

# Website Privacy Policy

## PRIVACY POLICY

*Web Version: May 2018*

We take your privacy seriously and are committed to protecting and respecting it. This privacy policy sets out the basis on which any information that we collect from you, or that you provide to us, will be processed by us. Note that some of this information will be personal data, which is specifically protected under the *Data Protection Act 1998*. If you are a client of this firm then you will also need to refer to our letter of engagement which contains the terms and conditions under which we will act for you.

By visiting or accessing our website ([www.jvca.co.uk](http://www.jvca.co.uk)) you consent to the practices and procedures described in this Privacy Policy.

### **Our Information**

This website is owned and operated by Jonathan Vowles Chartered Accountants. Our registered office is located at 114 High Street, Cranfield, MK43 0DG. The data controller is Jonathan Vowles.

### **Your information**

We may collect your personal information from a variety of sources, including:

- Information that we collect when you visit our website, for example through the use of cookies.
- Information that we collect from you directly when you contact us;
- Information that you provide by filling in the on-line enquiry form on our site [www.jvca.co.uk](http://www.jvca.co.uk);
- Information that we collect about you from other commercially available sources (such as credit reference agencies or from Companies House);
- Information that you specifically authorise us to access held by third parties (such as HMRC, Companies House or your bank)
- If you become a client, then obviously we will collect other information to enable us to perform the services you request of us.

### **Cookies and IP Addresses**

Our website uses small text files, called cookies, which are automatically stored on your device when you access and use certain features of our website. Cookies are unique so we use them to identify you from other users for the purposes as described in this policy. To find out more about cookies, how to refuse them and how to change your device's cookie settings, you should visit [www.AllAboutCookies.org](http://www.AllAboutCookies.org). Please note that if you refuse to accept cookies or change your device's cookie settings, you may not be able to access all of our website's features.

**Strictly necessary cookies** These are cookies that are required for the operation of our website.

**Analytical/performance cookies** These cookies allow us to recognise new and returning visitors to our website and see how they move around our website.

**Functionality cookies** These are used to recognise you when you return to our website. This enables us to personalise our content for you and remember any preferences set by you. We use Google Analytics to see how you found your way to our website and to measure how you interact with our website's content. These cookies do not store any personal information about you. Find more

information about Google's privacy policy please visit [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners). We also use pixels/cookies from Facebook and LinkedIn. Please consult the individual technology providers for details on how they store this data. We may collect information about your computer, including where available your IP address, operating system and browser type. We use this information for system administration and analysis of your usage of our website.

### **How we use the information**

We may use the information about you to:

- Ensure that content from our website is presented to you in the most effective way;
- If you decide to opt-in to our mailing list, you will receive information such as emails that include a range of topics including company news, updates, related product or service information, opportunities, newsletters, etc.;
- We may collect management information on our email campaigns, such as whether you have read an email sent by us, when and how many times. We will use this information to improve content and services and to inform users about relevant products and services.
- If at any time you would like to unsubscribe from receiving future informational emails, you may opt-out of these communications by clicking the unsubscribe button or by replying 'unsubscribe' to our emails.
- To provide the services that you have contracted with or requested from us. If you are a client, then we will communicate with you regarding your affairs and with newsletters and other information. Whilst you cannot unsubscribe from those communications regarding your affairs and the services we provide to you as a client, you can choose to terminate your relationship with us and then unsubscribe from receiving future emails.
- To help a business partner or trusted third party to provide you with services;
- To administer your account;
- Provide you with information about other products or services that we may offer;
- Notify you about changes to our services;
- Communicate with you regarding enquiries or complaints made by you;
- You may receive communication from us by email, phone, text or post;

### **Disclosure of your information**

We may share your information with:

- Entities within the Jonathan Vowles Business Group including subsidiaries and sister entities, partners, staff, consultants and subcontractors;
- Other specified third parties where we have obtained your consent;
- Our third-party service providers (such as subcontractors or computer service providers) who perform business operations on our behalf.
- Any actual or prospective buyer of our business or its assets.
- As required by law or any order of a court or other competent authority.
- We may disclose your personal information to third parties without your knowledge, if we are under a duty to disclose or share your personal data in order to comply with any legal or professional obligation, or in order to enforce or apply our standard terms of business and other agreements; or

to protect the rights, property, or safety of JVCA, our partners, employees, consultants or subcontractors, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### **Website links**

Our site contains links to third party websites and social media (such as LinkedIn and Twitter). If you follow a link to any of these sites, please note that these sites have their own privacy policies and that we do not accept any responsibility or liability for these other sites or their policies. Please check these policies before you submit any personal data to these websites.

### **Security and storage of your information**

Unfortunately, no data transmission over the Internet or any website can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your information in accordance with applicable data protection laws.

We store your personal information on servers located in the UK, the European Economic Area (EEA) and at locations outside of the EEA, including the United States of America (USA). It may also be processed by individuals based outside the UK or EEA who work for us or are contracted to us.

Regardless of location or whether the person is an employee or contractor we will take reasonable steps to ensure your data is treated securely and aim to impose the same data protection safeguards. By submitting your personal data, you agree to this transfer, storing or processing.

We use appropriate technical and organisational measures to ensure that your data is kept securely and to protect it from loss, misuse, alteration, damage or destruction, wherever it is stored.

Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **Updating your information**

Please let us know if the personal information which we hold about you needs to be corrected or updated by contacting us at [info@jvca.co.uk](mailto:info@jvca.co.uk)

### **Your rights**

By using this Site, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our website. Your continued use of the website following the posting of changes to this policy will be deemed your acceptance of those changes.

You have the right to ask us not to process your personal data for marketing purposes. You can exercise this right at any time by contacting us at [info@jvca.co.uk](mailto:info@jvca.co.uk) or by replying "Unsubscribe" to any of our marketing emails.

The *Data Protection Act 1998* also gives you the right to access the information we hold about you, subject to certain exemptions. Your right of access can be exercised in accordance with that Act.

Please note that be certain we are responding to the right person each access request must be accompanied by verified documents proving your identity and address.

### **Information Retention Policy**

1. Marketing data is regularly updated and you can opt-out or request for your data to be deleted at any time.
2. For information relating to the internal workings of the JVCA business or to our clients we operate an information storage policy that is in line with HMRC, TPR, and AMLR and our professional regulations and guidance.
1. Firstly, we will contact you to return all original documentation to you as soon as possible after processing.
2. Secondly, where we retain copies or digital records we will do so, for most information, for a period of a minimum of 6 years from the end of the tax year. Some specific information will be retained for a period of at least 6 years from the end of the engagement. Where we have information relating to chargeable assets and gifts we will potentially keep that indefinitely as a service to you.
3. In the event that you disengage from us as a client we will as normal keep information in line with our storage and retention policy unless you specifically ask us to delete it. However, note that we will not automatically delete all of your information as the regulations require us to keep certain information for a minimum of a further 6 years.

### **Changes to this Policy**

JVCA has the discretion to update this privacy policy at any time without giving you notice or notifying you of any changes. The date of the latest change will be noted at the top of this policy. We encourage you to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and make yourself aware of any changes.

### **Contacting us**

If you have any questions, comments and requests regarding this Policy please contact us at [info@jvca.co.uk](mailto:info@jvca.co.uk)