# Our **client privacy notice**

PM+M

## 1. PURPOSE OF THIS NOTICE

This notice describes how we collect and use personal data about you, in accordance with the General Data Protection Regulation (GDPR) from 25 May 2018 onwards, the Data Protection Act 1998 (before 25 May 2018) and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK ('Data Protection Legislation').

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

## 2. ABOUT US

PM+M Solutions for Business LLP, PM+M Wealth Management Ltd and PM&M Corporate Finance Ltd. (''PM+M'', "we", "us", "our" and "ours") is an accountancy, wealth management and business advisory firm providing a range of services across all areas of auditing, accounting, tax compliance and planning, corporate finance, payroll and financial planning.

- We are registered in England and Wales as follows:
- PM+M Solutions for Business LLP – as a limited liability partnership. Number OC311588.
- PM+M Wealth Management Ltd – company number 03626554
- PM&M Corporate Finance Ltd – company number 03661920

Our registered office is at New Century House, Greenbank Technology Park, Challenge Way, Blackburn, BB1 5QB.

PM+M also has an office based at:

- Waterfold House, Waterfold Business Park, Bury, BL9 7BR

For the purpose of the Data Protection Legislation and this notice, we are the 'data controller'. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

PM+M have designated Jane Parry as Head of Privacy for all PM+M entities. Sharon Trebilcock is designated as our Risk & Compliance Manager and is responsible for assisting with enquiries in relation to this privacy notice or our treatment of your personal data. Contact details are noted at Section 12 below.

## 3. HOW WE MAY COLLECT YOUR PERSONAL DATA

We obtain personal data about you, for example, when:

- you request a proposal from us in respect of the services we provide;
- you or your employer or our clients engage us to provide our services and also during the provision of those services;
- you contact us in person, by email, telephone, post, or social media (for example when you have a query about our services);
- from third parties (for example from your family, your legal representatives, your bank or your business associates, and information from our international alliance, Praxity); or
- from publicly available resources (for example, from your employer or from Companies House, the Electoral Register, Experian or Fame websites or your business website) We may obtain personal data that includes but is not limited to name, home address, email address, dates of birth, telephone numbers, and email addresses.

## 4. THE KIND OF INFORMATION WE HOLD ABOUT YOU

The information we hold about you may include the following:

- your personal details which may include but is not limited to; names, addresses, gender, date of birth, nationality, telephone and mobile numbers, email addresses, family, lifestyle and social circumstances, health and smoker status, passport, national insurance and tax codes and identification numbers, employment, income and financial details, bank account, investment, pension and insurance details, documentation of the above and notes of meetings;
- details of contact we have had with you in relation to the provision, or the proposed provision, of our services;
- details of any services you have received from us;
- our correspondence and communications with you;
- information about any complaints and enquiries you make to us;
- information from research, surveys, and marketing activities;
- Information we receive from other sources, such publicly available information, information provided by your employer, from our clients, from third parties who represent you, or information from our international alliance, Praxity.

## 5. HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU

We may process your personal data, and in some circumstances provide it to third parties for purposes necessary in complying with our legal obligations.

We may process your personal data for the purposes necessary for the performance of our contract with you, your employer or our clients. This may include processing your personal data where you are an employee, director, subcontractor, shareholder, partner, LLP member, supplier or customer of our client.

We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.

We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data, then you have the right to withdraw your consent to processing for such specific purposes.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

### Situations in which we will use your personal data

We may use your personal data in order to:

- carry out our obligations arising from any agreements entered into between you, your employer or your business/company and us (which will most usually be for the provision of our services);
- carry out our obligations arising from any agreements entered into between our clients and us (which will most usually be for the provision of our services) where you may be an employee, director, subcontractor, shareholder, partner, LLP member, supplier or customer of our client;
- comply with our legal obligations such as anti-money laundering regulations, and law enforcement
- provide you with information related to our services and our events and activities that you request from us or which we feel may be relevant to you based on the services we provide to you, or on the basis of our own legitimate interests provided they do not override any of your own interests, rights and freedoms which require the protection of personal data.
- in circumstances (e.g. an insurance application) where we may require special category data (race, ethnic origin, health etc) we will only use this personal data on the basis that you have consented for such purposes.
- seek your thoughts and opinions on the services we provide; and
- notify you about any changes to our services.

In some circumstances, we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

If you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered into with you. Alternatively, we may be unable to comply with our legal or regulatory obligations.

We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

### Data retention

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- the requirements of our business and the services provided;
- any statutory or legal obligations;
- the purposes for which we originally collected the personal data;
- the lawful grounds on which we base our processing;
- the types of personal data we have collected;
- the amount and categories of your personal data; and
- whether the purpose of the processing could reasonably be fulfilled by other means.

### Change of purpose

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose other than as set out in Section 5 above, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

## 6. DATA SHARING

### Why might you share my personal data with third parties?

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us, where we have your consent or where we have another legitimate interest in doing so.

### Which third-party service providers process my personal data?

"Third parties" includes third-party service providers and other members of our firm's international alliance, Praxity. The following activities are carried out by third-party service providers: IT and cloud services, Anti Money Laundering verification services, professional advisory services, administration services, payroll services, marketing services, customer relationship management (CRM) and portal services, financial services and banking services, training services, recruitment and psychometric analysis.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

### What about other third parties?

We may need to share your personal data with a regulator to comply with the law, or to otherwise comply with the purposes set out in Section 5 above. We may share your personal data with other third parties, for example in the unlikely event of the possible sale or restructuring of the business.

## 7. TRANSFERRING PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

If we are required to store or transfer personal information outside the EU in order to perform our contract with you, we will confirm the location in advance, and obtain confirmation as to whether the country/countries are deemed to provide an adequate level of protection for your personal information, as deemed by the European Commission, for the purpose of the Data Protection Legislation.

If there is not an adequacy decision by the European Commission, then we will put in place measures to ensure that your personal data is treated by those third parties in a way that is consistent with and which represents the Data Protection Legislation. This may include but is not limited to: model contract clauses, binding corporate rules, and pseudonymisation.

Should you require further information about this please contact us using the contact details outlined below. (Section 12)

## 8. DATA SECURITY

We have put in place commercially reasonable and 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 instructions, and they are subject to a duty of confidentiality.

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

## 9. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

### Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

### Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- 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 exercised your right to object to processing (see below).
- 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 basis. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the lawful basis for processing is consent or for the performance of a contract. This may be carried out by automated means if this is technically feasible.

If you want to exercise any of the above rights, please email our Risk & Compliance Manager sharon.trebilcock@pmm.co.uk

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## 10. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email our Compliance Officer: sharon.trebilcock@pmm.co.uk

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## 11. CHANGES TO THIS NOTICE

Any changes we may make to our privacy notice in the future will be available on our website at www.pmm.co.uk or you may request a copy by emailing sharon.trebilcock@pmm.co.uk

This privacy notice was last updated on 27 July 2020.

## 12. CONTACT US

If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please contact:

**Sharon Trebilcock - Risk & Compliance Manager**
PM+M Solutions for Business LLP
New Century House
Greenbank Technology Park
Challenge Way
Blackburn
BB1 5QB

Telephone: 01254 679131
Email: sharon.trebilcock@pmm.co.uk
Website: www.pmm.co.uk

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

**Information Commissioner's Office**
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113 (local rate) or 01625 545 745
Website: https://ico.org.uk/concerns