

# **J S Accounting Services Limited Privacy and Cookies Policy 2018**

J S Accounting Services Limited (company number SC349734, with our registered office at 13-15 Morningside Drive, Edinburgh, EH10 5LZ, or “we”, “us” or “our”) has created this privacy and cookies policy to demonstrate how we collect, use, disclose and store your data. This policy applies to clients, (including prospective clients and former clients) and suppliers of J S Accounting Services Limited. We have a separate privacy policy detailing how we handle employee data (including prospective employee/candidate and former employee/alumni).

## **1. General Terms**

J S Accounting Services Limited is committed to protecting your data whilst using our services. This Privacy and Cookies Policy relates to our use of any personal information we collect from you via:

- Meetings/discussions in person;
- Written correspondence including any letters, forms, business cards;
- Telephone calls;
- Fax notices;
- Emails;
- J S Accounting Services Limited Website and any connected websites;
- Any electronic data, e.g. mobile device or IP address; and
- Any cloud-based applications that we may use (for example J S Accounting Services Limited’s Client Cloud, Xero Accounting Software, Freeagent).

J S Accounting Services Limited is committed to safeguarding your personal information. Whenever you provide such information we are legally obliged to use your information in line with all applicable laws concerning the protection of personal information, including:

- Data Protection Act, 1998 (hereon in the “Act”) as amended or replaced (including in relation to the Regulations as defined below); and
- From 25 May 2018, the General Data Protection Regulations (hereon in the “Regulations”),

Together the “Applicable Laws”.

This statement sets out how we comply with the Applicable Laws. This

privacy policy sets out:

- Who we collect personal data on;
- What personal data is collected;
- How personal data is processed;
- Why we collect personal data and our legal basis for doing so; and
- What your legal rights are in regard to your personal data.

## **2. Who do we collect data on?**

We collect data on the following groups who are defined as “data subjects”:

### **2.1 J S Accounting Services Limited Clients, Prospective Clients and Former Clients**

We will collect and retain information about you in order to provide you with a full range of J S Accounting Services Limited services.

### **2.2 J S Accounting Services Limited Suppliers, Prospective Suppliers and Former Suppliers**

We may need to collect data on our suppliers or prospective suppliers with whom we have or are looking to enter into a commercial agreement for provision of services. For example, this includes our legal partners, agencies, contractors and subcontractors.

## **3. What types of data we collect?**

### **3.1 General Data Collection**

Under the Applicable Laws, “personal data” is defined as personal information that is connected to or can be identified as being connected to you as an individual (i.e. it can be used to identify you as a data subject). This may include a variety of personal information such as your name, date of birth, contact details including email address, postal address, telephone number, mobile phone number or financial details such as your bank account, your tax details or similar details for the Company for which you work or that you are connected with.

We may collect and store data about you when you:

- Become a client of J S Accounting Services Limited (after signing a Letter of Engagement that outlines our agreed services provided to you). This can consist of information such as the details above, plus proof of ID in order that we adhere to money laundering legislation, such as a passport and proof of address from a recent utility bill.
- Supply services to J S Accounting Services Limited. This can consist of information such as terms and conditions of payment of invoices, contact email address, telephone number or mobile phone number.
- Complete and send a form held on our website or use one of our services. This can consist of information such as your name, email address, postal address, telephone or mobile phone number, date of birth, gender, and information collected about what you would like us to keep in touch with you about e.g. events or sector updates.

J S Accounting Services Limited collects and stores information about how our online channels, such as our website and social media streams, are used by the public. This helps us to keep the content of our online information up to date and ensure it is relevant for users. We collect data on users including unique identifiers such as IP addresses, which are numbers that can uniquely identify a specific computer or other network device on the internet. IP addresses and device identifiers are used to identify the location of users. This helps us to establish the number of visits from different countries and it

determines whether you are accessing our services from the UK or not. The data may also be used for analysis and research purposes to improve services offered by J S Accounting Services Limited.

When you visit the J S Accounting Services Limited website you will see a pop up that enables you to view, read and accept this Privacy and Cookies Policy.

#### **4. How will J S Accounting Services Limited use your data and contact you?**

##### **4.1 J S Accounting Services Limited Clients, Prospective Clients and Former Clients**

We will use your personal data to contact you. You will normally be issued with a Letter of Engagement that outlines when and why we may contact you. After signing a Letter of Engagement (that outlines our agreed services provided to you), personal data retained by us can consist of information such as your name, date of birth, contact details including email address, postal address, telephone number, mobile phone number or financial details such as your bank account, your tax details or similar details for the Company for which you work or that you are connected with, plus proof of ID in order that we adhere to money laundering legislation, such as a passport and proof of address from a recent utility bill.

