

Introduction

Circa Accountants Ltd ("Circa", "we", "us", or "our") is strongly committed to protecting personal data. This privacy statement describes why and how we collect and use personal data and provides information about individuals' rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this privacy statement or as otherwise stated at the point of collection.

Personal data is any information relating to an identified or identifiable living person. Circa processes personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

When collecting and using personal data, our policy is to be transparent about why and how we process personal data. To find out more about our specific processing activities, please go to the relevant sections of this statement.

Business contacts

Circa processes personal data about contacts (existing and potential Circa clients and/or individuals associated with them)

The collection of personal data about contacts and the addition of that personal data will include name, employer name, contact title, phone, email and other business contact details. In addition, Circa may collect data from Circa email (sender name, recipient name, date and time) and calendar (organiser name, participant name, date and time of event) systems concerning interactions between Circa users and contacts or third parties.

Use of personal data

Personal data relating to business contacts may be visible to and used by Circa users to learn more about an account, client or opportunity they have an interest in, and may be used for the following purposes:

- Administering, managing and developing our businesses and services
- Providing information about us and our range of services
- Making contact information available to Circa users
- Identifying clients/contacts with similar needs
- Describing the nature of a contact's relationship with Circa
- Performing analytics, including producing metrics for Circa leadership, such as on trends, relationship maps, sales intelligence and progress against account business goals

Data retention

Personal data will be retained on the Circa servers for as long as it is necessary for the purposes set out above (e.g. for as long as we have, or need to keep a record of, a relationship with a business contact).

Corporate clients (and individuals associated with our corporate clients)

Our policy is to collect only the personal data necessary for agreed purposes and we ask our clients to only share personal data where it is strictly needed for those purposes.

Where we need to process personal data to provide professional services, we ask our clients to provide the necessary information to the data subjects regarding its use. Our clients may use relevant sections of this privacy statement or refer data subjects to this privacy statement if they consider it appropriate to do so.

Generally, we collect personal data from our clients or from third parties acting on the instructions of the relevant client.

Use of personal data

We use personal data for the following purposes:

- **Providing professional services**

We provide a diverse range of professional services. Some of our services require us to process personal data in order to provide advice and deliverables. For example, we will review payroll data as part of an audit and we often need to use personal data to provide global mobility and pensions services.

- **Administering, managing and developing our businesses and services**

We process personal data in order to run our business, including:

- managing our relationship with clients;
- developing our businesses and services (such as identifying client needs and improvements in service delivery);
- maintaining and using IT systems;
- hosting or facilitating the hosting of events; and
- administering and managing our website and systems and applications.

- **Security, quality and risk management activities**

We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We monitor the services provided to clients for quality purposes, which may involve processing personal data stored on the relevant client file. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to client engagements. We collect and hold personal data as part of our client engagement and acceptance procedures. As part of those procedures we carry out searches using publicly available sources (such as internet searches and sanctions lists) to identify politically exposed persons and heightened risk individuals and organisations and check that there are no issues that would prevent us from working with a particular client (such as sanctions, criminal convictions (including in respect of company directors), conduct or other reputational issues).

- **Providing our clients with information about us and our range of services**

Unless we are asked not to, we use client business contact details to provide information that we think will be of interest about us and our services. For example, industry updates and insights, other services that may be relevant and invites to events.

- **Complying with any requirement of law, regulation or a professional body of which we are a member**

As with any provider of professional services, we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

We are continually looking for ways to help our clients and improve our business and services. Where agreed with our clients, we may use information that we receive in the course of providing professional services for other lawful purposes, including analysis to better understand a particular issue, industry or sector, provide insights back to our clients, to improve our business, service delivery. To the extent that the information we receive in the course of providing professional services contains personal data, we will de-identify the data prior to using the information for these purposes.

Data retention

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for records and other documentary evidence created in the provision of services is 8 years.

Personal clients

Our policy is to collect only the personal data necessary for agreed purposes and we ask our clients only to share personal data where it is strictly needed for those purposes.

