

Lochlyn Torey Privacy Policy

Introduction

The privacy policy below identifies how your personal information is collected and treated at Lochlyn Torey Limited. Please read the following carefully to understand our views and practices as, by appointing our services, or working for our company, you confirm your agreement hereto.

This policy describes how, in the course of its business, we at Lochlyn Torey collect and use personal data and why. It applies to personal data provided directly to us, through consent by the individuals concerned, and also to personal data provided to us by other organisations.

Personal data is data relating to an identifiable living person (referred to as a “data subject” within data protection law).

We are committed to the protection of personal data and to fair and transparent processing. If you have any questions about this privacy policy, you can contact us at info@lochlyntorey.co.uk

Lochlyn Torey processes personal information to provide payroll related services, to maintain our own accounts and records and to support and manage our own employees.

We promote ‘good information handling’ and recognise both our responsibilities as Data Controller and the rights of data subjects. Because of this recognition, personal data collected by us will be:

- processed lawfully, fairly and in a transparent manner
- collected for specified, explicit and legitimate purposes
- adequate to their intended use and kept to a minimum
- accurate and up to date
- kept for no longer than is necessary
- processed in a manner that ensures security

Data controller

For the purposes of current UK personal data protection laws, the Data Controller is Lochlyn Torey Limited, whose registered office is Basepoint, Waterberry Drive, Waterlooville, Hampshire. P07 7TH, and who is registered with The Information Commissioner’s Office (ICO) under Registration Reference ZA199405.

Types of personal data we may collect and process

Information that clients, suppliers and service providers may provide us during the course of our business will include, but not be limited to:

- Name, home address, personal email address, phone number, date of birth, NI Number, date of birth, UTR number, marital status and nationality
- Information that you provide during interim instructions to our staff, both verbally and in written/emailed correspondence

- Information that you provide by filling in any contact form on our website
- Information that you provide when you contact us via telephone
- Information that you provide when you email us
- Information that you provide when you visit our offices
- Information you provide through interacting with our pages on social media platforms which shall include, but not be limited to, Twitter, LinkedIn, and Facebook
- Information that may unintentionally be included within book keeping and other business records provided to us
- Information contained in surveys that we may use for research purposes and which are entirely optional

Why we process personal data

Personal data is only collected to the extent necessary for us to provide services to our clients, employees and for other agreed purposes, e.g. the processing of payments.

Where personal data is required for us to perform services on behalf of our clients e.g. payroll, we request that our clients provide all necessary information for those relevant individuals regarding our using their personal data. Our clients should therefore signpost to this Privacy Policy for their assurance.

The personal data we process may include contact details, details of business activities, information relating to management and employees, payroll details, and financial information such as details of income, taxation, financial interests and investments.

In providing a range of services to clients we may process personal data that relates to third parties with a business connection to our clients, such as other advisers, suppliers, transaction counterparties etc.

We will only process sensitive personal data with the individual's consent or as otherwise required by law or regulation. Some services may require us to process special categories of personal data such as ethnic origin or race, physical and mental health, sexual preferences, trade union membership, criminal records, and political, religious and philosophical beliefs.

We generally collect personal data directly from our clients or from third parties acting on their instruction.

Such personal data may be used for the following purposes:

- Provision of professional services – including payroll and general business support services. We may have to process personal data in order to deliver such services and/or advise accordingly.
- Administering and developing our business – to manage our relationship with clients, maintain and develop our IT systems, maintain our website, host events, and to administer various systems and applications.
- Security and risk management – we use various measures to protect personal data and other client information, which include monitoring the services provided to clients to detect, investigate and resolve security threats. Such monitoring may involve processing personal data, for example the automatic scanning of email correspondence for threats. Our client engagement procedure involves processing personal data that may be obtained from publicly available sources (such as databases and general internet searches) to identify any risks relating to individuals and organisations that may prevent us from working for a particular client or on a particular matter.

- Notification of changes and the promotion of our services to our clients – unless the relevant individual has opted-out, we may use client business contact details to provide information about our services, activities and events that may be of interest.
- Regulatory obligations and compliance – we are subject to various regulatory and professional obligations that may require us to process and/or retain personal data held on our client files.
- To provide you with emailed newsletters and other information pertinent to our sector
- To alert you, by letter, telephone, email, text of missed payments, imminent deadlines, compliance changes,

Sharing personal data with third parties

We respect your personal data. We have never and will never sell it to third parties.

