



The Gallagher Partnership LLP Privacy Policy

1. Scope

All data subjects whose personal data is collected by Gallaghers, in line with the requirements of GDPR. This is not just for and by our website, but by any means you communicate with us, be that phone, email, by post, by text or by fax and for the purpose of providing a service to you be that chargeable or not.

2. Responsibilities

2.1 The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to Gallaghers collecting/processing their personal data.

2.2 All Employees of Gallaghers who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy Notice

3.1 Who are we?

Gallaghers, as Chartered Accountants, is the organisation who collects the personal data from www.gallaghers.co.uk web site and in turn makes it a data controller, Gallaghers will use your data to help find the relevant service for yourself which in turn makes us also a data processor.

Regards to why we may collect the data and what we may do with it, we will use your data to find out your requirements and if you are interested in the services we offer on the website we will find your requirements and provide you with an introduction to the most suited service or 3rd party where we may receive a commission for the introduction.

If you are interested in our services we will use the details so we can process and service your requests in house.

3.2 Our Data Protection Officer can be contacted directly here:

- Name: *Chris Evans*
- Title: *Partner*
- Email: *chris@gallaghers.co.uk*
- Phone: *020 7490 7774*
- Address:

*The Gallagher Partnership LLP
2nd Floor, Titchfield House,*

69-85, Tabernacle Street,
London
EC2A 4RR

- Web: www.gallaghers.co.uk

3.3 The personal data we would like to collect / process is:

- **Personal data type:**
 - The source of the data we gather is an email generated from our web site www.gallaghers.co.uk which is directed to the email address partners@gallaghers.co.uk
 - The data we gather is as follows:

Contact name	We will use this to service your enquiry and to ensure we are speaking to the correct person when we make contact.
Contact number	We will use this to service your enquiry, we may call you so we can discuss your enquiry in more detail.
Contact Email	We will use this to service your enquiry, we will email details of the service(s) you have enquired about.
Service interested in	We will use this to service your enquiry, we will use this so the relevant person can deal with your enquiry ensuring you receive the best level of service from us.
Timestamp & date stamp of enquiry	We will use this to service your enquiry and for compliance to ensure we can provide proof of enquiry made. We will also use this date stamp so that we can remove your details in line with our data retention policies
IP address enquiry made on	We will use this for compliance to ensure we can provide proof of enquiry made, where this is used and when we capture it.
If you want to be Contacted In the future And how	We will use the information to contact you in the future and only contact you by the methods you choose.

3.4 The personal data we collect will be used for the following purposes:

- 3.4.1 We will use your data to help us service your enquiry.
- 3.4.2 We will use your data to help us manage any service you take out with us.

3.5 Our legal basis for processing for the personal data:

If you decide to enter into a business agreement with Gallaghers under the contract we will need to process your details to service that agreement.

3.6 The special categories of personal data concerned are:

We do not process any special categories in our standard services. We have included a list of what these categories are for your records under GDPR.

- Racial
- Ethnic origin
- Political opinions
- Religious beliefs
- Philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Health data
- Data concerning a natural person's sex life
- Sexual orientation

Should the need arise to process this information, we will contact you in advance with a clear description of the purpose of processing, the timescale of the processing and how we will dispose of the data at the end of that timescale.

3.7 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Gallaghers to process both standard and special categories of personal data as classified in the GDPR terms, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used. You may withdraw consent at any time by contacting us at the office via phone, post or email and we will action your request accordingly.

By sending your enquiry to us via our web site you confirm that you have read and accepted this privacy notice.

3.8 Disclosure

Gallaghers will not pass on your personal data to third parties without first getting your explicit consent.

3.9 Retention period

Gallaghers will process personal data for the length of any agreement we have in place to manage a service we provide, if we can't or you choose not to take out a service we provide you with, we will destroy your details unless you have opted in for further contact in regard to new services or news from Gallaghers we will always provide you with the opportunity to opt out on all future correspondence such as email opt in/out or via contacting our offices.

We have come to a decision on this time period as we believe this is how long we need the data to service the client's needs.

Our systems may be hosted by 3rd parties and where this is the case, we retain ownership of all data in the service for the duration of any agreements in place.

3.10 Your rights as a data subject

At any point while we are in possession of or processing your personal data you, the data subject, have the following rights

Right of access	You have the right to request a copy of the information that we hold about you.
Right of rectification	You have a right to correct data that we hold about you that is inaccurate or incomplete.
Right to be forgotten	In certain circumstances you can ask for the data we hold about you to be erased from our records.
Right to restriction of processing	Where certain conditions apply to have a right to restrict the processing.
Right of portability	You have the right to have the data we hold about you transferred to another organisation.
Right to object	You have the right to object to certain types of processing such as direct marketing.
Right to object to automated processing, including profiling	You also have the right to be subject to the legal effects of automated processing or profiling if used for a service we provide.
Right to judicial review	in the event that Gallaghers refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.9 above) in the processing of your personal data.

