



PRIVACY NOTICE

Mandrake (UK) Limited takes the protection of your privacy very seriously. We will only use your personal information to deliver the services you have requested from us, and to meet our legal responsibilities.

How do we collect information from you?

We obtain information about you when:

- you engage us for professional services,
- when you enquire about a potential engagement with us,
- when we are engaged to act as a data processor on behalf of a data controller (for example, when we carry out our payroll services on behalf of an employer),
- when you provide us with your personal details upon applying for a role within the firm, when you contact us via our website, sign up to receive our mailings or to attend one of our events.

The information collected will generally be obtained directly from you or from a third party which you have provided authority to as your agent. If we are acting as a data processor, the information may be passed to us via the data controller.

What type of information do we collect from you?

For our professional services, the information collected may relate to your personal and financial circumstances, for us to provide the service that we have been engaged to undertake. For example, we may record your name, address, telephone number, email address, date of birth, unique tax reference, national insurance number, bank account details, data in relation to your personal taxation circumstances, data regarding your business activities, your IP address, which pages you may have visited on our website and when you accessed them.

This could be a service for which either you or a third party have engaged us. For example, we may need to obtain personal data when we are acting as a data processor on behalf of a data controller (such as when we have been engaged to undertake payroll services for an employer or bookkeeping services for a client).

For job applications, this information may include your personal contact details, date of birth, education and skills, previous employment details, interests, ethnic origin, medical conditions, marital status, and CV.



How is your information used?

In general terms, and depending on which services you engage us to deliver, as part of providing our agreed services we may use your information to:

- Contact you by post, email or telephone
- Verify your identity where this is required
- Understand your needs and how they may be met
- Maintain our records in accordance with applicable legal and regulatory obligations
- Process financial transactions
- Prevent and detect crime, fraud and corruption

We are required by legislation, other regulatory requirements and our insurers to retain your data where we have ceased to act for you. The period of retention required varies with the applicable legislation but is typically five or six years. To ensure compliance with all such requirements it is the policy of the firm to retain data for a period of seven years from the end of the period concerned.

Why do we need to collect and use your personal data?

Our primary lawful basis for processing personal data is for the performance of our contracts with our clients and staff. This includes the processing of personal data when we are engaged by a data controller to provide our services as a data processor.

The information that we collect is essential for us to be able to carry out the agreed contract effectively. Without collecting personal data, we would be unable to fulfil our legal and regulatory obligations.

We will also use this data to notify clients of any news that we feel is relevant to our duty of care (for example, updates relating to changes in tax legislation or industry specific information). Where possible, we will communicate these updates electronically.

How will we use the information about you?

In general terms, and depending on which services we are engaged to deliver, as part of providing our agreed services we may use your information to:

For our business services (including those that we provide as a data processor):

- contact you by post, email or telephone
- verify your identity where this is required
- understand your needs and how they may be met
- maintain our records in accordance with applicable legal, regulatory and corporate governance obligations and good practice, ensuring our business policies are adhered to
- process financial transactions (this may include credit scoring and checking)
- prevent and detect crime, fraud or corruption



- complete our agreed services (such as completion of your personal tax return or business accounts), along with assisting in the gathering of information as part of investigations by regulatory bodies or in connection with legal proceedings or requests
- for operational reasons, such as recording transactions, training and quality control, ensure the confidentiality of commercially sensitive information
- investigate complaints
- improve our services

For our applicants and staff:

- consider you for a position within the firm
- maintain our records in accordance with applicable legal, regulatory and corporate governance obligations and good practice, ensuring our business policies are adhered to
- report regulatory statistics such as diversity and gender pay gap information
- where necessary, security vetting (such as DBS / CRB checks)

Third Party Service Providers working on our behalf

We may pass on your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

Please be assured that we will not release your information to third parties unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention and detection of crime, fraud or corruption.

Where it is necessary for your personal data to be forwarded to a third party we will use appropriate security measures to protect your personal data in transit.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime we may send your details to third party agencies for identity verification purposes.

We will not share your information for marketing purposes.

Any staff with access to your information have a duty of confidentiality under the ethical standards that this firm is required to follow.

If you are a member of staff, if there is a need to complete security vetting checks (such as DBS / CRB checks) in relation to work, we may need to pass your information on to the relevant third party for review. This is the only occasion when a third party processor is used in relation to staff personal data.



How long do we keep hold of your information?

In principle, your personal data should not be held for longer than is required under the terms of our contract for services with you. However, we are subject to regulatory requirements to retain data for specified minimum periods. We also reserve the right to retain data for longer than this where we consider it is in your interest for us to do so.

With regards to client data (and data which we obtain whilst acting as a data processor on behalf of a data controller), we will retain your personal data for a minimum of 7 years.

For human resources purposes, where you have applied for a position within the firm, we will retain your application for a minimum of 6 months from the closure of the vacancy unless you were successful (in which case, this record will then move to your staff file). For staff, we will retain your personal data for a minimum of 6 years after your employment ceases.

How can you access and update your information?

Keeping your information up to date and accurate is important to us. We commit to regularly review and correct where necessary, the information that we hold about you. If any of your information changes, please email or write to us, or call us using the 'Contact Information' noted below.

You have the right to ask for a copy of the information Mandrake (UK) Ltd holds about you.

Security Precautions in place to protect the loss, misuse or alteration of your information

Whilst we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given, or where you have chosen, a password which enables you to access information, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Your data will usually be processed in our offices in the UK. However, to allow us to operate efficient digital processes, we sometimes need to store information in servers located outside the UK, but within the European Economic Area (EEA). We take the security of your data seriously and so all our systems have appropriate security in place that complies with all applicable legislative and regulatory requirements.

Your choices

We may occasionally contact you by post, email or telephone with details of any changes in legal and regulatory requirements or other developments that may be relevant to your affairs and, where applicable, how we may assist you further. If you do not wish to receive such information from us, please let us know by contacting us as indicated under 'Contact Information' below.

Your rights

Access to your information: You have the right to request a copy for the personal information about you that we hold.

Correcting your information: We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

Deletion of your information:

You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained
- You have validly objected to our use of your personal information – see ‘Objecting to how we may use your information’ below
- Our use of your personal information is contrary to law or our other legal obligations
- We are using your information with your consent and you have withdrawn your consent – see ‘withdrawing consent to use your information’ below

Restricting how we may use your information:

In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where there is no longer a basis for using your personal information, but you do not want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Objecting to how we may use your information:

Where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

Withdrawing consent to use your information:

Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

Please contact us in any of the ways set out in ‘Contact Information’ below if you wish to exercise any of these rights.



Changes to our privacy notice

We keep this privacy notice under regular review and will place any updates on www.mandrakeuk.com. Paper copies of the privacy notice may also be obtained from Mandrake (UK) Ltd, Signpost House, Ambassador Way, Greens Road, Dereham, Norfolk NR20 3TL

This privacy notice was last updated on 14/9/2018

Contact Information

Mandrake (UK) Ltd, Signpost House, Ambassador Way, Greens Road, Dereham, Norfolk NR20 3TL

Email: info@mandrakeuk.com

Telephone: 01362 696612

Complaints

We seek to resolve directly all complaints about how we handle your personal information, but you also have the right to lodge a complaint with the Information Commissioner's Office at

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/concerns>