We may also contact you:

- In relation to a service, activity or registration you have signed up for, to ensure that J S Accounting Services Limited can deliver proactive services to you. We may use your personal data in this respect in order to properly perform under our contract with you. Please see 4.1 for details of personal data we may retain.
- In relation to any correspondence we receive from you, or any comment, or a complaint you make about J S Accounting Services Limited. We may use your personal data as you have requested and consented to our use in order to respond to your comment or complaint. Please see 4.1 for details of personal data we may retain.
- In relation to any personalised service you want to receive from J S Accounting Services Limited. We may use your personal data in this respect in order to properly perform under our contract with you. Please see 4.1 for details of personal data we may retain.
- To invite you to participate in surveys about J S Accounting Services Limited services (participation is always voluntary). We may use your personal data in this respect as part of our legitimate interest to provide the best service to you. Please see 4.1 for details of personal data we may retain.
- To update you on changes to legislation and regulation that we think would be helpful for you to know about. We may use your personal data in this respect in order to comply with our statutory obligations. Please see 4.1 for details of personal data we may retain.
- For marketing purposes. J S Accounting Services Limited will only send you marketing information if you have opted into receiving proactive information. We may personalise the information we send to you based on any information you have provided us. We may use your personal data in this respect as part of our legitimate interest to provide you with up to date information on the services we offer. Please see 4.1 for details of personal data we may retain.

## 4.2 J S Accounting Services Limited Suppliers, Prospective Suppliers and Former Suppliers

For any service providers, we process your personal data for proper performance of the supplier contract. We hold data on file for as long as necessary to perform the services required.

## 5. Other uses of your data

### 5.1 Further use of your data

We use your data for to communicate with you for business, regulatory and legal purposes, or in relation to completing tasks such as tax returns. We will also retain your data to get in touch with you about regulation and legislation that may affect you currently or in the future. We aim to personalise the information we share according to the things you have told us that you want to know about. We may use your personal data in this respect in order to comply with our statutory obligations and are legally obliged to keep information about your relationship with us for up to 7 years. If you decide to move to a new accountancy firm, your records will be shared with this new supplier in order that they can provide a service to you. We do not knowingly have any advertising from third party sites on our website.

We will never ask you for your password or other log in details to Client Cloud or any other cloud-based services we provide you. Please be cautious if you receive emails or calls from people asking for this information that claim to be from J S Accounting Services Limited. If you suspect any suspicious behaviour, please get in touch with your usual contact at J S Accounting Services Limited or email [mail@jsaccountingservices.co.uk](mailto:mail@jsaccountingservices.co.uk).

### 5.2 Changing your data

If you would like to change the data we have in connection with you, please amend your contact preferences by getting in touch with your usual J S Accounting Services Limited contact, or by emailing [mail@jsaccountingservices.co.uk](mailto:mail@jsaccountingservices.co.uk).

### 5.3 Deleting your data

If you would like us not to contact you in future (outside the scope of the Letter of Engagement), this option is always available to you. As outlined above, J S Accounting Services Limited is legally obliged to retain any information on the services we have provided to you for 7 years. If you would like us to stop contacting you with proactive communication for marketing purposes, please contact our Marketing Team at [mail@jsaccountingservices.co.uk](mailto:mail@jsaccountingservices.co.uk). Your client record will be changed to reflect your wish not to receive any future, proactive marketing information.

### 5.4 Other rights you have

You also have the right to:

- object to the processing of your personal data by J S Accounting Services Limited ;
- restrict the processing of your personal data by J S Accounting Services Limited ; and
- request that your data is transferred by J S Accounting Services Limited to a third party.

If you would like to exercise these rights connection with you, please get in touch with your usual J S Accounting Services Limited contact, or by emailing [mail@jsaccountingservices.co.uk](mailto:mail@jsaccountingservices.co.uk).

## **6. How to find out about the personal data J S Accounting Services Limited holds on you**

Under the Applicable Laws, you have the right to request a copy of the personal information J S Accounting Services Limited holds about you, to have any inaccuracies corrected and to have your personal data deleted. In order to provide this service to you we may request you to prove your identity. We will use all reasonable efforts consistent with our legal duty to supply, correct or delete personal information you on our files. If you are within the UK, please address requests and questions about this or any other question about our Privacy and Cookies Policy to Alison Miller, J S Accounting Services Limited Compliance Officer, J S Accounting Services Limited, 13-15 Morningside Drive, Edinburgh, EH10 5LZ. Forms of identification we may request could include:

- Driving licence;
- Birth certificate;
- Passport;
- Utility Bill (from the last 3 months); or
- Bank statement (from the last 3 months).