3.11 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Gallaghers (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the Information Commissioners Office as the UK supervisory authority and Gallaghers data protection representative as GDPR 'owner' within Gallaghers.

The details for each of these contacts are:

GDPR Owner / Data Protection Officer

- Name: *Chris Evans*
- Title: *Partner*
- Email: *chris@gallaghers.co.uk*
- Phone: *020 7490 7774*
- Address:
*The Gallagher Partnership LLP
2nd Floor, Titchfield House,
69-85, Tabernacle Street,
London
EC2A 4RR*
- Web: *www.gallaghers.co.uk*

Information Commission officer (ICO)

- Wycliffe House, Water Ln, Wilmslow, SK9 5AF
- <https://ico.org.uk>
- casework@ico.org.uk
- [0303 123 1113](tel:03031231113)

3.12 Privacy statement

Read more about how and why we use your data here

4. Online Privacy Statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

Gallaghers - How we use your information

This privacy notice tells you how we, Gallaghers, will collect and use your personal data as follows

• Visitors to our website(s)

When visitors arrive on www.gallaghers.co.uk we may use a third party service, such as Google Analytics, to collect from you some basic internet log information and information on your behaviour patterns while you're on the site. This information lets us know how many visitors come to the site and what pages they are looking at and the amount of time they spend on certain pages. The information collected cannot identify anyone and we ensure ourselves and google do not use this information to identify an individual or someone who has or is visiting our site. If we do want to collect personally identifiable information through our website, we will be up front about this.

We will make it clear when we collect personal information and will explain what we intend to do with it.

• **How www.gallaghers.co.uk (Gallaghers) use Cookies**

You can learn more about our cookie policy, which is available on our website.

• **E-Newsletter**

At times, we may send out a newsletter or information sheet on specific subjects to people who have explicitly expressed they want to be contacted with a newsletter or update and selected email as their preference for receiving this by selecting the relevant box on our enquiry form.

• **Security and performance**

We use a third-party programme to protect our website from malicious malware and attacks which means it will check your IP address on arrival.

• **People who contact us via social media**

We will contact you back on the platform you contacted us and we would always request explicit consent if you wanted us to send an email or contact you via phone.

• **Inbound Calls to Our Office Number**

We will collect your calling line identification (CLI) along with the staff member you speak to who may create a file on our client system where we will collect personal information. You will be made fully aware by the staff member of this happening and only with your consent will this be captured, this will only be collected to help with your enquiry.

• **USES MADE OF THE INFORMATION**

We use the information held about you in the following ways:

- Information you give to us.
 - o We will use this information to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services you request from us, to notify you about changes to or to make suggestions and recommendations that may interest you about our range of services, or to ensure that content from our site is presented in the most effective manner for you and for your computer.

Information we collect about you. We will use this information:

- to administer our site and for internal operations including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our services, when you choose to do so;
 - o as part of our efforts to keep our site safe and secure;
 - o to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
 - o to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Why does Gallaghers need to collect and store personal data?

In order for us to provide you with a service, the services we provide are as follows.

- Outsourced and Management Accounting Services
- Personal & Corporate Tax Services
- Audit & Compliance
- Insolvency & Business Recovery

We need to collect personal data for correspondence purposes and servicing the client's enquiry and to ensure we can provide any services that the client requested. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes Gallagher's would contact you for additional consent.

Will Gallagher's share my personal data with anyone else?

We will only pass your personal data on to a third-party service if you provide us with explicit consent. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide to you or us, as a sub-processor to us as the data processor.

When they no longer need your data to fulfil this service, they will dispose of the details in line with Gallagher's approved data disposal procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will Gallagher's use the personal data it collects about me?

Gallagher's will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Gallagher's is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Gallagher's contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

Gallagher's at your request, can confirm what information we hold about you and how it is processed. If Gallagher's does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the GDPR owner/data protection officer at Gallagher's, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Gallagher's or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely will be made available. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.

- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing where relevant.

What forms of ID will I need to provide in order to access this?

Once you have agreed to accept any of our services we will request information from you to prove who you are. This information will be kept on file and part of our compliance in law to carry out the services you have agreed to and will be retained for up to seven years beyond the length of any length of service(s) you agree to.

Gallaghers accepts the following forms of ID when information on your personal data is requested:

- 1. Passport or photo driving licence**
- 2. a proof of address (utility bill – from last 3 months)**

(If you can't provide a passport or driving licence we will accept a birth certificate with some form of photo ID & proof of address in the last 3 months)

Contact details of the Data Protection Officer / GDPR Owner:

GDPR Owner / Data Protection Officer

- Name: *Chris Evans*
- Title: *Partner*
- Email: *chris@gallaghers.co.uk*
- Phone: *020 7490 7774*
- Address:
 - The Gallagher Partnership LLP*
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