

PRIVACY POLICY

1. INTRODUCTION

This privacy notice provides you with details of how we collect and process your personal data.

Computare Limited trading as The John Doyle Partnership is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

We have appointed Kevin Doyle as Data Protection Officer who is in charge of privacy related matters for us. If you have any questions about this privacy notice, please contact the Data Protection Officer using the details set out below.

We are committed to safeguarding and preserving the privacy of all individuals.

Contact Details -

Full name of legal entity: Computare Limited trading as The John Doyle Partnership

Title of Data Protection Officer: Kevin Doyle, Director

The John Doyle Partnership, Marian House, 62-64 Priory Crescent, Southsea, Hampshire, PO4 8RN

Email address: info@thejohndoylepartnership.com

Telephone numbers: 023 9261 9999 / 023 9261 0450

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at info@thejohndoylepartnership.com

TEL 023 9261 0450 / 023 9261 9999

Directors: **A.S.Doyle** FMAAT,ACIPF **P.A.Brown** FMAAT, **K.F.Palframan** FMAAT, **K.M.Doyle** AFA MIPA, Chartered MCIPD

info@thejohndoylepartnership.com www.thejohndoylepartnership.com



ANDREW S DOYLE, PRUNELLA A BROWN AND KELLY F PALFRAMAN ARE LICENSED AND REGULATED BY THE ASSOCIATION OF ACCOUNTING TECHNICIANS TO PROVIDE SERVICES IN ACCORDANCE WITH LICENCE NUMBERS 0266, 7257 AND 5495. KEVIN M DOYLE IS LICENSED BY THE INSTITUTE OF FINANCIAL ACCOUNTANTS TO ENGAGE IN PUBLIC PRACTICE AS AN INCORPORATED FINANCIAL ACCOUNTANT. DETAILS OF WHICH ARE DISPLAYED AT THE ADDRESS SHOWN ABOVE.

COMPUTARE LIMITED, REGISTERED IN ENGLAND NO 3947837, REGISTERED OFFICE AS ABOVE.



2. WHAT DATA DO WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUNDS WE PROCESS THIS DATA

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

- **Communication Data** that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
- **Customer Data** that includes data relating to any purchases of services such as your name, title, billing address, delivery address email address, phone number, contact details. We process this data to supply the services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.
- **User Data** Our website does not collect individual user data.
- **Technical Data** that includes anonymous data about your use of our website and online services such as your IP address, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness, relevance and efficiency of our promotions. Our lawful ground

for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.

Where we are required to collect personal data by law, or under the terms of engagement between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to provide services to you). If you don't provide us with the requested data, we may have to cancel a service you have ordered but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at info@thejohndoylepartnership.com In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

We do not carry out automated decision making or any type of automated profiling.

3. HOW WE COLLECT YOUR PERSONAL DATA

We may collect data about you by you providing the data directly to us (for example by completing Anti-Money Laundering processes or during our initial meeting when we need to verify your identity).

We may automatically collect certain data from you such as when you telephone or e-mail us. This is to improve our quality of service by better communications.

We do not collect personal data through our website or through any other automatic source. Some anonymous data is collected but this only shows such information as pages visited and whether

the visitor is new or repeat. Your IP address is collected but we have no way of identifying an individual through this means.

We may also receive data from publicly available sources such as Companies House and HM Revenue & Customs.

4. MARKETING COMMUNICATIONS

We do not use your data for marketing purposes.

We will never share your personal data with any third party for their own marketing purposes.

5. DISCLOSURES OF YOUR PERSONAL DATA

We will never knowingly disclose your personal information to any third party other than in accordance with this Privacy Policy. We may have to share your personal data with the parties set out below:

- **Service providers** who provide IT and system administration services.
- **Professional advisers** including lawyers, bankers, auditors and insurers
- **Government bodies** that require us to report processing activities such as Companies House and HM Revenue and Customs.
- **Third parties** to whom we sell, transfer, or merge parts of our business or our assets.

If we were asked to submit information as part of a criminal investigation, we may be forced to disclose information.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We rarely transfer information outside of the United Kingdom. However if we do then the following will apply:

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Many of our third parties service providers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

We will only transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or

Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or

If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

7. DATA SECURITY

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We will do our utmost to ensure that all reasonable steps are taken to make sure that your data is treated and stored securely.

Unfortunately, the sending of information via the internet is not totally secure and on occasion such information can be intercepted. We cannot guarantee the security of data that you choose to send us electronically. Sending such information is entirely at your own risk. We recommend the use of zipped and passworded files.

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

8. DATA RETENTION

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

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers. After six years the data is securely destroyed by www.weshred4u.co.uk and/or deleted.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights>.

If you wish to exercise any of the rights set out above, please email us at info@thejohndoylepartnership.com

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 or refuse to comply with your request in these circumstances.

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.

We try to respond to all legitimate requests within four weeks. Occasionally it may take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

10. THIRD-PARTY LINKS

This 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.

Cookie Policy

A "cookie" is a piece of information that is stored on your computer's hard drive and which records how you move your way around a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes. Cookies are used by nearly all websites and do not harm your system.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. You can block cookies at any time by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

How do we use cookies?

We use cookies to track the use of our website. The information cannot identify you personally but it enables us to understand how our customers use the site and track any patterns with regards how they are using our website. This helps us to develop and improve our website as well as products and/or services in response to what you might need or want.

Cookies are either:

Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any personal data from your computer; or

Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again.

Cookies can also be categorised as follows:

Strictly necessary cookies: These cookies are essential to enable you to use the website effectively, such as when buying a product and / or service, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

Performance cookies: These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.

Functionality cookies: These cookies allow our website to remember choices you make and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.



Kevin Doyle

Director & Data Protection Controller