

## Data protection policy

This is a statement of the data protection policy adopted by PM+M Solutions for Business LLP, PM&M Corporate Finance Limited, PM&M Financial Planning Ltd, PMM (Holdings) Limited and PM+M Limited. ("PM+M", "we", "us", "our" and "ours")

We have reviewed and updated our privacy notices in line with the new General Data Protection Regulation (GDPR) requirements which were effective from 25 May 2018. You can access them here [Legal and privacy notices](#)

The management team are fully aware of the requirements of GDPR and have engaged in a full review of our systems and third-party providers to ensure that we comply with GDPR requirements.

We are registered with the Information Commissioner and our registration details can be found here: [ICO data protection public register](#)

In order to carry out our work, we need to collect and use certain types of personal information about the people we deal with, such as current, past and prospective employees, students, suppliers, clients, professional contacts and others with whom we communicate.

In addition, we may occasionally be required by law to collect and use certain types of personal information in order to comply with the requirements of government departments and agencies.

Under the Data Protection Legislation, all organisations which handle personal information must comply with a number of important principles regarding the privacy and disclosure of this information. We are committed to compliance with these principles.

We believe that the lawful and correct treatment of personal information is critical to our successful operation, and to maintaining the confidence of our stakeholders in us. We recognise that, to maintain our reputation and integrity as an open and professional organisation, we must be fully compliant with this legislation.

### *Data Protection Legislation*

In the United Kingdom and the European Economic Area (EEA), "Data Protection Legislation" means all applicable data protection and privacy legislation or regulations including The Privacy and Electronic Communications (EC Directive) Regulations 2003 (also known as PECR) and any guidance or codes of practice issued by the European Data Protection Board or the Information Commissioner, together with:

- prior to 25 May 2018, the UK Data Protection Act 1998; and
- from 25 May 2018 onwards Regulation (EU) 2016/679 (the "General Data Protection Regulation" or "GDPR"), as amended by the UK Data Protection Bill; and
- UK General Data Protection Regulation (UK GDPR) tailored by the Data Protection Act 2018, as amended or updated from time to time.

Outside of the EEA, "Data Protection Legislation" means local, territorial data protection and privacy legislation that governs the processing of Personal Data.

We fully endorse and adhere to the principles of data protection set out in the Data Protection Legislation and will:

- fully observe the conditions regarding the fair collection and use of personal information.
- meet our legal obligations to specify the purposes for which we use personal information.

- only collect and process the personal information needed to carry out our business or to comply with any legal requirements.
- ensure that the personal information we use is as accurate as possible.
- ensure that we don't hold personal information any longer than is necessary.
- ensure that people know about their rights to see the personal information we hold about them.
- take appropriate technical and organisational security measures to safeguard personal information and:
  - ensure that personal information is not transferred abroad without suitable safeguards.

As part of our GDPR review, we have reviewed our systems, data processes and procedures to identify how we manage personal data – how we got it, who can access it, where it is stored and how long it should be kept.

We have also addressed key areas including breach reporting, subject access and data retention so that you can ensure your data is safe with us.

With regards to individuals, we recognise the following rights under GDPR:

- the right to be informed.
- the right of access.
- the right to rectification.
- the right to erasure.
- the right to restrict processing.
- the right to data portability.
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

In addition, we will ensure that:

- there is someone with specific responsibility for data protection in the organisation. PM+M have designated Helen Clayton as Head of Privacy for all PM+M entities. Sharon Trebilcock is designated as our Risk and Compliance Director and is responsible for assisting with enquiries in relation to our data protection policy, and can be contacted at [sharon.trebilcock@pmm.co.uk](mailto:sharon.trebilcock@pmm.co.uk)
- we regularly review and audit how we handle personal information.
- the ways we handle personal information are clearly described.
- everyone handling personal information understands that they are responsible for following good practice.
- everyone handling personal information is appropriately trained and properly supervised.
- we regularly assess the performance of people who handle personal information.
- anybody wanting to make enquiries about handling personal information knows what to do; and
- queries about handling personal information are dealt with promptly and courteously.

If you want to exercise any of your rights, please contact Sharon Trebilcock PM+M Solutions for Business LLP, New Century House, Greenbank Technology Park, Challenge Way, Blackburn BB1 5QB.

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.