Where we need to process personal data to provide our services, we ask our clients to provide the necessary information to other data subjects concerned, such as family members, regarding its use. Given the diversity of the services we provide to personal clients, we process many categories of personal data, including as appropriate for the services we are providing:

- Contact details;
- Business activities;
- Family information;
- Income, taxation and other financial-related details; and
- Investments and other financial interests.

For certain services or activities, and when required by law or with an individual's consent, we may also collect special categories of personal data. Examples of special categories include race or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; physical or mental health; genetic data; biometric data; sexual life or sexual orientation; and, criminal records.

Generally, we collect personal data from our clients or from a third party acting on the instructions of the relevant client.

Use of personal data

We use personal data for the following purposes:

- **Providing professional services**
We provide a diverse range of professional services. Some of our services require us to process personal data in order to provide advice and deliverables. For example, we need to use personal data to provide individual tax advice, immigration services or pensions advice.
- **Administering, managing and developing our businesses and services**
We process personal data in order to run our business, including:
 - managing our relationship with clients;
 - developing our businesses and services (such as identifying client needs and improvements in service delivery);
 - maintaining and using IT systems;
 - hosting or facilitating the hosting of events; and
 - administering and managing our website and systems and applications.
- **Security, quality and risk management activities**
We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We monitor the services provided to clients for quality purposes, which may involve processing personal data stored on the relevant client file. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to client engagements. We collect and hold personal data as part of our client engagement and acceptance procedures. As part of our client and engagement acceptance, we carry out searches using publicly available sources (such as internet searches and sanctions lists) to identify politically exposed persons

and heightened risk individuals and organisations and check that there are no issues that would prevent us from working with a particular client (such as sanctions, criminal convictions (including in respect of company directors), conduct or other reputational issues).

- **Providing our clients with information about us and our range of services**

With consent or otherwise in accordance with applicable law, we use client contact details to provide information that we think will be of interest about us and our services. For example, industry updates and insights, other services that may be relevant and invites to events.

- **Complying with any requirement of law, regulation or a professional body of which we are a member**

As with any provider of professional services, we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

We are continually looking for ways to help our clients and improve our business and services. Where agreed with our clients, we may use information that we receive in the course of providing professional services for other lawful purposes, including analysis to better understand a particular issue, industry or sector, provide insights back to our clients, to improve our business, service delivery and offerings and to develop new Circa technologies and offerings. To the extent that the information that we receive in the course of providing professional services contains personal data, we will de-identify the data prior to using the information for these purposes.

Data retention

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for records and other documentary evidence created in the provision of services is 8 years.

Individuals whose personal data we obtain in connection with providing services to our clients

Our policy is to collect only the personal data necessary for agreed purposes and we ask our clients only to share personal data where it is strictly needed for those purposes.

Where we need to process personal data to provide our services, we ask our clients to provide the necessary information to the data subjects concerned regarding its use.

We collect and use contact details for our clients in order to manage and maintain our relationship with those individuals. Please see the [Business contacts](#) section of this privacy statement for more information about our processing of this type of data.

Given the diversity of the services we provide to clients, we process many categories of personal data, including:

- Contact details;
- Business activities;
- Information about management and employees;
- Payroll and other financial-related details; and

Use of personal data

We use personal data for the following purposes:

- **Providing professional services**

We provide a diverse range of professional services. Some of our services require us to process personal data in order to provide advice and deliverables. For example, we will review payroll data as part of an audit and we often need to use personal data to provide global mobility and pensions services.

- **Administering, managing and developing our businesses and services**

We process personal data in order to run our business, including:

- managing our relationship with clients;
- developing our businesses and services (such as identifying client needs and improvements in service delivery);
- maintaining and using IT systems;
- hosting or facilitating the hosting of events; and
- administering and managing our website and systems and applications.

- **Security, quality and risk management activities**

We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We monitor the services provided to clients for quality purposes, which may involve processing personal data stored on the relevant client file. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to client engagements. We collect and hold personal data as part of our client engagement and acceptance procedures. As part of our client and engagement acceptance, we carry out searches using publicly available sources (such as internet searches and sanctions lists) to identify politically exposed persons and heightened risk individuals and organisations and check that there are no issues that would prevent us from working with a particular client (such as sanctions, criminal convictions (including in respect of company directors), conduct or other reputational issues).