If you believe that we are mishandling your data, you may contact the Information Commissioners' Office to lodge a complaint.

## **7. Inappropriate or offensive content**

If you post or send content to J S Accounting Services Limited that is reasonably deemed to be offensive, inappropriate or objectionable anywhere on or to J S Accounting Services Limited websites or social media channels, or otherwise engage in any disruptive behaviour on any J S Accounting Services Limited services, we retain the right to remove such content and take appropriate action. Where J S Accounting Services Limited reasonably believes that you are or may be in breach of any relevant laws, for example on defamation of character or hate speech, J S Accounting Services Limited may disclose your personal information to relevant third parties, including to law enforcement agencies or your internet provider. We may and would only do so in circumstance where such disclosure is permitted under applicable laws, including data protection law.

## **8. Safeguarding (users aged under 18 years old)**

J S Accounting Services Limited does not provide content on our website or social media channels which is pitched for users under 18 years old.

If you are aged 18 or under and contact J S Accounting Services Limited in connection with a service, we will retain this information in accordance with the rules set out in this Policy.

## **9. Our use of web browser cookies**

A web-browser cookie (hereon in a "cookie"), is a small amount of data, which often includes a unique identifier that is sent to your computer, tablet or mobile phone (all referred to here as a 'device'), web browser from a website's computer and is stored on your device's hard drive. Each website can send its own cookie to your web browser if your browser's preferences allow it. Many websites do this whenever a user visits their website to track online user interactions. Similar technologies are also used within emails to understand whether the email has been read or if any links have been clicked. If you continue without changing your marketing preferences, we will assume that you are happy to

receive all cookies on the J S Accounting Services Limited website. The J S Accounting Services Limited website will ask you if you 'accept' our use of cookies. The cookies held on the J S Accounting Services Limited website record information about your online preferences and how you use our website. During the course of a visit to our website, the pages you view, along with a cookie, are downloaded to your device. Many websites do this because cookies enable us to find out whether the device has visited the website before. This is done on a repeat visit by checking to see, and finding, the cookie left there on the last visit.

#### 9.1 How we use cookies

The information supplied to us from the J S Accounting Services Limited website primarily via Google Analytics, helps us to understand the profile of people that visit our website and to provide a better user experience. J S Accounting Services Limited uses this information as part of our legitimate interests to help us improve our services to users. Google Analytics collects data about user behaviour for their own purposes. J S Accounting Services Limited does not control this. For more information about how Google uses information, please visit their website here - <https://www.google.com/policies/privacy/partners/>.

#### 9.2 Third party cookies

During a visit to the J S Accounting Services Limited website, you may notice some cookies that are not related to J S Accounting Services Limited. JS Accounting Services does not control the dissemination of these cookies and you should check with the relevant third-party websites for more information.

#### 9.3 Do not track (DNT) browser setting

DNT is a feature offered by some browsers which, when enabled, sends a signal to websites to request that your website browsing is not tracked, such as by third party ad networks, social networks and analytic companies. The J S Accounting Services Limited website does not currently respond to DNT requests.

### **10. Changes to our Privacy and Cookie Policy**

J S Accounting Services Limited may change or update our Privacy and Cookie Policy from time to time. We will update you on any changes we make to this policy through our website or via email. The date of revisions will appear at the bottom of this information. If you do not agree to these changes, please do not use the J S Accounting Services Limited website to submit personal information. You can also change your mailing preferences at any time by getting in touch with your usual J S Accounting Services Limited contact or by mail@jsaccountingservices.co.uk

We operate based on the understanding that no website is 100% secure.

If you are at all concerned that the data you have provided to J S Accounting Services Limited is compromised, please contact us immediately. This includes any data which you have provided by the Client Cloud and any instances where this data may have been compromised, e.g. your password has been misplaced.

If you have any general comments or questions about the J S Accounting Services Limited Privacy and Cookies Policy, please contact our Marketing team on:

Email: [mail@jsaccountingservices.co.uk](mailto:mail@jsaccountingservices.co.uk)

Mail: Marketing, J S Accounting Services Limited, 13-15 Morningside Drive, Edinburgh, EH10 5LZ

In the interests of data protection and security, any concerns that you report may be raised with our Data Protection Officer (DPO) and our Compliance Team which includes the following persons:

**Data Protection Officer:**

Alison Miller, Senior Partner