



Privacy Notice

Introduction

Andrews and Palmer takes the protection of your privacy very seriously. We will only use your personal information to deliver the services you have requested from us and to meet our legal obligations.

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain.

Andrews and Palmer is pleased to provide the following Privacy Notice:

Personal Data

Andrews and Palmer uses the information collected from you to deliver the services you have requested from us and provide quotations, make telephone contact and to email you marketing information which Andrews and Palmer believes may be of interest to you and your business. In you making initial contact you consent to Andrews and Palmer maintaining a marketing dialogue with you until you either opt out (which you can do at any stage) or we decide to desist in promoting our services. Andrews and Palmer also acts on behalf of its clients in the capacity of data processor. When working exclusively as a data processor, Andrews and Palmer will be acting on the instruction of its client, and will work hard to ensure that the client is fully GDPR compliant.

We obtain information from you when you engage us to deliver our services, book to attend an event or submit a request to receive a newsletter or marketing information or when you use our website, for example when you contact us about our services. Some personal data may be collected about you from the forms and surveys you complete, from records of our correspondence, phone calls, details you provide us, or from your visits to our website, including but not limited to, personally identifying information like your name, address, dates of birth, telephone number, email address, your unique Tax reference (UTR), National Insurance Number, bank account details and other tax information and net Protocol (IP) addresses. Andrews and Palmer may from time to time use such information to identify its visitors. Andrews and Palmer may also collect statistics about the behavior of visitors to its website.

Andrews and Palmer's website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Cookies help Andrews and Palmer identify and track visitors and their website access preferences. Andrews and Palmer website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Andrews and Palmer's website.

Any information Andrews and Palmer holds about you and your business encompasses all the details we hold about you and any sales transactions including any third-party information we have obtained about you from public sources and our own suppliers such as credit referencing agencies.

Andrews and Palmer will only collect the information needed so that it can deal with your enquiry and provide the services requested and provide the most appropriate response. We do not sell or broker your data, although coincidentally there may be times when your information could be contained in data that Andrews and Palmer has purchased from a third-party list broker, on behalf of a client.

Legal basis for processing any personal data

To meet Andrews and Palmer's contractual obligations to clients and to also respond to marketing enquiries.

Legitimate interests pursued by Andrews and Palmer and/or its clients

To deliver the services you have requested from us and promote the marketing and consulting services offered by Andrews and Palmer offered to Andrews and Palmer's existing clients.

How is your information used?

Information is used only for the specific purpose for which it was provided. To provide the agreed services we may use your information to:

- *Contact you by post, email or telephone*
- *Verify your identity*
- *Understand your needs and how they may be met*
- *Maintain our records in accordance with legal and regulatory obligations*
- *Process financial transactions*

Consent

Through accepting this privacy notice you are consenting to Andrews and Palmer processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing office@andpal.co.uk or writing to us, see last section for full contact details.

Disclosure

Andrews and Palmer may on occasions pass your Personal Information to third parties exclusively to process work on your behalf. Andrews and Palmer requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR.

Andrews and Palmer do not broker or pass on information gained from your engagement without your consent. However, Andrews and Palmer may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. We may also enforce our Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of Andrews and Palmer, its clients and/or the wider community.

Retention Policy

In accordance with the Act, your personal data is only kept for as long as is necessary to fulfil your request for the services provided etc. We are required by various legislation and our insurers to retain your data where we have ceased to act for you and will continue to store only the personal data needed for seven years after the contract has expired to meet any legal obligations. After seven years any personal data not needed will be deleted.

Data storage

Data is held in the UK using different servers and secure storage. Andrews and Palmer does not store personal data outside the EEA.

Protecting your information

We take the security of your information seriously and have implemented generally accepted security procedures to protect your personal information from loss etc. All employees are required to keep your information confidential under ethical standards that this firm and its employees are required to follow.

Our website contains links to other websites. This privacy policy only applies to our website so when you link to other websites you should read their own privacy policies.

Please note that the transmission of information over the internet or by email is not completely secure and, therefore, we cannot guarantee the security of your data transmitted. On request, we can offer a secure document exchange procedure.

Your rights as a data subject

At any point whilst Andrews and Palmer is in possession of or processing your personal data, all data subjects have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organization.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that Andrews and Palmer refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

Andrews and Palmer at your request can confirm what information it holds about you and how it is processed

You can request the following information:

- Identity and the contact details of the person or organization (Andrews and Palmer) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Andrews and Palmer or a third party such as one of its clients, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (Data Protection Regulator).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

To access what personal data is held, identification will be required

Andrews and Palmer will accept the following forms of ID when information on your personal data is requested: a copy of your national ID card, driving license, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Andrews and Palmer is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to office@andpal.co.uk or by phoning 01747 823147 or writing to us at the address further below.

Changes to Privacy Notice

We keep our Privacy notice under review. Any changes to our privacy notice will be posted on our website. A paper copy of the privacy notice may also be obtain from our office address below.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Andrews and Palmer or its Directors, you have the right to complain. If you do not get a response within 30 days you can complain to the Data Protection Regulator.

The details for each of these contacts are:

Andrews and Palmer, The Board of Directors
32 The Square, Gillingham, Dorset, SP8 4AR
Telephone 01747 823147 or email office@andpal.co.uk

Data Protection Regulator

Information Commission Office (ICO)
Wycliffe House, Water Lane
Wilmslow, Cheshire SK9 5AF
Telephone 03031231113 or email: casework@ico.org.uk