

# Ward Williams Creatives Limited Chartered Accountants

## Privacy Policy

### General Data Protection Regulation

May 2018

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#### Personal Data

In the EU's General Data Protection Regulation (GDPR), Personal Data is defined as "...any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an **identifier** such as a name, an identification number, **location data**, online identifier or to one or more factors specific to the physical, physiological, **genetic**, mental, economic, cultural or social identity of that person."

Ward Williams Creatives Ltd is part of the Ward Williams Group which includes Ward Williams Ltd, Ward Williams HR Ltd and Ward Williams Financial Services Ltd.

The following privacy policy will outline how Ward Williams Creatives Ltd will collect and use your personal data. The business of the firm is the provision of accountancy and taxation services to private individuals, businesses and companies.

#### How do we collect your information?

The most likely place that we will collect data from you is if you are a prospective client or a client. This will be by way of a combination of information gathered on a formal written Fact Find or provided in writing in a letter or email. Data may also be collected from you through discussions held in meetings or over the telephone. We always record in writing information collected verbally in order that a record can be kept of what we know. Sometimes, some data is provided about you via a third party (for example by an input you make with HMRC).

It is also possible that, if you have given us authority to contact another financial institution, that we obtain information from them on your affairs such as a life or pension policy. The data protection protocols of these providers will ensure that this information is only released to us on your instructions.

We also collect information when you voluntarily complete customer surveys and provide us with feedback.

#### How we use your information?

In the normal course of business and in order for us to provide suitable and compliant advice, it is necessary for us to collect personal data about the people we seek to advise.

Also, if you agree, we may wish to contact you about other products and services that we think may be of interest to you and, if you agree, we may pass on your personal information within our group of companies so that they may offer you their products and services.

We also use your personal information to provide details about you to third party product providers - for example loan or mortgage companies. The start of your relationship with them is usually by way of an application form onto which you would complete your personal data and sign. We usually process this form and other ancillary forms on your behalf.

We may use your information collected from our website to personalise repeat visits to our website.

Ward Williams Creatives Ltd will **NEVER** share your information for marketing purposes with companies outside the Ward Williams Group.

#### Why do we need to collect and store personal data?

In order for us to do any of the above, we must collect and store your data firstly for correspondence purposes. We will ensure that the information collected will only be used for its intended purpose and does not constitute an invasion of your privacy.

Our job is to make recommendations on all aspects of your accounting, taxation and financial planning needs which may include protection, retirement planning, investments, Wills & Lasting Powers of Attorney and Estate planning. In order for us to be able to make tailor-made recommendations it is vital that we understand the precise and comprehensive details of your circumstances.

This may involve details on all aspects from contact and identification details, health, employment, family details, full financial information and details of existing policies such as protection, pensions and investments. Without a full picture of you, it would be impossible for us to provide financial planning advice.

Ward Williams Creatives Ltd may wish to contact you for marketing purposes; however we would contact you for additional consent for that purpose if not already given.

#### Will we share your personal data with anyone else?

We may need to pass on your details to third parties who are either contracted to, or part of the Ward Williams group of companies. Any third parties onto which we pass your details are obliged to store your details securely and only process them if responding to an identified need or request.

For example, we may recommend to you that you establish a new pension policy with a pension company. In this instance, you would probably complete an application form which we would process on your behalf. We would be detailed as your financial adviser and would administrate the policy with the provider on your behalf. When the time comes that they no longer require your personal data, they will dispose of this accordingly and in line with their company policy. If we wish to pass your personal data to a third party, we will only do so with your explicit consent, unless we are legally obliged to do so.



### How will we use the personal data we collect about you?

Processing data constitutes as collecting, storing and using. We will process this data in accordance with the GDPR. We will do our utmost to keep your information accurate and up to date and not keep it longer than is necessary. Ward Williams Creatives Ltd may issue occasional reminders to you to keep your contact details up to date and will update them on our records accordingly.

Please be advised that there is information that we are required to keep in accordance with the law, such as information needed for tax and audit purposes. Personal data may be held for longer than these periods, however this will depend on the individual needs of the company.

### Under what circumstances will we contact you?

We will only ever contact you when necessary, or when you have requested that we do so. We do not mean at any point to be intrusive or ask for unnecessary information. We will do our best to ensure that the information we hold is as secure as possible to minimise the risk of unauthorised access or disclosure.

### Can you find out about the personal data that we hold about you?

If you want to see what personal data we hold on you and how it is processed, you may contact us to request this.

This is known as a Data Subject Access Request (DSAR) and you must request this in writing (either by post or email), providing the necessary identification before any information is released. If Ward Williams Creatives Ltd do store any of your personal data, you may request information on the following:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the GDPR owner, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Ward Williams Financial Services Ltd or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it was not collected directly from you.

- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

#### What forms of identification will you need to provide in order to access your personal data?

Ward Williams Creatives Ltd will accept the following forms of identification when information on your personal data is requested:

- A current Passport;
- A current Photo Driving Licence;
- A bank/credit card statement or utility bill showing your name and current address dated within the last three months.

#### Contact details of the GDPR Owner

If you wish to submit a Data Subject Access Request (DSAR,) or have any questions regarding this privacy statement, you must do so in writing using the following information.

**Address:**

Belgrave House  
39-43 Monument Hill  
Weybridge  
Surrey  
KT13 8RN

**Email:**

GDPR@wardwilliams.co.uk

**Telephone:**

01932 830664

#### Use of Cookies on our website

Our website address is [creative.wardwilliams.co.uk](http://creative.wardwilliams.co.uk)

To make our website simpler, small data files are placed on your computer. These are known as cookies. Most big websites do this too.

They improve things by:

- remembering settings, so you do not have to keep re-entering them whenever you visit a new page;
- remembering information you have given (e.g. your postcode) so you do not need to keep entering it;
- measuring how you use the website so we can make sure it meets your needs.

Our cookies are not used to identify you personally. They are just here to make the site work better for you. Indeed, you can manage and/or delete these small files as you wish.

You can opt out of [Google Analytics cookies for all sites](#).

To learn more about cookies and how to manage them, visit [AboutCookies.org](#).

### First Party Cookies

These are cookies that are set by our website directly.

We use Google Analytics to collect information about how people use this site. We do this to make sure it is meeting its users' needs and to understand how we could do it better.

Google Analytics stores information about what pages you visit, how long you are on the site, how you got here and what you click on. We do not use cookies to collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are.

There are also cookies that store basic data on your interactions with Umbraco, the CMS running this website.

### Third Party Cookies

These are cookies set on your machine by external websites whose services are used on our website. Cookies of this type are the sharing buttons across the site allow visitors to share content onto social networks. Cookies are currently set by Twitter, Facebook and Google+.

### Links to other websites

Our website contains links to our partners, as well as other external sites. You should note that, if you click through to any of these external sites, we do not have control over that site (unless it is a website which forms part of the Ward Williams Group of companies.) We cannot be responsible for the protection of any information that you provide to these other websites as they are not governed by this privacy statement. You should always exercise caution and look at the privacy statement of whichever website it is that you are visiting.

### Policy Changes

Ward Williams Creatives Ltd reserves the right to change this privacy policy and will post any revisions on our website. Your continued use of our website will be subject to the then-current privacy policy.