

# Privacy Policy

## 1. INTRODUCTION

This privacy notice provides you with details of how we collect and process your personal data through your use of our site <https://www.poundlane.co.uk/> (including any information you may provide through our sites when you purchase a product or service or take part in a prize draw or competition) and our services.

Susie Kevern is registered with the ICO as a data controller and is responsible for your personal data (referred to as "we", "us" or "our" in this privacy notice).

### Contact Details

Our full details are:

Full name of legal entity: **Susie Kevern T/A Pound Lane Financial Management.**

Email address: [susie@poundlane.co.uk](mailto:susie@poundlane.co.uk)

Postal address: **Lower Loveham, High Bickington, Umberleigh, Devon EX37 9AU**

Telephone number: **07801 199671**

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 [susie@poundlane.co.uk](mailto:susie@poundlane.co.uk)

## 2. WHAT DATA DO WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUND WE PROCESS IT

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 websites; through email; in the form of a business card or letterhead; text; social media messaging; social media posting; or any other communication that you send us. We process this data for the purposes of communicating information about business accounting that might be valuable for 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 sending you useful information about how you can use accounting information in your business, 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 goods and/or services such as your name, title, company name, billing address, delivery address,

email address, phone number, contact details, purchase details and your bank or card details. We process this data to supply the goods and/or 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. We may also use Customer Data to telephone, text, email and send you postal (direct mail), to ensure you are fully aware of our terms and conditions, and any other information we deem necessary to fulfill our contract with you.

During the course of any professional engagement, and for a period of five years after any engagement ends, we may collect personal data relating to your tax affairs, bank accounts, investments, payroll information, accounting records and other statutory returns. We will require documentary details from you such as a driving licence, passport or birth certificate in order to comply with our obligations under identification, money laundering and anti-terrorism legislation.

- **Supplier Data** that includes data relating to any goods or services that you supply our company, such as your name, title, company name, billing address, delivery address, email address, phone number, contact details, and your bank or card details. We process this data to pay you for the supply of goods or services you have given us 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. We may also use Supplier Data to telephone, text, email and send you postal (direct mail), to ensure you are fully aware of our terms and conditions, and any other information we deem necessary to fulfill our contract with you.
- **Technical Data** that includes data about your use of our website and online services such as your IP address, your login data, 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 content and advertisements to you and to understand the effectiveness of our advertising. 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.

## Sensitive Data

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

Where we are required to collect personal data by law, or under the terms of the contract 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 deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered.

We will only use your personal data for a purpose it was collected for. 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.

### **3. HOW WE COLLECT YOUR PERSONAL DATA**

We will collect data directly from you during telephone conversations, from email, business cards or letterheads, text messaging, social media or from anyone else that you give permission to provide such information required to communicate with us. We may also collect payment data from telephone conversations, BACS transfers or from our website.

### **4. MARKETING COMMUNICATIONS**

You may receive marketing communications from us if you made a purchase or asked for information from us about our goods or services or if you are not a customer, you gave us your details on a business card, or agreed to receive marketing communications by ticking a box. In each case, you can ask us to stop sending you marketing messages at any time by emailing [susie@poundlane.co.uk](mailto:susie@poundlane.co.uk).

We never share your personal data for marketing reasons.

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, etc.

### **5. DISCLOSURES OF YOUR PERSONAL DATA**

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.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

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

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 party 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.

## 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 and Anti Money Laundering 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.

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 [susie@poundlane.co.uk](mailto:susie@poundlane.co.uk).

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](http://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

Our 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.

## 11. WEBSITE INFORMATION

### Cookies

If you leave a comment on our website(s) you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

This site uses analytics services provided by Google Analytics which also uses cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how people use our site.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies.

### **Embedded content from other websites**

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracing your interaction with the embedded content if you have an account and are logged in to that website.

### **Analytics**

#### **How long we retain your data**

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognize and approve any follow-up comments automatically instead of holding them in a moderation queue.

For users that register on our website, we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

#### **What rights you have over your data**

If you have an account on this site, or have left comments, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

#### **Where we send your data**

Visitor comments may be checked through an automated spam detection service.

## **12. CONTACTING US**

If you have any questions about our site or this Privacy Policy, please contact us by email at [susie@poundlane.co.uk](mailto:susie@poundlane.co.uk), by telephone on 07801 199671, or by post at Lower Loveham, High Bickington, Devon EX37 9AU. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you (as under section 11, above).

## **13. CHANGES TO OUR PRIVACY POLICY**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on this site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of the site following the alterations. We recommend that you check this page regularly to keep up-to-date.