



PRIVACY POLICY

Venetia Carpenter & Associates is committed to protecting and respecting your privacy. We handle your personal data with integrity and confidentiality, ensuring appropriate security measures are in place.

This policy together sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

1. Who are we?

This Privacy Policy applies to Venetia Carpenter & Associates.

2. Who can you contact for privacy questions or concerns?

If you have questions or comments about this Privacy Policy or how we handle personal data, please direct your correspondence to: Venetia Carpenter.

You may also contact the UK Information Commissioner's Office at <https://ico.org.uk/concerns/handling/> to report concerns you may have about our data handling practices.

3. How do we collect personal data?

- Directly

We obtain personal data directly from individuals in a variety of ways, including obtaining personal data from individuals who provide us their business card, complete our online forms, subscribe to our newsletters, register for webinars, attend meetings or events we host, visit our offices or apply for roles. We may also obtain personal data directly when, for example, we are establishing a business relationship or performing professional services through a contract.

- Indirectly

We obtain personal data indirectly about individuals from a variety of sources, including our clients. We may attach personal data to our records to better understand and serve our business clients and individuals, satisfy a legal or regulatory requirement, or pursue our legitimate interests.

Tilsden Oast, Tilsden Lane, Cranbrook, Kent, TN17 3PJ
Tel: 01580 714153 Mobile: 07971 560443
Email: info@vcassociates.co.uk www.vcassociates.co.uk

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- *Public sources* – personal data may be obtained from public registers (such as Companies House).
- *Business clients* – our business clients may engage us to perform professional services which involves sharing personal data they control as part of that engagement. For example, we may review Directors' details. Our services may also include processing personal data under our clients' control using third party software, which may be governed by different privacy terms and policies.
- *Recruitment services* – we may obtain personal data about candidates from an employment agency and other parties including former employers.

4. What categories of personal data do we collect?

We may obtain the following categories of personal data about individuals through direct interactions with us, or from information provided through client engagements, from applicants, our suppliers and through other situations including those described in this Privacy Policy.

- Personal data.
 - Contact details (e.g. name, company name, job title, work and mobile telephone numbers, work and personal email and postal address).
 - Professional details (e.g. job and career history).
 - Family and beneficiary details (e.g. names and dates of birth).
 - Financial information (e.g. taxes, payroll, investment interests, pensions, assets, bank details, insolvency records).
- Sensitive personal data. We typically do not collect sensitive or special categories of personal data about individuals. When we do need to process sensitive personal data, it is with the consent of the individual unless it is obtained indirectly for legitimate purposes. Examples of sensitive personal data we may obtain include:
 - Personal identification documents that may reveal race or ethnic origin, and possibly biometric data of private individuals, beneficial owners of corporate entities, or applicants.
 - Expense receipts submitted for individual tax or accounting advice that reveal affiliations with trade unions or political opinions.
 - Adverse information about potential or existing clients and applicants that may reveal criminal convictions or offences information.
 - Information provided to us by our clients during a professional engagement.
- Child data. We do not intentionally collect information from individuals under 13 years of age.

5. What lawful reasons do we have for processing personal data?

We may rely on the following lawful reasons when we collect and use personal data to operate our business and provide our products and services:

- Contract – we may process personal data to perform our contractual obligations.
- Consent – we may rely on your freely given consent at the time you provided your personal data to us.

- Legitimate interests – we may rely on legitimate interests based on our evaluation that the processing is fair, reasonable and balanced. These include:
 - *Delivering services to our clients* – to deliver the professional services our clients have engaged us to provide.
 - *Direct marketing* – to deliver timely market insights and speciality knowledge we believe is welcomed by our business clients, subscribers and individuals who have interacted with us.
- Legal obligations and public interests – we may process personal data to meet regulatory and public interest obligations or mandates.

6. Why do we need personal data?

- Providing professional advice and delivering reports related to our advisory, statutory, legal, company secretarial, pension scheme and share scheme administration, share administration, restructuring, mergers and acquisitions, mediation, and other professional services. Our services may include reviewing client company files for quality assurance purposes, which may involve processing personal data for the relevant client company.
- Promoting our professional services, products and capabilities to existing and prospective business clients.
- Complying with legal and regulatory obligations relating to countering money laundering, terrorist financing, fraud and other forms of financial crime.

7. Do we share personal data with third parties?

We may occasionally share personal data with trusted third parties to help us deliver efficient and quality services. These recipients are contractually bound to safeguard the data we entrust to them.

- Parties that support us as we provide our services (e.g., providers of telecommunication systems, mailroom support, IT system support, archiving services, document production services and cloud-based software services).
- Our professional advisers, including lawyers, accountants, chartered secretaries, auditors and insurers.
- A potential buyer, transferee, merger partner or seller and their advisers about an actual or potential transfer or merger/acquisition of part or all of our business or assets, or any associated rights or interests.
- Payment services providers.
- Marketing services providers.
- Law enforcement or other government and regulatory agencies (e.g., HMRC) and professional bodies or to other third parties as required by, and in accordance with, applicable law or regulation.
- Recruitment services providers.

8. What are your data protection rights?

Your data protection rights include, but are not limited to:

- Access – you can ask us to verify whether we are processing personal data about you, and if so, to provide more specific information.
- Correction – you can ask us to correct our records if you believe they contain incorrect or incomplete information about you.
- Erasure – you can ask us to delete your personal data after you withdraw your consent to processing or when we no longer need it for the purpose it was originally collected.
- Data portability – in some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another company if it is technically feasible.
- Right to Withdraw Consent – you can withdraw your consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or services to you and we will advise you if this is the case.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. This helps us to ensure that personal data is not disclosed to any person who has no right to receive it. No fee is required to make a request unless your request is clearly unfounded or excessive. Depending on the circumstances, we may be unable to comply with your request based on other lawful grounds.

To submit a data request please email info@vcassociates.co.uk.

9. What about personal data security?

We have put appropriate technical and organisational security policies and procedures in place to protect personal data (including sensitive personal data) from loss, misuse, alteration or destruction.

10. How long do we retain personal data?

We retain personal data to provide our services, stay in contact with you and to comply with applicable laws, regulations and professional obligations that we are subject to. Unless a different time frame applies because of business need or specific legal, regulatory or contractual requirements, where we retain personal data in accordance with these uses, we retain personal data for seven years. We will dispose of personal data in a secure manner when we no longer need it.

11. Do we change this privacy policy?

This Privacy Policy was last updated on 28 October 2018.