

Dated

March 2018



PRIVACY & COOKIE POLICY

in respect of

Heelan Associates Limited

Privacy Policy

<http://www.heelanassociates.co.uk/> (**Website**) is brought to you by Heelan Associates Limited, a company incorporated and registered in England and Wales under company number 05705976 whose registered office address is at Unit 1 Byngs Business Park, Soake Road Denmead, Waterlooville, Hants, PO7 6QX.

We take the privacy of our Website visitors very seriously. We ask that you read this privacy policy (**Policy**) carefully as it contains important information about how we will use your personal data.

For the purposes of the General Data Protection Regulation and all other relevant legislation, Heelan Associates Limited (**'we' or 'us'**) is the 'data controller' (ie the company who is responsible for, and controls the processing of, your personal data).

Personal data we may collect about you

Information that you provide

Personal information about you (such as your name, email address, phone number) will be obtained, whenever you complete forms on the Website.

We will also obtain personal information you provide when you send us feedback, post material, contact us for any reason and by any medium, sign up to a service, share information via the website's social media functions, enter a competition, complete a survey or report a problem with the website.

We will collect the following personal data from you when you engage with us:

- names
- email addresses
- phone numbers
- addresses
- national insurance number
- unique taxpayer reference number
- driving licence details/other photo ID
- previous accountant details
- bank details
- occupation
- marital status/date of marriage
- town of birth
- mother's maiden name

We may ask you to provide sensitive personal data from time to time (for example eye colour) for the purposes of ID verification. If we request such data, we will give you additional information as to why we are requesting the sensitive personal data and how we will use it and ask for your consent to process that information.

We may retain a record of any contact you make with us.

Personal Information about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his/her data;
- receive on his/her behalf and data protection notices;
- give consent to any transfer of his/her data;

Information from third parties

Occasionally we may receive information about you from other sources (such as credit reference agencies), which we will add to the information we already hold about you in order to help us supply our services to you.

Information that we will collect automatically

Cookies: We may monitor your use of the Website through the use of cookies and similar tracking devices. For example, we may monitor how many times you use the Website, which pages you go to and traffic data. This information helps us to build a profile of our users. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually. For further information on our use of cookies, please see the sections on cookies below.

Device information: We may also collect information about your device each time you use the Website. For example, we may collect information on the type of mobile device that you are using and its unique device identifier (for example, the IMEI number, the device's mobile phone number, or the MAC address of the device's wireless network interface), the type of mobile browser that you are using, the mobile operating system that you are using, mobile network information and the time zone setting.

Information on your device: We may also collect information which is stored on your device each time you use the Website. For example, we may collect contact information, login information, friends lists, photos, videos and other digital content with your prior consent.

Location data: We may also collect information to determine your location using GPS technology or such other location tracking software we may use from time to time. Some of the features of the Website will require access to such location data to work. If you would like to use any such feature, you will be asked to consent to provide such location information. You can withdraw your consent to providing this information at any time by sending an email to info@heelanassociates.co.uk.

How we use your personal data

We use your personal data for the following purposes:

- to help us identify you and any accounts you hold with us;
- to provide our services to you;
- administration;
- research, statistical analysis and behavioural analysis;
- customer profiling and analysing your service preferences;
- marketing—see 'Marketing and opting out', below;
- fraud prevention and detection;
- billing;
- credit scoring and credit checking—see 'Credit checking', below;
- customising the Website and its content to your particular preferences;
- to notify you of any changes to the Website or to our services that may affect you;
- improving our services.

What is our lawful basis or ground for using your personal data?

Under laws that are designed to protect your personal data, we need to have what is called a lawful basis or ground each time we use, share or otherwise process your personal data.

Where possible we always endeavour to process data with fully informed consent. By reading and agreeing to this Privacy Policy, you are consenting to us processing your personal data as detailed within this Privacy Policy.

We may also need to process your personal data to comply with any legal obligations which may be applicable. Likewise, we may process your personal data where this is in the public interest or it is to protect your vital interests, but this will only be in rare circumstances.

