
- Fee Protection contracts from Providers;
- Insurance contracts from Providers;
- Subscription from software from suppliers;
- Supplying you with email newsletters and information that you have subscribed to (you may unsubscribe or opt out at any time by clicking on the unsubscribe link at the bottom of the email or by contacting us at HA Accountants);
- Keeping you informed of our products and services;
- Market research;
- Analysing your use of our Site and gathering feedback to enable us to continually improve our Site and your experience.

With your permission and/or where permitted by law, we may use your data for marketing purposes which may include contacting you by email, telephone, text message, post and through digital channels which includes social media. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the Data Protection Act 1998 and the Privacy and Electronic Communication (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015.

### **5. How We Collect Your Information**

When you visit our website or use our services, we collect personal data. The ways we collect it can be broadly categorised into the following:

**Information you provide to us directly:** When you visit or use some parts of our website and/or services we might ask you to provide personal data to us. For example, we ask for your contact information when you sign up for a trial, respond to a job application or an email offer, join us on social media or take part in training and events, contact us with questions or request support. If you do not want to provide us with personal information, you do not have to, but it might mean you cannot use some parts of our websites or services.

**Information we collect automatically:** We collect some information about you automatically when you visit our websites or use our services, like your IP address and device type. We also collect information when you navigate through our websites and services, including what pages you looked at and what links you clicked on. This information is useful for us as it helps us get a better understanding of how you are using our websites and services so that we can continue to provide the best experience possible (e.g., by personalising the content you see).



## Personal Information And Privacy Policy of Haque Associates Ltd

Some of this information is collected using cookies and similar tracking technologies. If you want to find out more about the types of cookies we use, why, and how you can control them, take a look at our cookie notice below.

**Information we get from third parties:** The majority of information we collect, we collect directly from you. Sometimes we might collect personal data about you from other sources, such as publicly available materials or trusted third parties like our marketing and research partners. We use this information to supplement the personal data we already hold about you, in order to better inform, personalise and improve our services, and to validate the personal data you provide.

Where we collect personal data, we'll only process it:

- to perform a contract with you, or
- where we have legitimate interests to process the personal data and they are not overridden by your rights, or
- in accordance with a legal obligation, or
- where we have your consent.

If we don't collect your personal data, we may be unable to provide you with all our services, and some functions and features on our websites may not be available to you.

### **6. Where Do We Store Your Information?**

We do not store or transfer data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely under the Data Protection Act 1998. Such steps may include, but not be linked to, the use of legally binding contractual terms between us and any third parties we engage and the use of the EU approved Contractual Arrangements.

Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through our Site and our Premises.

Notwithstanding the security measures that we take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to us data via the internet.

### **7. Do We Share Your Information?**

In certain circumstances we may be legally be required to share certain data held by us, which may include your personal information, for example, where we are involved in legal proceedings, where we are complying with requirements of legislation, court order, or a government authority. We may share information with Tax Authorities, Company House and



## Personal Information And Privacy Policy of Haque Associates Ltd

other government agencies and software providers. We do not require any further consent from you in order to share your data in such circumstances and will comply as required with any legal binding requests that are made of us.

When we share data, it may be transferred to, and processed in, countries other than the country you live in – such as to the United States, where our data hosting provider's servers are located. These countries may have laws different to what you're used to. Rest assured, where we disclose personal data to a third party in another country, we put safeguards in place to ensure your personal data remains protected.

For individuals in the European Economic Area (**EEA**), this means that your data may be transferred outside of the EEA. Where your personal data is transferred outside the EEA, it will only be transferred to countries that have been identified as providing adequate protection for EEA data, or to a third party where we have approved transfer mechanisms in place to protect your personal data.

We use a number of different companies and solutions to hold and process our data.

The following are a list of them and the links to their privacy policies:

**Infusionsoft** <https://www.infusionsoft.com/legal/privacy-policy>

**Xero** <https://www.xero.com/uk/about/terms/privacy/>

**Microsoft Office** <https://privacy.microsoft.com/en-us/privacystatement>

**Google Analytics/ Google Sheets** <https://policies.google.com/privacy>

**Facebook** <https://www.facebook.com/about/privacy/update>

**Act** <https://www.act.com/en-uk/privacy-policy>

**TaxFiler** <https://taxfiler.co.uk/privacy>

**FTax** [https://www.ftax.co.uk/index.php?action=page\\_display&tpl=privacyPolicy](https://www.ftax.co.uk/index.php?action=page_display&tpl=privacyPolicy)

**Company House** <https://www.gov.uk/government/organisations/companies-house/about/personal-information-charter>

**4Com** <https://www.4com.co.uk/privacy-policy/>

**SmartDebit** <https://www.smartdebit.co.uk/privacy/>

**Moneysoft** <https://moneysoft.co.uk/privacy-notice/>

### **8. Data Protection Measures**

#### **Security**

Security is a priority for us when it comes to your personal data. We are committed to protecting your personal data and have appropriate technical and organisational measures in place to make sure that happens.



