

Data Protection Policy Notice to Clients

M.J.Kane & Company Accountants Ltd, EFFECTIVE 09TH SEPTEMBER 2018

We respect your trust in us to use, store and share your information. In this notice, we explain how we collect personal information about you, how we use it and how you can interact with us about it.

We try to keep this notice as simple as possible but if you are unfamiliar with our terms, or want more detail on any of the information here, please see our contact details at <http://mjkane.co.uk/>. You can also ask your M.J.Kane & Company Accountants contact for more details.

1. WHO WE ARE

In this notice, 'we', 'us' and 'our' refers to M.J.Kane & Company Accountants. M.J.Kane & Company Accountants is both a partnership and an unlimited company registration number NI063933, whose registered office is situate at 2 Market Place, Carrickfergus, Co. Antrim, Northern Ireland, BT38 7AW, which is regulated by ACCA. Under GDPR (EU General Data Protection Regulation) we are a data controller of the personal data we hold and process.

We share your information with colleagues in M.J.Kane to help us provide our services, comply with regulatory and legal requirements and improve our service levels.

2. DATA PROTECTION OFFICER

Our Data Protection Officer oversees how we collect, use, share and protect your information to ensure your rights are fulfilled.

3. HOW WE COLLECT INFORMATION ABOUT YOU

We collect personal information from you, for example, when you instruct us to provide a service. We also collect information through our website, apps, social media, discussion forums, market research and CCTV footage. We record all phone conversations for lawful business purposes including confirmation of and clarity of your instructions and the training of our staff.

Our website uses 'cookie' technology. A cookie is a little piece of text that our server places on your device when you visit our website or apps. They help us make the site work better for you.

When you, or a partner or colleague on your behalf, instruct us to provide a service, and during the time you avail of our services, we carry out information searches and verify your identity. We do this by sending and receiving information about you to and from third parties including reference and fraud prevention agencies. We and these agencies may keep records of our searches whether or not the service goes ahead.

4. HOW WE KEEP YOUR INFORMATION SAFE

We protect your information with security measures under the laws that apply and we meet UK standards. We keep our computers, files and buildings secure.

When you contact us to ask about your information, we may ask you to identify yourself. This is to help protect your information.

5. HOW LONG WE KEEP YOUR INFORMATION

To meet our legal and regulatory obligations we hold your information while you are a client and for a period of time after that. We do not hold it for longer than necessary.

6. MEETING OUR LEGAL AND REGULATORY OBLIGATIONS

To use your information lawfully, we rely on one or more of the following legal bases:

- performance of a contract;
- legal obligation;
- protecting the vital interests of you or others;
- public interest;
- our legitimate interests; and
- your consent.

To meet our regulatory and legal obligations, we collect some of your personal information, verify it, keep it up to date through regular checks and delete it once we no longer have to keep it. We may also gather information about you from third parties to help us meet our obligations. If you do not provide the information we need, or help us keep it up to date, we may not be able to provide you with our services.

7. CONSENT

Sometimes we need your consent to use your personal information. We, for example, need your consent to make you aware of services which may be of interest to you. We may do this by our client care letters, terms of business, phone, post, email, text or through other digital media.

You can decide how much of this information about our other services you want to accept when you apply for new services. If we ever contact you to get your feedback on ways to improve our services you have the choice to opt out.

When we use sensitive personal information about you we ask for your consent. Before you give your consent, we tell you what information we collect and what we use it for. You can remove your consent at any time by contacting us.

8. HOW WE USE YOUR INFORMATION

We use information about you to:

- provide relevant services;
- identify ways we can improve our services;
- maintain and monitor our services;
- protect both your & our interests & the interests of others;
- meet our legal and regulatory obligations; and
- decide and recommend how our services might be suitable for you.

To provide our services under the terms and conditions we agree between us we need to collect and use personal information about you. If you do not provide this personal information, we may not be able to provide you with our services.

We analyse the information that we collect on you through your use of our services and on our social media, apps and websites. This helps us understand how we interact with you and our position in the market place. Examples of how we use this information include helping protect you and others from financial crime, offering you services and personalising your experience.

We may report trends we see to third parties. These trend reports may include information such as the efficiency & speed of our services and the average time taken for different types of legal matters. When we prepare these reports we group clients information and remove any names. We do not share information in these reports that can identify you as a client, such as your name, or other details.

9. YOUR INFORMATION AND THIRD PARTIES

Sometimes we share your information with third parties. For example to:

- provide services and information;
- analyse information;
- research your experiences dealing with us;
- collect debts;
- sell whole or part of our business;
- prevent financial crime;
- trace information;
- protect both your & our interests;
- the general public if you contribute to a public forum;
- our business partners such as our IT providers, search agents, barristers, and experts advising on aspects of your case; and
- law enforcement officials, government authorities and other third parties to meet our legal obligations.

In order to process your instructions we will supply your personal information to reference agencies and they will verify & give us information about you. We do this to check your identity, prevent criminal activity and speed up the services we provide to you.

Your data will also be linked to the data of your spouse, any other persons or parties who jointly instruct us or relatives or friends who you, or they, have recommended our services and to your financial associates.

The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected you could be refused certain services. Further details of these agencies and how they process your information can be found at our websites. We expect these third parties to have the same levels of information protection that we have.

We also have to share information with third parties to meet any applicable law, regulation or lawful request. When we believe we have been given false or misleading information, or we suspect criminal activity, we must record this and tell law enforcement agencies, which may be either in or outside the UK.

10. INTERNATIONAL TRANSFERS OF DATA

We may transfer your personal information outside of the European Economic Area (EEA). If, for example, you are purchasing property from a USA company that is governed by USA or local stock exchange regulation we must pass information verifying your identity to the seller's solicitor who will pass it on to their USA client. We expect the same standard of data protection is applied outside the EEA to any such transfer and the use of the information to ensure your rights are protected.

11. YOUR PERSONAL INFORMATION RIGHTS

You will find information about your rights, when they apply and our responsibility to you on our websites Frequently Asked Questions section.

You can exercise your rights by calling into our offices, using email or our social media channels, phoning or writing to us. Please make your instructions clear when exercising your rights.

We can help you with:

- Accessing your personal information:

You can ask us for a copy of the personal information we hold. You can ask us about how we collect, share and use your personal information.

- Updating and correcting your personal details.

- Removing consent:

You can change your mind wherever you give us your consent.

- Restricting and objecting:

You may have the right to restrict or object to us using your personal information.

- Deleting your information (your right to be forgotten).

You may ask us to delete your personal information.

- Moving your information (your right to Portability).

Where possible we can share a digital copy of your information directly with you or another organisation.

When you contact us to ask about your information, we may ask you to identify yourself. This is to help protect your information.

We generally do not charge you when you contact us to ask about your information. If requests are deemed excessive or manifestly unfounded we may charge a reasonable fee to cover the additional administrative costs or choose to refuse the request.

12. MAKING A COMPLAINT

If you have a complaint about the use of your personal information, please let a member of staff in our office know, giving them the opportunity to put things right as quickly as possible. If you wish to make a complaint you may do so in person, by telephone, in writing and by email. Please be assured that all complaints received will be fully investigated. You can register a complaint by our website, by phone,

by email or in person at our offices. We ask that you supply as much information as possible to help our staff resolve your complaint quickly.

You can also contact the Information Commissioner's Office at www.ico.org.uk.

13. UPDATES TO THIS NOTICE

We will make changes to this notice from time to time, particularly when we change how we use your information, and change our technology and services.

You can always find an up-to-date version of this notice on our website at <http://mjkane.co.uk/>