In most cases, our processing of your personal data is necessary for the performance of our services to you.

Certain uses of your personal data, or other processing activities, may not be strictly necessary to perform our services to you, however, they may be necessary for the purposes of our legitimate interests or the legitimate interests of a third party. They may also be in your interests.

When we say "legitimate interests", we mean our (or a third party's) interests in enabling us to provide our services to you as efficiently and securely as possible. For example, we may choose to use a third party to store your personal data; we may do this in part because our use of that service means that your personal data is more secure.

Marketing and opting out

If you have provided your consent, we may share your personal data with organisations who are our business partners and we or they may contact you (unless you have asked us or them not to do so) by mail, telephone, sms, text/picture/video message, email, about products, services, promotions, special offers, charitable causes that may be of interest to you. If you prefer not to receive any further direct marketing communications from us or our business partners, you can opt out at any time. See further 'Your rights', below.

The Website may contain links to other websites or apps which we or our partners own, or websites or apps of our partners or third parties. Please note that if you follow any of these links, the websites, apps and services provided through them will have their own privacy policies/terms of use. We do not accept any responsibility or liability for their respective privacy policies/terms of use or the collection and use of any personal data collected through these websites, apps or services. Please ensure that you review the relevant privacy policies/terms of use prior to providing any personal data to, or using these websites, apps and services.

Disclosure of your personal data

We may disclose your personal data to:

- other companies within our group;
- a third party who acquires Heelan Associates Limited or acquires substantially all of its assets, in which case the personal data shall be one of the acquired assets;
- our agents and service providers;
- law enforcement and regulatory agencies in connection with any investigation to help prevent unlawful activity or as otherwise required by applicable law;
- our business partners in accordance with the 'Marketing and opting out' section above.

Keeping your data secure

We will use technical and organisational measures to safeguard your personal data, for example:

- we adopt stringent measures to verify your identity;
- we store your personal data on secure servers;
- we routinely vet our data processors and review our data protection procedures.

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet.

Transfers of data out of the EEA

We will make reasonable efforts to ensure that your data is not transferred outside the European Economic Area (**EEA**). Where we use data servers that may transfer data out of the EEA we will take steps to ensure adequate protections are in place to ensure the security of your information and give you remedies in the unlikely event of a security breach.

All information you provide to us is stored with secure data processors for the purposes of storing your data, accounting purposes and social media purposes for example. A copy of your information is also stored securely on our internal server and computers where access is restricted.

Please note that we review all processors we utilise and ensure that there are adequate safeguards in place to protect your personal data, such as adherence to binding corporate rules or compliance with the **EU-US Privacy Shield Framework**, which is a

mechanism that ensures compliance with EU data protection requirements when transferring personal data from the European Union to the United States. You can learn more about Privacy Shield here: <https://www.privacyshield.gov/welcome>

Monitoring

We may monitor and record communications with you (such as emails) for the purpose of quality assurance, training, fraud prevention and compliance.

Your Rights

We will collect and store information about you as detailed above. You will be provided with opportunities to consent to this Privacy Policy and marketing when you provide your personal details to us.

You can change your mind, remove or amend your consent at any time.

- You have the **right of access** to your personal records or other information that we hold about you. There is no administrative charge for this service.
- You have the **right to rectify any errors** in the data we hold about you. If any data or information we hold about you is inaccurate, or out of date, please contact us and we will correct this immediately.
- You have the **right to have the data we hold about you erased**.
- If you wish us to continue to store your information but **wish us to keep your data separate** and not process it in any way, please let us know.
- You have the right to **object to us processing your personal data**, for direct marketing purposes for example. You may also specify that you object to direct marketing by particular channels such as by email or telephone. If this is the case, please specify the channels you are objecting to in your communications with us.
- You have the **right to data portability**. If you wish to obtain your data for your own purposes across different services, we will provide this information to you in a CSV file. There is no administrative charge for this service.
- You have the **right to object to any direct marketing**.

