

# IMPORTANT INFORMATION ON OUR DATA PRIVACY POLICY

## PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Tax and Accounting Hub collects and processes your personal data, in accordance with the General Data Protection Regulations (GDPR).

It is important that you read this privacy notice together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements all other notices and is not intended to override them.

## CHANGES TO THE PRIVACY NOTICE

Any changes we make to our privacy policy notice in the future will be update via our website.

## THIRD-PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## THE TYPES OF DATA WE HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes (but not limited to) first name, maiden name, surname, username or similar identifier, marital status, title, date of birth, gender, nationality, country of residence, the nature of our relationship with you (e.g. client, referral from professional networking team ).
- **Contact Data** includes (but not limited to) work address, residential/home address, delivery address, email address and telephone numbers.
- **Financial Data** includes (but not limited to) bank account and payment card details together with any and all financial, tax, compliance reporting data information provided to or generated by us in the performance of our agreement with you.

- **Transaction Data** includes (but not limited to) details about payments to and from you and other details of paid for products and services we are providing to you.
- **Technical Data** includes (but not limited to) internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Profile Data** includes (but not limited to) your username and password, purchases or orders made by you, details of the contact we have had with you in relation to the provision of our services, information about any complaints and enquiries you make to us, your interests, preferences, expertise/areas of work, feedback and survey responses.

## IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services). Alternatively, we may be unable to comply with our legal or regulatory obligations. In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

## HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial by filling in forms or by corresponding with us by post, telephone, email or person at the meeting.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, website portal emails and other similar technologies.
- **Third parties or publicly available sources.** We may purchase or receive personal data about you from various third parties and public sources. In this instance, we are using data that already exists and therefore are not responsible for the origination or accuracy of it. Examples of where we may get this information are set out below:

Technical Data from the following parties:

1. analytics providers such as Google based inside or outside the EU;
  2. advertising networks such as Google based inside or outside the EU; and
  3. search information providers such as Microsoft or Google based inside or outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Google Drive, PayPal based inside **OR** outside the EU.

- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU or the Internal Revenue Service based in the USA.
- Identity and Contact Data from external anti-money laundering verification providers.

## HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you. This is necessary for the performance of our services and to comply with our legal obligations. This may include processing your personal data where you are an employee, subcontractor, supplier or customer of our client.
- Where it is necessary for our legitimate interests (or those of a third party) provided that those interests do not override your interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development and statistical management purposes.
- Where we need to comply with a legal or regulatory obligation.
- We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. See glossary below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by email us at [info@taxandaccountinghub.com](mailto:info@taxandaccountinghub.com)

## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. Please email us if you need details about the specific legal basis we are relying on to process your personal data where more than one basis purpose to register you as new client, billing, tax deadline reminder updates.

## OPTING OUT

You can ask us to stop sending you tax technical and reminder messages at any time by email us at [info@taxandaccountinghub.com](mailto:info@taxandaccountinghub.com)

Where you opt-out of receiving these messages, this will not apply to personal data provided to us as a result of a service, service experience or other transactions.

## CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- Internal Third Parties as set out in the [glossary](#)
- External Third Parties as set out in the [glossary](#)
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## TRANSFERRING PERSONAL DATA OUTSIDE THE EEA

We will transfer the personal data we collect about you to the following countries outside of the EEA: Singapore, India, UAE, in order to perform our contract with you.

## DATA SECURITY

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider:

- The requirements of our business and the services provided;
- Any statutory and legal obligations;
- The purposes for which we originally collected the personal data;
- The lawful grounds on which we based our processing;
- The types of personal data we have collected;
- The amount, nature/categories, and sensitivity of the personal data;
- The potential risk of harm from unauthorised use or disclosure of your personal data;
- Whether the purpose of the processing could reasonably be fulfilled by other means.

Details of retention periods for different aspects of your personal data are available in our retention policy. In relation to marketing and referrals only:

- Should you not reply to our communications in line with GDPR regarding acceptance of our privacy notice and opt-in for either marketing communications, or to remain on our database as a referrer; your identity, contact, profile and marketing and communications data, will be kept for a period of 12 months and then deleted.
- Should you opt out of marketing communications and/or our referral database, your details (identity, contact, profile and marketing and communications data), will be kept on a suppression list that is only accessible by a limited number of staff within Tax and accounting Hub.

## YOUR LEGAL RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

### YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes which we need to be made aware of by emailing us on [info@taxandaccountinghub.com](mailto:info@taxandaccountinghub.com).

### YOUR RIGHTS IN CONNECTION WITH PERSONAL DATA

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- **Request access to your personal data.** This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully
- **Request correction of your personal data.**
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below.)
- **Object to processing of your personal data** 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 basis. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request restriction of processing your personal data.** This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request transfer of your personal data** to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.
- **Right to withdraw consent.** In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time.

If you wish to exercise any of the rights set out above, please contact our Data Protection Officer.

### NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Under GDPR article 12.3, this period will be extended by two further months where necessary, taking into account the complexity and number of requests.

## CONTACT DETAILS

Our full details are:

**Data Protection Officer:** Kader M Jawali Ameen

**Address:** Tax and Accounting Hub Ltd, Hallings Wharf Studio Office, 1A Cam Road London, e15 2SS, United Kingdom

**Email address:** [Kader@taxandaccountinghub.com](mailto:Kader@taxandaccountinghub.com)

**Telephone number:** +44 (0)20 82211154

## GLOSSARY

### LAWFUL BASIS

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**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by emailing us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## THIRD PARTIES

### INTERNAL THIRD PARTIES

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Other companies in the Tax and Accounting Hub Ltd Group acting as joint controllers or processors and who are based in the United Kingdom, Singapore, UAE, and India and provide IT and system administration services and undertake leadership reporting.

### EXTERNAL THIRD PARTIES

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- Service providers acting as processors based in the EU who provide IT and other system administration services
- Services providers who are Tax and Accounting Hub Ltd, ITIN representative based in India, Singapore, and UAE who provide assistance with ITIN (Individual tax Identification application process) Services for our clients based in local regions.
- HM Revenue & Customs, Internal Revenue Service, regulators and other authorities acting as processors or joint controllers based in the United Kingdom, United States of America Singapore, United Arab Emirates and India who require reporting of processing activities in certain circumstances.

## YOUR LEGAL RIGHTS

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You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing



purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent