# Customer Privacy Statement

This Statement sets out how Hartley Thomas Limited may use and disclose

personal information that we may collect about you. We adhere to the 1998

Data Protection Act and the new Data Protection Bill when it comes into effect in May 2018.

We are registered with the Information Commissioner ((Registration Number Z2503840). Hartley Thomas is the data controller of your personal information for the purposes of Data Protection law.

## A. Information we may collect from you

This will depend on the service you are interested in or ask us to provide – for example greater controls are required in the provision of accounting services.

During the course of our engagement we may collect the following data on you

* Information you may provide us with such as your name and contact information so we can discuss how we may be able to meet your service needs
* Correspondence and communications information
* Information obtained as part of us delivering our services to you
* Information obtained from the usage of our online service
* For accounting services only – information required for us to check your identity as required by law

We do not monitor or record our calls.

Hartley Thomas does not collect any data on visitors to our public website such as information about your computer, your location, or browser, we do not use cookies on our public facing website, and we do not use any web analytic tools. This means any visitor to our public website [www.hartleythomas.co.uk](http://www.hartleythomas.co.uk) is anonymous at all times.

However, once we have signed an agreement to provide you with services we may deliver this using online tools to enable us to collect and process your information. These tools will confirm your identity, track your activity, and actions whilst you are online using our systems This is so we can improve the performance of our service, offer you an acceptable online experience, and maintain the security of our systems and your data. In addition to our online tools, our online service may use cookies. You can refuse to accept cookies by activating the setting on your browser, which refuses the setting of cookies. However, if you select this you may not be able to use certain parts of our online services. For a guide on how to change settings on most internet browsers please visit [http://www.aboutcookies.org/](http://www.aboutcookies.org/%22%20%5Ct%20%22_blank).

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## B. How we use your information and how long we will hold it

Hartley Thomas collects and processes your information for providing you with our services. We use it to:

- enable us to respond to your enquiries and correspond with you

- prepare quotations for our services

- provide you with information about our services which may be of interest to you

- deliver our services

- deliver the best possible and secure service if you use our online service delivery tools

- check your identity using an identity check (accounting services only)

We store and process your information on our computers and in any other way we decide is appropriate. Sending information via the internet is not completely secure. Although we will do our best to protect your personal data, any data transmission is made at your own risk.

We will retain your information so long as we are required to do so by law or for the purposes of continued service delivery. For accounting related information this will be for a period of 5+1 years from delivery of your final transaction and for identity checks 5 years from the date the check was conducted. We shall retain information if we are in dispute and we have reasonable grounds that arbitration or legal proceedings may follow and all personal information for one year after we ceased to use a sub-contractors service or a client’s agreement has terminated.

To protect your data you must not let anyone else use your name, log in details, or passwords.

## C. How we share your information

HTL will not pass on your personal information to third parties (except for the reasons set out below). HTL shall not publish your personal information in the public domain, nor disclose your information to providers of other goods and services.

HTL shall only pass your personal information to a third party if:

1. HTL uses a third party to perform the service or process or store your data
2. HTL is required by law or may reasonably believe HTL is required by law to do so, if HTL is required to service a legal process, or if HTL need to prevent a crime or fraud, protect personal safety of HTL users or the public, protect HTL rights and property.
3. HTL buys or sells its business or assets in which case HTL may disclose your personal information to the seller or buyer of such business or assets
4. If HTL transfers our rights or duties to a third party

We may transfer and store your data outside the UK or the European Economic Area (EEA) in order to perform the services you have asked us to provide. Before you agree for us to provide services to you, we shall seek your consent for us to do so. We will take all steps reasonably necessary to ensure that your Information is treated securely and in accordance with our obligations laid out under UK law.

## D Granting or removing consent to process data

Your personal data is important and you will need to grant us your consent to use your data. Prior to submitting a proposal we shall secure your written consent by email to use your data for the purposes of assessing your needs, providing proposals, resolving issues and delivering service to you.

If we sign a contract to deliver services that contract will provide us with the right to use your personal data should we need to.

If at any point you wish to opt out of being contacted by us or wish to exercise your right to be forgotten i.e. removing your personal data from our records to the extent that the law allows please write to us at the contact details below and we shall confirm back to you the action we have taken.

We reserve the right to take reasonable steps to authenticate your identity with respect to any such request or other enquiry.

## E Your rights

**You have the right to:**

* **Request access to the information we hold on you. We are obliged to reply to you within four (4) weeks unless there are specific circumstances that may delay this in which case we shall contact you to explain. There will be a small charge of £25 per request (one request per person) for administering this service.**
* **You may ask us to correct any information we hold on you which you believe is inaccurate, incomplete, or notify us if your circumstances have changed. HTL shall endeavour to make such changes within 10 working business days and shall inform you of the action we have taken.**
* **You may ask us to delete the information we hold on you subject to the retention rights set out in (B) above.**
* **You may exercise these rights by writing to us at our contact details below.**

## F Where HTL is a data processor for another organisation

HTL provides specialist services as a provider of back office support to customers. These services are individually negotiated and tailored to the specific customer. HTL provides such services using the customer’s systems. In such circumstances HTL is acting as a Data Processor and will manage personal data to comply with our contract terms and the law.

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## G Contact information

Your written requests should be sent to HTL at the following address:

Data Protection Officer,

Hartley Thomas Ltd,

Mill Road, Steyning,

West Sussex,

BN44 3LN

or use our email address info@hartleythomas.co.uk.

## H. Updates to HTL’s data protection policy and privacy information

If HTL changes our policy we shall post the changes on our website on the contacts page; http://www.hartleythomas.co.uk/?wht\_Contact\_Us