To revise your consent, access, amend or remove your records or assert any of your rights set out above, you should send your request in writing to us at info@heelanassociates.co.uk.

These rights may not apply in all situations or in relation to all types of processing.

You will need to provide proof of identity and address (eg a copy of your driving licence or passport, and a recent utility or credit card bill); and specify the personal data you want access to, amended or removed.

How long we will store your data

We will store your data for as long as necessary for the purpose of processing. The data may be deleted in the following circumstances:

- You have withdrawn your consent to data processing
- The original purpose for processing the data is no longer relevant or cannot be performed any more.
- The data is no longer up to date or accurate.

Children

Heelan Associates Limited generally only offer services to individuals over the age of 16. In using our services, you confirm that you have read and consented to this Policy and verify that you are over the age of 16. If you are under the age of 16 you must make this fact known to Heelan Associates and warrant that you have the consent of a guardian to provide personal information to us.

Use of cookies

A cookie is a small text file which is placed onto your mobile (or other electronic device) when you access our Website. We use cookies and other online tracking devices on our Website to:

- keep track of the items stored in your shopping basket and take you through the checkout process;
- recognise you whenever you visit the Website (this speeds up your access to the Website as you do not have to log on each time);
- obtain information about your preferences, online movements and use of the internet;
- carry out research and statistical analysis to help improve our content, products and services and to help us better understand our visitor and customer requirements and interests;
- target our marketing and advertising campaigns and those of our partners more effectively by providing interest-based advertisements that are personalised to your interests; and

- make your online experience more efficient and enjoyable.

The information we obtain from our use of cookies will not usually contain your personal data. Although we may obtain information about your device such as your IP address, your browser and/or other internet log information, this will not usually identify you personally. In certain circumstances we may collect personal information about you—but only where you voluntarily provide it (eg by completing an online form) or where you purchase services from us.

In most cases we will need your consent in order to use cookies on this Website. The exception is where the cookie is essential in order for us to provide you with a service you have requested (eg to enable you to put items in your shopping basket and use our check-out process).

Consent (browser settings)

If you visit our Website when your browser is set to accept cookies, we will interpret this as an indication that you consent to our use of cookies and other similar technologies as described in this website cookie policy. If you change your mind in the future about letting us use cookies, you can modify the settings of your browser to reject cookies or disable cookies completely.

Consent (notification on home page)

There is a notice on our home page which describes how we use cookies and which also provides a link to our Website privacy policy. If you use this website after this notification has been displayed to you, we will assume that you consent to our use of cookies for the purposes described in this Website privacy policy.

Third party cookies

We work with third-party suppliers who may also set cookies on our Website, for example Google, Facebook, Twitter, YouTube and Adobe Flash Player which we use to display video content. These third-party suppliers are responsible for the cookies they set on our site. If you want further information please go to the website for the relevant third party. You will find additional information in the table below.

Description of cookies

The table below is designed to provide more information about the cookies we use and why:

Name of cookie	Owner	Purpose of the cookie
_ga	Google Inc.	This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites' analytics reports. Duration: 2 years
_gid	Google Inc.	This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the site's analytics reports. Duration: 24 hours

How to turn off cookies

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of the Website. For further information about cookies and how to disable them please go to: www.aboutcookies.org or www.allaboutcookies.org.

Our contact details

We welcome your feedback and questions. If you wish to contact us, please send us an email at info@heelanassociates.co.uk or you can write to us at Unit 1, Byngs Business Park, Soake Road, Denmead, Waterlooville. Hampshire, PO7 6QX.

Changes to this privacy policy

We may change this Policy from time to time. You should check this policy frequently to ensure you are aware of the most recent version that will apply each time you use the Website.

Data Protection Supervisory Authority

The Data Protection Supervisory Authority in the UK is the Information Commissioners Office. Should you have any complaints about the way we handle your data, you may direct them to the ICO. More information on the ICO can be found on their website here: <https://ico.org.uk>