Brexit Compliance Limited

Privacy Notice

*29 October 2019*

**Data protection privacy notice**

Brexit Compliance Limited (“**BC**”) is committed to protecting your personal information and to ensuring that your privacy is respected.  This Privacy Notice explains how any personal information that is collected about you is used.

**What is personal information?**

Personal information means any information about you from which you can be identified.  Examples of personal information include your name, home address, national insurance number, date of birth, telephone number and e-mail address but it also includes other pieces of information which can be used to identify you, either directly or indirectly, such as a cookie.

**About BC**

BC is a data controller. If you have any questions about this Privacy Notice or the information that is held about you please contact the Founder and Director of BC, James Read using the details set out below:

Title: Mr James Read

Email address:  exit@brexitcompliance.com

Postal address:  32 Cross Way, Harpenden, Hertfordshire, AL5 4QU, United Kingdom

Contact telephone number:  07968445506

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues. It would be appreciated if you could provide an opportunity for BC to deal with your concerns before you approach the ICO, so please contact us in the first instance.

**What types of information do we use?**

Information is collected about you in the course of providing you with regulatory advice and relevant information.  The information about you, which may be collected, used, and stored is:

* Payment details
* Contractual/contact information (i.e. our ‘history’ together – services provided or discussed); and,
* Instructions or requests.

**Consequences of not providing some types of information**

Where your personal information must be collected by BC to satisfy legal requirements, or under the terms of a contract, and you fail to provide that information when requested, it may not be possible to provide the products and services you asked for.  In this case the product or services offered to you may be cancelled, but you will be told if this is the case.

**How does BC collect information about you?**

Typically information is collected from you when you contact BC directly or provide information to facilitate the provision of products and services.  Information is collected about you in the following ways:

Through **direct interactions** when you, or someone you that you have authorised to, give BC your personal information by filling in forms or during correspondence. This includes when you:

* Apply for BC’s products and services;
* Create an account;
* Complete questionnaires, for example to give feedback; and
* Speak to BC over the telephone.

Through using our website when we collect information using cookies or similar technologies which provide information about your equipment, browsing actions and patterns.

**How BC uses your personal information**

BC only obtains, uses and keeps personal information where it is needed for a specific purpose.  The table below explains the ways in which your personal information might be used.  BC is only able to use your personal information if there is a proper legal reason or basis for doing so.  This is called a legal basis and the regulations require that BC has a legal basis so that your privacy is protected.  Most commonly your information used in the following ways:

* BC has a contract with you. For example, to provide regulatory advice or services to you and BC has a contractual agreement to do this.
* Where there is a legal obligation. BC needs to use your personal information to comply with laws that assist in the prevention of financial crime and to comply with regulatory obligations.  For example this might include confirming your identity and source of wealth, as well as ensuring that BC provides you with necessary information so you understand the scope of services that BC can provide.
* BC has a legitimate interest in processing the information and your interests and fundamental right do not override those interests. For example, processing your information to provide regulatory advice services to you.

In the table below all the ways we plan to use your personal information and the legal bases that are relied on to do so.  There is also an explanation of what our legitimate interests are where appropriate:

|  |  |
| --- | --- |
| **Purpose** | **Lawful basis for processing including our legitimate interests** |
| 1. To on-board you as a new customer
 | 1. To fulfil our contract with you
 |
| 1. To manage your account
 | 1. To fulfil our contract with you
 |
| 1. To contact you about other products and services we think you may be interested in
 | 1. Necessary for our legitimate interests – to develop our products and services.
 |

We will only use your personal information for the reason for which we collected it.  We will only use it for another reason if we believe that new reason is compatible with the original purpose.  If we do need to use your personal information for a non-related purpose we will tell you about it and explain the legal basis which allows us to do so.

**Marketing**

BC can use your personal information to send you communications if there is believed to be a ‘legitimate interest’.  BC is required to make an assessment with regards of how appropriate it is to contact you in a given way and whether it would be unfair to you. BC will only contact you about its products and services if it is believed that it would be of interest or beneficial for you.

You are free to change your mind at any time by emailing exit@brexitcompliance.com and writing “Unsubscribe” in the email header.

**Who we share your information with**

BC may need to provide information to third parties for a variety of reasons, for example, it may be legally required for your information to be provided to assist in the detection or prevention of crime or for the purpose of safeguarding national security. The third parties that your information may be shared with include:

* law firms; and
* payment services providers.

**Sending your information outside of the EEA**

The regulations which have been put in place to protect your privacy apply throughout the EEA.  The EEA is the European Economic Area which includes all the countries in the European Union plus Iceland, Liechtenstein and Norway.  This means that any country within the EEA must meet the same privacy standards as the United Kingdom.  All the personal information that BC holds about you will be processed in the United Kingdom/EEA.

**Storing your information**

As a regulatory services provider BC will typically have a contract with you and will need to keep your personal information (updated to ensure accuracy) to fulfil our contract.  BC also need to comply with EU and UK law, which often requires a retention of certain records - which will include certain personal information – for several years longer.

BC will ensure all records are safely destroyed if they are no longer needed.  BC reviews its retention periods for personal information on a regular basis. You will be informed of any changes the retention period.

**Your rights**

You are provided with a number of different rights under the data protection laws in relation to your personal information. These allow you:

* To access your information;
* To request we correct your information;
* To request that we erase your information;
* To object to the processing of your information;
* To request a restriction in the processing of your information;
* To request a transfer of your information; and
* To withdraw your consent.

If you wish to exercise any of these rights please email: exit@brexitcompliance.com . Please note that you will not have to pay a fee to access your personal information or to exercise any of the other rights.  BC may, however, charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or BC may refuse to deal with your request.  BC may also need to seek further information from you to confirm your identity before any personal information is released to you.  This does not affect your right to make a complaint.

**Security**

BC has put in place appropriate security measures to protect your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.  BC will notify you, and other regulators, where we are legally required to do so.