## Personal Information And Privacy Policy of Haque Associates Ltd

### Firewalls

We use firewalls on all internet facing elements of our infrastructure to protect data and control traffic into and out of the business. Firewalls are also enabled on all employee endpoints at all times. IDS and IPS are enabled on our production environment firewalls.

### Antivirus

All our equipment and servers are protected using appropriate real-time anti-virus, antispyware and anti-malware software. An Anti Malware policy is in place to ensure that staff are fully aware of their obligations and do not obstruct the operation of the application.

### Secure equipment including laptops and mobile phones

All company laptops and mobile phones are full disk encrypted and are individually password protected.

## **9. Data Retention**

We are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

Personal data processed is kept by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). In the absence of specific legal, regulatory or contractual requirements, our retention policy period for records and other documentary evidence created in the provision of services is 7 years. Information regarding pensions will be kept for as long as it is required. Anti-Money Laundering Requirements require us to hold on to data for up to 10 years.

## **10. Your Rights**

This statement is intended to provide information about what personal data we collect about you and how it is used. It is your personal data and you have certain rights relating to it. When it comes to marketing communications, you can ask us not to send you these at any time – just follow the unsubscribe instructions contained in the marketing communication, or send your request to [info@ha-accountants.co.uk](mailto:info@ha-accountants.co.uk)

You also have rights to:

- know what personal data we hold about you, and to make sure it's correct and up to date
- request a copy of your personal data, or ask us to restrict processing your personal data or delete it



## Personal Information And Privacy Policy of Haque Associates Ltd

- object to our continued processing of your personal data

You can exercise these rights at any time by sending an email to [info@ha-accountants.co.uk](mailto:info@ha-accountants.co.uk)

If you're not happy with how we are processing your personal data, please let us know by sending an email to [info@ha-accountants.co.uk](mailto:info@ha-accountants.co.uk). We will review and investigate your complaint, and try to get back to you within a reasonable time frame. You can also complain to your local data protection authority. They will be able to advise you how to submit a complaint.

### Your Right To Withhold Information

You may access certain areas of our Site without providing any data at all. However, to use all features and functions available on our Site you may be required to submit or allow for the collection of certain data.

You may restrict your internet browser's use of Cookies.

### How Can You Access Your Data?

You have the legal right to ask for a copy of any of your personal data held by us (where such data is held). Please contact us for more details at [info@ha-accountants.co.uk](mailto:info@ha-accountants.co.uk).

## **11. Cookies Policy**

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our Site and to provide and improve our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy is protected and respected at all times.

All Cookies used by and on our Site are used in accordance with current UK and EU Cookie Law.

Before Cookies are placed on your computer or device you will be shown a pop-up message requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you.

You may, if you wish, deny consent to the placing of Cookies; however certain features of our Site may not function fully or as intended.

Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how people use our Site. This, in turn, enables us to improve our Site and the products and services offered through it. You do not have to allow us to use these Cookies, however



## **Personal Information And Privacy Policy of Haque Associates Ltd**

whilst our use of them does not pose any risk to your privacy or your safe use of our Site, it does enable us to continually improve our Site, making it a better and more useful experience for you.

The analytics service(s) used by our Site use(s) Cookies to gather the required information. You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies at any time however you may lose any information that enables you to access our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

### **12. Complaints**

If you do want to complain about our use of your personal data, please contact us with the details of your complaint. You also have the right to register a complaint with the Information Commissioner's Office ("ICO"). For further information on your rights and how to complain to the ICO, please refer to their website.

### **13. Contacting Us**

If you have questions about Our site or this Privacy Policy, please contact us by email at [info@ha-accountants.co.uk](mailto:info@ha-accountants.co.uk) by telephone on 01582 481381 or by post at 26 Leagrave Road, Luton, LU4 8HZ.

### **14. Changes to Our Privacy Policy**

We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.