

Privacy Policy

This privacy policy is issued by Macey Owen Limited that operates in the UK.

Our approach to privacy

Macey Owen Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Purpose of this privacy notice

This privacy notice aims to give you information on how Macey Owen Limited collects and processes your personal data. Personal data is any information relating to an identified or identifiable living person. Macey Owen Limited 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.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Macey Owen Limited is the controller and responsible for your personal data (collectively referred to as Macey Owen, 'we', 'us', or 'our' in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) the UK supervisory authority for data protection issues (www.ico.org.uk). We would however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Macey Owen Limited is a registered Company (No 06777953) with registered office – 5 Willow Walk, Cowbridge, CF71 7EE, 01446 772804. The Data privacy manager is Charlotte Hulley.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 1st May 2018 and historic versions can be obtained by contacting us.

We recognise that transparency is an ongoing relationship so we will keep this privacy statement up to date. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). 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.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity data

Includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender

Contact Data

Includes individual addresses, email address and telephone numbers

Government data

Includes company or individual UTR and or national insurance number

Transaction data

Includes details about payments to and from you together with details of the services you use from us

Financial data

Includes information about your employment including salary, details of other sources of income ie pensions, shareholdings, bank details, endowments policies' saving and all other related income

Technical data

Includes internet protocol (IP address, your login data, browser type, version time zone setting and location, browser plug-in types and version, operating system and platforms and other technology) on the devices you use to access our website.

Profile data

Includes your username and password, preferences, feedback and survey responses

Usages Data

Includes information about how you use our website, products and services

Marketing and communications data

Includes your preferences in receiving marketing from us and our third parties and your communications preferences

We do not collect any special categories of personal data about you (this includes details about your race, ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade unions membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions

You may give us your identity/contact data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you apply for our services

Third parties or publicly available sources

We may have received personal data about you from various third parties including technical data from the following parties

Analytic providers

Advertising networks

Search information providers

Government public bodies

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances

Where we need to perform the contract we are about to enter into or have entered into with you

Where it is necessary for our legitimate interest (or those of a third party) and your interest and fundamental rights do not override those interests

Where we need to comply with a legal or regulatory obligation

Purposes for which we will use your personal data

We use personal data for the following purposes

Providing professional services

Some of our services require us to process personal data in order to provide advice

Administer, manage and delivery our business and services

We process personal data in order to run our business including

Managing our relationships with clients

Developing our business and services

Maintaining and using IT services

Security, quality and risk management activities

We collect and hold personal data as part of our client engagement and acceptance policies

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

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

Change of purpose

We will only use your personal data for the purposes for which we collect it, unless we reasonable consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to have an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us

Disclosure of your personal data

We may have to share your personal data with parties set out below for various purposes

Internal 3rd parties - (other companies in the Macey Owen Limited Group) acting as joint controllers or processors and who are based in the UK

External Third Parties – Services providers (acting as processors) based in the UK who provide IT and system administration services

Professional advisors (acting as processor or joint controllers) including lawyers, bankers, auditors, insurers based in the UK who provide consultancy , banking, legal and insurance and accounting services

HMRC, regulators and other authorities (acting as processers or joint controllers) based in the UK who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow third party services providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Personal information about others

We may collect information about other members of your household or family or employees. If you give us information about another person, it is your responsibly to ensure and confirm that you have told the individual who Macey Owen Limited is and how we use personal information

International transfers

We do not transfer your personal data outside the European Economic Area (EEA)

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instruction and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purpose we collected it for, including the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purpose for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for records and other document evidence created in the process will be 7 years, after which it will be destroyed.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to

Request access to your personal data (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it

Request correction of the personal data that we hold about you

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of new data you provide to us.

Request erasure of your personal data

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be communicated to you, if applicable, at the time of your request.

Object to processing of your personal data

Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restrictions of processing of your personal data

This enables you to ask us to suspend the processing of your personal data in the following scenarios:

If you want us to establish the data's accuracy

Where your use of the data is unlawful but you do not want us to erase it

Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims

You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it

Request the transfer of your personal data to you or to a third party

We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine- readable format. Note that this right only applies to automated information which you initially provided consent for us to use where we used the information to perform a contract with you

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.