Where we are legally permitted to do so, we may share personal data with third parties. We do not provide information to third parties for their own marketing purposes and we do not undertake mailings for third parties.

We will always ensure appropriate contractual arrangements and seek to ensure that there are appropriate technical and organisational measures in place to protect personal data.

We may provide personal data to:

- Third parties as instructed by the Data Subject
- Other Lochlyn Torey firms – we may share personal data with other associated Lochlyn Torey companies where required for the provision of services to our clients and/or for administrative purposes.
- We may also share personal data to third party organisations who assist us or are involved in providing services
- Service providers for IT, data processing or functionality – like many professional service providers, we use third party providers to support our business with the provision of services to our clients, such as cloud-based software providers, web hosting/management providers, data analysis providers, and data back-up and security/storage providers. We may transfer personal data to such third parties.
- Independent Financial Advisers, Lenders, Auditors and other third-party advisers – we may transfer personal data upon your instruction to appointed third parties as required by law or as reasonably required in the management of our services
- Lawful disclosure – we may be requested or compelled to disclose personal data to third parties such as regulators and law enforcement agencies. We will only provide personal data to such parties where there is a legal requirement or permission to do so.

Your rights of access and consent

We will only collect and store information about you with your consent. You provide us with your consent by choosing to provide your personal details when you engage our services.

You can change your mind or remove or add your consent at any time. You have the right of access to your personal records or other information that Lochlyn Torey holds about you. There is no administration charge for this service.

If any data or information we hold about you is inaccurate or out of date then please let us know and this will be corrected immediately. You can be removed from our database upon request.

To exercise your rights, revise your consent, access, amend, object or request deletion of your records you should send your request to info@lochlyntorey.co.uk

We will endeavour to respond to any request promptly and within any time limit required under current UK data protection law.

You also have a right to update your personal data that we hold. To do so, please either update the personal data via the web page or applications open to you, or email info@lochlyntorey.co.uk

Keeping personal data accurate and up to date

We will make every effort to keep your personal information accurate and up to date at all times, however we expect to be informed immediately of any change in your circumstances and contact details.

If you are a Director or Personal of Significant Control for a limited company, please be aware that you will need to inform Companies House of any changes in your circumstances e.g. address change within 14 days.

Exemptions and partial exemptions to data protection

You should be aware that, although a complex subject, extenuating circumstances could necessitate your personal information being accessed without your consent e.g. involving: homeland defence, fraud, courts of law, tax investigations, medical intervention and crime prevention. Detailed information on these exemptions can be sourced at The Information Commissioner's Office (ICO). <https://ico.org.uk>

Security of personal data

We have data protection policies, procedures and training in place, and regularly review such measures to ensure their continuing effectiveness. This privacy notice was last updated on 26 April 2018.

Complaints

We will investigate all complaints received and will endeavour to respond to complaints promptly.

Should you wish to complain about our use of your personal data, please contact us by email at info@lochlyntorey.co.uk

For further information and guidance on your rights in the event of a suspected breach in our dealing with your personal data, please visit the Information Commissioner's Office website: <https://ico.org.uk>.

Data retention

We will retain records of services provided (which may include personal data) for as long as necessary, for the purposes for which it was originally collected, or as required by applicable law or regulation.

Website visitors

Lochlyn Torey is committed to safeguarding the privacy of website visitors and service users.

Please refer to the Lochlyn Torey Website Terms and Conditions and Cookie Policy.

Office visitors

Visitors to our offices are not required to sign in at the reception area and therefore we do not maintain a record of our visitors.

In order to maintain the security of our offices, CCTV is used at our premises. We may use images captured from CCTV to prevent and facilitate the investigation of crime. The information processed may include visual images, personal appearance and behaviours. This information may be about anyone who enters or is in the immediate vicinity of the area under surveillance. Where necessary or required (e.g. for the detection of crime or for the investigation of incidents) this information may be shared with the data subjects themselves, our employees and agents, police forces and security providers. CCTV recording may be carried out by the owners of the offices that we occupy or their agents as well as by us.