- **Complying with any requirement of law, regulation or a professional body of which we are a member**

As with any provider of professional services, we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

We are continually looking for ways to help our clients and improve our business and services. Where agreed with our clients, we may use information that we receive in the course of providing professional services for other lawful purposes, including analysis to better understand a particular issue, industry or sector, provide insights back to our clients, to improve our business, service delivery and offerings and to develop new Circa technologies and offerings. To the extent that the information that we receive in the course of providing professional services contains personal data, we will remove the personal data prior to using the information for these purposes.

Data retention

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for records and other documentary evidence created in the provision of services is 8 years.

Recruitment applicants

When applying online for a role at Circa via the Circa careers website, applicants should refer to the information made available when applying for a job for details about why and how personal data is collected and processed

Suppliers (including subcontractors and individuals associated with our suppliers and subcontractors)

We collect and process personal data about our suppliers (including subcontractors and individuals associated with our suppliers and subcontractors) in order to manage the relationship, contract, to receive services from our suppliers and, where relevant, to provide professional services to our clients.

Use of personal data

We use personal data for the following purposes:

- **Receiving services**
We process personal data in relation to our suppliers and their staff as necessary to receive the services. For example, where a supplier is providing us with facilities management or other outsourced services, we will process personal data about those individuals that are providing services to us.
- **Providing professional services to clients**
Where a supplier is helping us to deliver professional services to our clients, we process personal data about the individuals involved in providing the services in order to administer and manage our relationship with the supplier and the relevant individuals and to provide such services to our clients (for example, where our supplier is providing people to work with us as part of a Circa team providing professional services to our clients).
- **Administering, managing and developing our businesses and services**
We process personal data in order to run our business, including:
 - managing our relationship with suppliers;
 - developing our businesses and services (such as identifying client needs and improvements in service delivery);
 - maintaining and using IT systems;
 - hosting or facilitating the hosting of events; and
 - administering and managing our website and systems and applications.
- **Security, quality and risk management activities**
We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal data as part of our supplier contracting procedures. We monitor the services provided for quality purposes, which may involve processing personal data.
- **Providing information about us and our range of services**
Unless we are asked not to, we use business contact details to provide information that we think will be of interest about us and our services. For example, industry updates and insights, other services that may be relevant and invites to events.
- **Complying with any requirement of law, regulation or a professional body of which we are a member**
As with any provider of professional services, we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

Data retention

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

Personal data may be held for longer periods where extended retention periods are required by law or regulation and in order to establish, exercise or defend our legal rights.

Visitors to our website

Visitors to our websites are generally in control of the personal data shared with us. We may capture limited personal data automatically via the use of cookies on our website. Please see the **section on Cookies** below for more information.

We receive personal data, such as name, title, company address, email address, and telephone and fax numbers, from website visitors; for example when an individual subscribes to updates from us. Visitors are also able to send an email to us through the website. Their messages will contain the user's screen name and email address, as well as any additional information the user may wish to include in the message.

We ask that you do not provide sensitive information (such as race or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; physical or mental health; genetic data; biometric data; sexual life or sexual orientation; and, criminal records) to us when using our website; if you choose to provide sensitive information to us for any reason, the act of doing so constitutes your explicit consent for us to collect and use that information in the ways described in this privacy statement or as described at the point where you choose to disclose this information.

Cookies

We use small text files called 'cookies' which are placed on your hard drives to assist in personalising and enriching your browsing experience by displaying content that is more likely to be relevant and of interest to you. The use of cookies is now standard operating procedure for most websites. However if you are uncomfortable with the use of cookies, most browsers now permit users to opt-out of receiving them. You need to accept cookies in order register on our website. You may find other functionality in the website impaired if you disable cookies. After termination of the visit to our site, you can always delete the cookie from your system if you wish.

