**FYLDE OFFICE SERVICE BUREAU LIMITED**

**GDPR COMPLIANCE**

**DATA PROTECTION POLICY**

**DATA PROTECTION STATEMENT**

**Introduction**

Your personal data is data which by itself or with other data available to us can be used to identify you. We are **Fylde Office Service Bureau Limited**,the data controllers. This data protection statement sets out how and why we will use your personal data. You can contact our Data Protection Lead, **David Parry**, at **dwp@fosb.com** if you have any questions.

Where there are two or more people named, this data protection statement applies to each person separately.

**The types of personal data we collect and use**

Whether or not you become a customer, we will use your personal data for the reasons set out below and if you become a customer we will use it in the course of our contractual business with you.We will collect this personal data directly from you or your employer, or from your previous accountant. The personal data we use may be about you as a personal or business customer and may include:

* Full name and personal details including:
  + Home address
  + Business address
  + Address history
  + Contact home, business and mobile telephone numbers
  + Email addresses
* Date of Birth and/or age
* National Insurance Number
* Unique Tax Reference Number
* Banking Information
* Employment Information
* Curriculum Vitae

**Providing your personal details**

We’ll tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases you must provide your personal data so we can honour our contract with you (unless you are an existing customer and we already hold those details).

**Using your personal data: the legal basis and purpose**

We’ll process your personal data:

1. As necessary **to perform our contract with you** for the relevant policy or service:
   1. To take steps at your request before entering into it;
   2. To decide whether to enter into it at our discretion;
   3. To manage and perform that contract;
   4. To update our records; and
   5. To trace your whereabouts to contact you about your account and recovering debt.
2. As necessary for our own **legitimate interests** or those of other persons and organisations, e.g. For good governance, accounting, and managing and auditing our business operations
3. As necessary **to comply with a legal obligation**, e.g.:
   1. When you exercise your rights under data protection laws and make requests;
   2. For compliance with legal and regulatory requirements and related disclosures.
4. Based on your **consent**, e.g.:
   1. When you request us to disclose your personal data to other people or organisations, or otherwise agree to disclosures;
   2. To send out marketing communications where we have asked for your consent to do so.

You’re free at any time to change your mind and withdraw your consent. This can be done by recorded delivery sent to our registered office which is currently **28 Orchard Road, Lytham St Annes, Lancashire, FY8 1PF**. The consequence of this might be that we can’t do certain things for you.

**Sharing of your personal data**

Subject to applicable data protection law, we may share your personal data with:

* Subcontractors and other persons who help us to provide our products and services;
* Companies and other persons providing services to us;
* Our accountants in the course of maintaining our financial records;
* Our legal and other professional advisors, including our auditors;
* Government bodies and agencies in the UK and overseas (e.g. HMRC, the Information Commissioner’s Office)
* Courts, to comply with legal requirements, and for the administration of justice;
* In an emergency or otherwise to protect your vital interests;
* To other parties linked to your account;
* To Employers as part of our service to distribute your Curriculum Vitae;
* To other parties who provide a service where you have indicated that you are looking for such service;
* Anyone else where we have your consent or where it is required by law.

**Your marketing preferences**

We may use your home address, phone numbers, email address and social media (e.g. Facebook, twitter, google) to contact you according to your preferences. You can change your preferences or unsubscribe at any time by contacting us. In the case of social media messages, you can manage your social media preferences via that social media platform.

**Your rights under applicable data protection law**

Your rights are as follows (noting that these rights don’t apply in all circumstances and that data portability is only relevant from May 2018):

* The right to be informed about our processing of your personal data;
* The right to have your personal data corrected if it’s inaccurate and to have incomplete personal data completed;
* The right to object to processing of your personal data (this right exists from the point of first communication);
* The right to restrict processing of your personal data;
* The right to have your personal data erased (the “right to be forgotten”);
* The right to request access to your personal data and information about how we process it;
* The right to move, copy or transfer your personal data (“data portability”); and
* Rights in relation to automated decision making including profiling.

**Requests made in relation to your data rights**

Any requests made to Fylde Office Service Bureau Limited in relation to any of the above rights should be directed to our Data Protection Lead Staff Member. If Fylde Office Service Bureau Limited is within its rights under the GDPR to refuse this request, you shall be informed of this decision as soon as possible.

Information given as a response to requests made under the above-named rights will ordinarily be provided free of charge to the requestee. However,Fylde Office Service Bureau Limited reserves the right tocharge a reasonable fee when a request is manifestly unfounded or excessive, or where we are asked to comply with requests for further copies of the same information.

The required information will be provided within one month of receipt of a valid request. Fylde Office Service Bureau Limited reserves the right to extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, you will be informed within one month of the receipt of the request and we will explain why the extension is necessary.

Any requests made verbally will be recorded under the terms set out by our data request recording policybelow.

**Data Protection Impact Assessment (DPIA)**

If and when Fylde Office Service Bureau Limited undertakes any new project where data processing is likely to result in a high risk to the rights and freedoms of natural persons, Fylde Office Service Bureau Limited will ensure that a Data Protection Impact Assessment is conducted to help identify, mitigate and minimise any privacy risks.

**You have the right to complain to the Information Commissioner’s Office. It has enforcement powers and can investigate compliance with data protection law: ico.org.uk.**

**For more details on all the above you can contact our Data Protection Lead staff member by phone or email at** [dwp@fosb.com](mailto:dwp@fosb.com) **or on 01253 727034**

***These policies will be reviewed every 12 months or more frequently as required to ensure that the Procedures remain compliant with the General Data Protection Regulation.***