



PRIVACY NOTICE ('NOTICE')

This notice will tell you how we look after your personal data, about your privacy rights, and about our compliance with and your protections under Data Protection Legislation.

1 PURPOSE OF THIS NOTICE

- 1.1 In this notice "Data Protection Legislation" means any applicable law relating to the processing, privacy and use of personal data, including the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended by The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020.

2 ABOUT US

- 2.1 Morris Lane is the trading name of Roger Morris, with offices at 31/33 Commercial Road, Poole, Dorset, BH14 0HU, providing accountancy and tax advisory services.
- 2.2 Morris Lane is registered to carry on audit work in the UK and regulated for a range of investment business activities by ICAEW.
- 2.3 Any reference throughout this notice to "firm", "we", "our", and any other collective noun describing the practice, means Morris Lane.
- 2.4 For the purpose of the Data Protection Legislation and this notice, we are the 'data controller'. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this notice.
- 2.5 We have appointed a Data Protection Manager. Our Data Protection Manager is our Data Protection Point of Contact and is responsible for assisting with enquiries in relation to this notice or our treatment of your personal data. Should you wish to contact our Data Protection Point of Contact you can do so using the contact details noted at paragraph 13 below.

3 HOW WE MAY COLLECT YOUR PERSONAL DATA

- 3.1 We obtain your personal data directly from you, for example:-
- when you request a proposal from us in respect of the services we provide;
 - when you engage us to provide our services, and also during the provision of those services; and
 - when you contact us by email, telephone or post (for example when you have a query about our services).
- 3.2 We may also obtain your personal data indirectly, for example:-
- from our client when it engages us to provide services, and also during the provision of those services;

- from third parties or publicly available resources (for example, from your employer or from Companies House);
- from your interaction with our website via cookies and other similar technologies. Please see section 11 for further details;
- from analytics providers such as Google and search information providers such as Google, Bing and Yahoo; and
- usage data from analytics providers such as Google.

4 THE KIND OF INFORMATION WE HOLD ABOUT YOU

4.1 Personal data, or personal information, means any information about an individual from which the person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you as follows:-

- identity information such as your first name, maiden name, last name, marital status, title, date of birth, gender, pension details, tax codes, National Insurance numbers and salary/income details;
- contact information, which includes your address, email address and telephone numbers;
- financial and transactional information including your bank account details and details about payments to and from you, and other details of services we have provided to you;
- details of contact we have had with you in relation to the provision or proposed provision of our services;
- our correspondence and communications with you;
- information about any complaints and enquiries you make to us;
- information from research, surveys and marketing activities;
- information we receive from other sources, such as publicly available information, information received from your employer or our clients;
- website usage data, including technical and usage data about your equipment, browsing actions and patterns. We collect this personal data by including information about how you use our website, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call us;
- analytics data, including the internet protocol (IP) address used to connect your computer to the internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- marketing and communications information, including your preferences in receiving marketing from us and your communication preferences; and
- data required to carry out any transaction following an instruction to act on your behalf.

5 HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU

5.1 We may process your personal data for purposes necessary for the performance of our contract with our clients and to comply with our legal obligations. This may include processing your personal data where you are an employee, subcontractor, supplier or customer of our client.

5.2 We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.

5.3 Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

Situations in which we will use your personal data

- 5.4 We may use your personal data in order to:-
- carry out our obligations arising from any agreements entered into between you and us (which will most usually be for the provision of our services);
 - carry out our obligations arising from any agreements entered into between our clients and us (which will most usually be for the provision of our services) where you may be a subcontractor, supplier or customer of our client;
 - provide you with information related to our services and our events and activities that you request from us or which we feel may interest you;
 - seek your thoughts and opinions on the services we provide; and
 - notify you about any changes to our services.
- 5.5 In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.
- 5.6 Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you.
- 5.7 We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.
- 5.8 You have the right to withdraw consent to marketing at any time by contacting us.
- 5.9 We do not sell your personal data to third parties for marketing purposes.
- 5.10 Your data will not be used by Morris Lane in relation to automatic decision-making and profiling.
- 5.11 To comply with anti-money laundering regulations, we may undertake an online search using details you supply. The search uses fraud and credit reference agencies to supply relevant data from various databases (public or otherwise) in order to verify your identity, and those of other shareholders, members, trustees, partners, directors and other individuals connected to the client, as well as beneficial owners of the entity if applicable. A record of the fact that a search has taken place will remain visible to enquirers. The search company will retain a record of the search and they may also use your details in the future to assist other companies for verification purposes.

Data retention

- 5.12 We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.
- 5.13 When assessing what retention period is appropriate for your personal data, we take into consideration:-
- the requirements of our business and the services provided;
 - any statutory or legal obligations; and
 - the purposes for which we originally collected the personal data.

Change of purpose

- 5.14 Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose. If we need to use your personal data for a new purpose, we will notify you and communicate our legal basis for this new processing.

6 DATA SHARING

External third parties

- 6.1 We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so. This may include sharing your personal data with a regulator or to otherwise comply with the law.
- 6.2 “Third parties” includes third-party service providers. The following activities are carried out by third-party service providers: IT and cloud services, professional advisory services (including capital allowances and research and development claims), administration services, marketing services, professional indemnity insurance and banking services.
- 6.3 All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.
- 6.4 We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with the law.

7 TRANSFERRING PERSONAL DATA OUTSIDE THE UNITED KINGDOM (UK)

- 7.1 We will not transfer the personal data we collect about you outside of the UK, unless our client is based outside of the UK.

8 DATA SECURITY

- 8.1 We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- 8.2 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9 RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

- 9.1 It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

Your rights in connection with personal data

- 9.2 Under certain circumstances, by law you have the right to:-
- request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully;
 - request correction of the personal data that we hold about you;
 - request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to

ask us to delete or remove your personal data where you have exercised your right to object to processing (see below);

- object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis. You also have the right to object where we are processing your personal information for direct marketing purposes;
- request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it;
- request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

9.3 If you want to exercise any of the above rights, please email our Data Protection Point of Contact using the contact details at section 13.

9.4 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 for the administrative costs of complying with the request if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

9.5 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 is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

10 RIGHT TO WITHDRAW CONSENT

10.1 In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Protection Point of Contact using the contact details at section 13.

10.2 Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

11 COOKIES

11.1 Our website uses cookies. A cookie is a small text file stored in your computer containing text data. We use cookies for certain functions to improve the usability of the website. These cookies do not contain any personal information about you. However, enabling cookies in your web browser is necessary if you wish your selections to be remembered for future visits on the same computer. You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. For more information about cookies and instructions on how to adjust your browser settings to restrict or disable cookies, see www.allaboutcookies.org. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

12 CHANGES TO THIS NOTICE

12.1 Any changes we may make to our privacy notice in the future will be updated on our website at: www.morrislane.co.uk

12.2 This notice was last updated on 12 July 2022.

13 CONTACT US

- 13.1 If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please contact our Data Protection Point of Contact Malcolm Baker via email at malcolm.baker@morrislane.co.uk or by telephone on 01202 715950.
- 13.2 You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:-

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone - 0303 123 1113 (local rate) or 01625 545 745

Website - <https://ico.org.uk/make-a-complaint/>