

## **DATA PROTECTION POLICY**

The Business will ensure the protection of personal data in accordance with this Policy by all Personnel and Suppliers.

### **THE DATA PROTECTION PRINCIPLES**

TAXNET FINANCIAL SERVICES (COMPANY) may process and store the following data:

- Personal and contact information
- Tax details such as income, payroll information etc
- HMRC information, tax returns, online services credentials

The company process the above data only for the scope of services that has been asked to provide to the client. Only employees, contractors or directors of the Company will process the above data.

The person of whom the data are processed has the right to request from the Company access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability. Also has the right to withdraw consent at any time, by sending us an email to info at taxnet dot co dot uk (info@taxnet.co.uk).

Where a client provides personal data of third party to the Company must ensure that such notice is provided to those third party data subjects on behalf of the Company.

In the context of the Company, personal data are typically processed on the basis of:

- processing is necessary for the performance of a contract to which the data subject (e.g. the client) is a party or in order to take steps at the request of the data subject prior to entering into a contract;
- processing necessary for the legitimate interests pursued by a client or the Company, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject. This ground may apply to the processing of the personal data of any third party data subjects whose personal data are provided by the client;
- a legal obligation to which the Company is subject and where compliance with such obligation necessitates the processing of personal data by the Company;
- data subject's consent, where such consent is procured from the client; and
- other legal grounds.

#### **1. Purpose Limitation**

The Company will typically process:

- the personal data of its clients as required for the purposes of providing its professional services and the administration of its client relationships;
- the personal data of its Personnel as required for the administration of Personnel, if applicable;
- the personal data of its Suppliers as required for the administration of its Supplier relationships, if applicable; and
- the personal data of its Clients, Personnel and Suppliers as is necessary in order to comply with its legal obligations.

#### **2. Data Minimisation**

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The Company should place a contractual obligation on each client to ensure that only the minimum necessary personal data is provided in connection with the professional services sought.

Where a client provides personal data that appears excessive in connection with the professional services sought, the Company will return such personal data to the client and request that an adequate record of personal data is provided.

### 3. Data Accuracy

The Company should place a contractual obligation on each client to ensure that any personal data provided in connection with the professional services sought is accurate, complete and up to date.

The Company will endeavour to keep an accurate record of personal data in relation to its clients and Personnel.

### 4. Individual Rights

The Company will ensure that all Individual Rights Requests are correctly identified and appropriately responded to, subject to any applicable exemptions.

### 5. Storage Limitation

The Company will keep all records as long as required as may be necessary having regard to custom, practice or the nature of the documents concerned.

Save for personal data included in records which must be kept for a prescribed period or preserved permanently in compliance with any legal obligations to which the Company is subject, such as the obligation explained above, personal data shall be kept for no longer than necessary for the relevant purpose.

### 6. Data Security

The Company will adopt the following security measures:

#### *Physical security measures*

- ensure physical security of premises, e.g. locked office;
- keep documents in locked cabinets;
- reduce access privileges to only those needed;
- grant access to only such Personnel who need to have access in connection with their duties;
- dispose of documents using a confidential bin or through a cross cut shredder; and
- other appropriate physical security measures.

#### *Organisational security measures*

- vet Personnel and Suppliers on a continuing basis;
- implement non-disclosure agreements prior to entering into formalised agreements;
- provide training to Personnel where appropriate;
- implement a strict ban on the use of personal email for work purposes; and
- other appropriate organisational security measures.

#### *Technical security measures*

- firewalls which are properly configured and using the latest software;
- regular patch management and OS updates;
- real-time protection anti-virus, anti-malware and anti-spyware software;
- user access control management, adopting principle of least privileges;

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- unique passwords of sufficient complexity and regular (but not too frequent) expiry;
- encryption of all portable devices ensuring appropriate protection of the key;
- data backup; and
- other appropriate technical security measures.

### 7. Accountability.

The Company will implement appropriate governance processes as set out in this Policy.

#### GOVERNANCE PROCESSES

In order to ensure that the Data Protection Principles are implemented the Company shall adopt the following governance processes.

##### A. Documented Policies

In order to ensure compliance with Data Protection Principle 9 (Accountability), the Company shall comply with this Policy and implement such other data protection policies and establish internal governance processes from time to time as may be required in order to operate the Company in compliance with data protection laws.

##### B. Assurance

The Business will ensure, by way of training or otherwise, that Personnel carry out their tasks in a way that will ensure compliance with data protection laws. Each member of Personnel and each Supplier shall have access to this Policy and it shall have an obligation to comply with it.

Each Supplier will have to comply with data protection obligations in accordance with its service agreement including, where appropriate, a data processing agreement.

The Company shall periodically review this Policy and other policies to ensure that they continue to comply with the relevant legal requirements.

##### C. Advice

Where necessary the Company shall seek advice in order to ensure that its processes comply with data protection laws.

##### D. Complaint handling

The Company shall implement a process to receive and handle enquiries and complaints from individuals and the supervisory authorities concerning the processing of personal data.

The Business shall ensure that all enquiries and complaints are dealt with in a timely manner, in compliance with any applicable statutory deadlines.

APPENDIX: GLOSSARY

<b>anonymous data</b>	Data which does not relate to an identified or identifiable individual, or personal data which has been rendered <u>permanently</u> anonymous in such a way that the individual is no longer identifiable (even if the data was combined with other data held by the Business Company).
<b>Automated Decision</b>	A decision which produces legal effects, or similarly significantly affects an individual, and which is based solely on the automated processing (including profiling) of their personal data.
<b>Company</b>	The business of providing services.
<b>data</b>	Any information which is recorded electronically or, where recorded in a manual format (e.g. on paper), is organised by reference to an individual.
<b>data subject</b>	The individual to whom the personal data relates.
<b>Individual Rights Request</b>	A request from a data subject in respect of their personal data, e.g. to access, erase, or rectify their personal data, or object to its processing.
<b>personal data</b>	Any data relating to an identified or identifiable natural person. This can include (but is not limited to) names, addresses, email addresses, positions held, photographs, job applications, personnel files, occupational health records, opinions, and correspondence to and from an individual.
<b>Personnel</b>	All employees of the Business at all levels, including, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors and external consultants.
<b>processing</b>	Any operation performed on personal data, such as collection, recording, storage, retrieval, use, combining it with other data, transmission, disclosure or deletion.
<b>Sensitive or special categories personal data</b>	Personal data revealing a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; biometric (e.g. fingerprints or facial recognition) or genetic information; or information about a person's health, sex life or sexual orientation, or relating to criminal convictions or offences (including allegations).
<b>Supplier</b>	Any external vendor, supplier, consultant or similar third party engaged to provide services to the Company.