

Hazlewoods & Data Protection

August 2018

ADHERENCE TO DATA PROTECTION PRINCIPLES

Hazlewoods - Hazlewoods LLP, Hazlewoods Financial Planning LLP and Hazlewoods Management Services Limited - will process personal data for you, your clients, employees or suppliers in accordance with the latest data protection principles summarised below:

- process personal data lawfully, fairly and in a transparent manner.
- collect personal data only for specified, explicit and legitimate purposes.
- process personal data only where it is adequate, relevant and limited to what is necessary for the purposes of processing.
- keep accurate personal data and take all reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay.
- keep personal data only for the period necessary for processing.
- adopt appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage.

DATA PROTECTION OFFICER

Hazlewoods does not have a Data Protection Officer as defined under legislation. Our Technical Partner, and our Finance and Administration Partner oversee data protection matters. Hazlewoods Financial Planning LLP has a Compliance Officer.

We operate a Risk Management Policy with a network of Risk Mentors in place to promote internal policies and good practice.

GEOGRAPHICAL LOCATION

Hazlewoods is located in the UK.

You can find details of our Cheltenham and Staverton head office locations on our website <http://www.hazlewoods.co.uk>

Hazlewoods LLP is a member of HLB International, a network of independent professional accounting firms and business advisers. However, other members of this network do not have access to personal data unless you have arranged this with them.

DATA CONTROLLER REGISTRATIONS

You can find the registrations for Hazlewoods LLP, Hazlewoods Financial Planning LLP and Hazlewoods Management Services Limited via the Data Protection Register on the Information Commissioner's Office website: <https://ico.org.uk/>

PRIVACY POLICY

You can view our privacy policy on our website: <http://www.hazlewoods.co.uk>

This policy is updated periodically. It was changed to reflect GDPR and include the required information.

SHARING DATA WITH THIRD PARTIES

We will list the third parties we share personal data with via our privacy notice. We may be required to share personal data to meet a legal obligation which we are subject to.

LEGAL BASIS FOR PROCESSING PERSONAL DATA

Our legal basis or bases for processing personal data as a data controller will vary depending upon the activity we undertake with you directly, or in respect of your business. It will also depend on how we interact with you.

In some instances, we may be a data controller for your personal data or in respect of your employees, clients and suppliers as part of the accounts, auditing or other work we contract with you to undertake.

In other instances, we are a data processor appointed by you. For example, to process an employee payroll or provide other outsourcing services. The legal basis for processing this personal data lies with you as the data controller.

We rely on 'legal obligation', for example, where we are obliged to carry out anti-money laundering checks.

PURPOSE FOR PROCESSING

Our letter of engagement or other client agreement outlines the purpose for which we are processing personal data.

Where we judge the purpose to have changed, we will issue a further engagement letter or other documentation to reflect this.

Direct marketing is a separate purpose.

We give you the right to object to the processing of personal data for this purpose.

SECURITY OF PERSONAL DATA

We operate a series of security measures concerning access to our offices and our systems. The level and extent of each individual measure may vary, but can include, for example:

Access controls to buildings, systems and where appropriate, individual IT applications.

Anti-virus and malware prevention

Breach logging

Clear desk policy

Encryption

Equipment/access logs

Horizon scanning

Arranging back-up copies of personal data

Penetration testing

System monitoring

System updates (e.g. patching)

BUSINESS CONTINUITY PLAN (BCP)

We have a BCP in place which is tested periodically. The BCP covers for example:

- Business Continuity and Disaster Recovery Management Strategy and Policy
- Key contacts and Crisis Management Team Members
- Triggers for Invoking and Revoking Plans
- Roles and Responsibilities
- Communication Plans— internal and external, including with service providers and IT suppliers
- Specific Threat Plans

DATA BACK-UPS

For applications running on our in-house systems, we operate a back-up facility as contingency. Our back-up data is held off-site within the UK.

INTERNATIONAL DATA TRANSFERS

We seek to ensure that any transfers of personal data outside the EU are only made where appropriate safeguards are in place. Currently the most common safeguards we rely on are

- Where the European Commission has decided that a third country, a territory or one or more specific sectors in the third country, or an international organisation ensures an adequate level of protection. This currently includes the US privacy shield.
- Where a legally binding agreement is in place, model contract clauses are used or binding corporate rules apply (agreements governing transfers made between organisations within in a corporate group).

DATA FORMATS

We have reduced our off-site document storage to the minimum. In-house we strive to hold copies of documents electronically wherever practically possible.

DATA MINIMISATION

We continue to look at ways to minimise the personal data we request or hold. This may mean that some data we receive but do not require is returned or deleted. In other instances we might be obliged to anonymise personal data we have received.

RETENTION PERIODS

The timescales for the retention of data for the different activities we undertake are subject to various legal, regulatory or contractual requirements. We otherwise maintain a general 'seven year rule' for the retention of files.

DATA DISPOSAL

We arrange for redundant paperwork with personal data to be shredded securely.

Hardware and equipment which has held personal data is disposed of according to BS EN15713:2009.

POLICIES, PROCEDURES AND COMPLIANCE MONITORING

We have reviewed our policies and procedures against data protection legislation.

Hazlewoods recognises the need for compliance monitoring against the policies and procedures we have implemented.

STAFF TRAINING

Staff are required to confirm annually that they are aware of the need to maintain the confidentiality of client data.

Confidentiality clauses are present within employment contracts.

Briefings on data protection and risk management matters are delivered to business teams on a periodic basis.

We have internal policies in our Employee Handbook geared to ensuring that personal data is treated in line with data protection legislation.

PERSONAL DATA BREACHES

In the event of a personal data breach, as part of our risk management policy, we have procedures in place to enable these to be acted upon in line with the ICO's expectations and timescales.

Where we are acting as data processor i.e. dealing with personal data on your behalf, we recognise the need to notify breaches to you, as the data controller, as soon as we become aware of them.

SUBJECT ACCESS REQUESTS

Staff are reminded periodically of the need to refer any requests for copies of personal data or other requests to their Risk Administration colleagues.

We operate a policy and procedures for dealing with Subject Access Requests which draws on the ICO's latest guidance.

Where we are acting as data processor i.e. dealing with personal data on your behalf, we recognise the need to refer such requests to you as the data controller as soon as we become aware of them.

CONTRACTS WITH PROCESSORS

When we engage other parties to process personal data on our behalf, we undertake a review of their ability to provide "sufficient guarantees to implement appropriate technical and organisational measures" around the security of that processing.

We seek to ensure a contractual arrangement is in place between us and the data processor or sub-processor which takes account of relevant legislation. We refer to the ICO's checklist for such data processing agreements.

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