Use of personal data

When a visitor provides personal data to us, we will use it for the purposes for which it was provided to us as stated at point of collection (or as obvious from the context of the collection). Typically, personal data is collected to:

- register for certain areas of the site;
- subscribe to updates;
- enquire for further information;
- distribute requested reference materials;
- submit curriculum vitae;
- monitor and enforce compliance with our terms and conditions for use of our website;
- administer and manage our website, including confirming and authenticating identity and preventing unauthorised access to restricted areas, premium content or other services limited to registered users; and
- aggregate data for website analytics and improvements.

Unless we are asked not to, we may also use your data to contact you with information about Circa's business, services and events, and other information which may be of interest to you. Should visitors subsequently choose to unsubscribe from mailing lists or any registrations, we will provide instructions on the appropriate webpage, in our communication to the individual, or the individual may contact us by email to info@circaaccountants.co.uk.

Our websites do not collect or compile personal data for the dissemination or sale to outside parties for consumer marketing purposes or host mailings on behalf of third parties. If there is an instance where such information may be shared with a party that is not a Circa member firm, the visitor will be asked for their consent beforehand.

Data retention

Personal data collected via our websites will be retained by us for as long as it is necessary (e.g. for as long as we have a relationship with the relevant individual).

Security

We take the security of all the data we hold very seriously. We have a framework of policies, procedures and training in place covering data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

When and how we share personal data and locations of processing

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards. Personal data held by us may be transferred to:

- **Third party organisations that provide applications/functionality, data processing or IT services to us**

We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud based software as a service providers, identity management, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them.

- **Third party organisations that otherwise assist us in providing goods, services or information**
- **Auditors and other professional advisers**
- **Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation**

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

Changes to this privacy statement

We recognise that transparency is an ongoing responsibility so we will keep this privacy statement under regular review.

This privacy statement was last updated on 14 February 2018.

Data controller and contact information

The data controller is Circa Accountants Ltd (the limited company registered in England under registration no. 04506788 and with its registration address at 11 Clapham Park Road, Clapham London SW4 7EE) and such other Circa member firm that is a contracting party for the purposes of providing or receiving services.

If you have any questions about this privacy statement or how and why we process personal data, please contact us at:

Data Protection Officer

11 Clapham Park Road

London

SW4 7EE

Email: info@circaaccountants.co.uk

Phone: 020 7720 7300

Individuals' rights and how to exercise them

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights. Where we decide how and why personal data is processed, we are a data controller and include further information about the rights that individuals have and how to exercise them below.

Access to personal data

You have a right of access to personal data held by us as a data controller. This right may be exercised by emailing us at info@circaaccountants.co.uk. We may charge for a request for access in accordance with applicable law. We will aim to respond to any requests for information promptly, and in any event within the legally required time limits (currently 40 days).

Amendment of personal data

To update personal data submitted to us, you may email us at info@circaaccountants.co.uk or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which you registered. When practically possible, once we are informed that any personal data processed by us is no longer accurate, we will make corrections (where appropriate) based on your updated information.

Withdrawal of consent

Where we process personal data based on consent, individuals have a right to withdraw consent at any time. We do not generally process personal data based on consent (as we can usually rely on another legal basis). To withdraw consent to our processing of your personal data please email us at info@circaaccountants.co.uk or, to stop receiving an email from a Circa marketing list, please click on the unsubscribe link in the relevant email received from us.

Other data subject rights

This privacy statement is intended to provide information about what personal data we collect about you and how it is used. As well as rights of access and amendment referred to above, individuals may have other rights in relation to the personal data we hold, such as a right to erasure/deletion, to restrict or object to our processing of personal data and the right to data portability. Some of these rights will only be available from 25 May 2018.

If you wish to exercise any of these rights, please send an email to info@circaaccountants.co.uk.

Complaints

We hope that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to info@circaaccountants.co.uk. We will look into and respond to any complaints we receive.

You also have the right to lodge a complaint with the Information Commissioner's Office ("ICO") (the UK data protection regulator). For further information on your rights and how to complain to the ICO, please refer to the [ICO website](#).