

Redstone Privacy Policy

BACKGROUND:

This Notice sets out the obligations of Redstone Accountancy Services Ltd, a company registered in England under number 11147891, whose registered office is 28 Kansas Avenue, Salford, M50 2GL ("the Company") regarding data protection and the rights of our users ("data subjects") in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation ("GDPR").

Redstone Accountancy Services Ltd takes your privacy very seriously and knows that you care how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

We respect and value the privacy of everyone who visits this website, www.Redstoneas.com ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this Privacy Notice carefully and ensure that you understand it. Your acceptance of Our Privacy Notice is deemed to occur upon your first use of Our site and you will be required to read and accept this Privacy Notice when signing up to our mailing list/becoming a client. If you do not accept and agree to this Privacy Notice, you must stop using Our Site and immediately.

1. Definitions and Interpretation

In this Notice, the following terms shall have the following meanings:

"Cookie" – means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;

Cookie Law – means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

"data subjects" – means any and all people who we hold the personal data for. In these circumstances, we are the Data Controller.

"personal data" – means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR");

"Data Controller" – means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be processed;

"Data Processor" – in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller;

"We/Us/Our" – means Redstone Accountancy Services Ltd a limited company registered in England under number 11147891, whose registered office is 28 Kansas Avenue, Salford, M50 2GL ("the Company")

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2. Information About Us

This Notice sets out the obligations of Redstone Accountancy Services Ltd a limited company registered in England under number 11147891, whose registered office is 28 Kansas Avenue, Salford, M50 2GL ("the Company").

Data Protection Officer: Craig Watts
Email address: enquiries@redstoneas.com
Telephone number: 0161 667 4911
Postal Address: 28 Kansas Avenue, Salford, M50 2GL

3. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data and your client's personal data.

4. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified, in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you or your clients that enables you or them to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 6, below.

5. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 13.
- The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 13 to find out more.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 13 to find out more.
- The right to restrict (i.e. prevent) the processing of your personal data.
- The right to object to us using your personal data for a particular purpose or purposes.
- The right to data portability. This means that you can ask us for a copy of your personal data held by us to re-use with another service or business in many cases.
- Part 6 explains more about how we use your personal data, including automated decision-making and
- For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 13.

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- Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.
- If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

6. What Personal Data Do You Collect?

Your Personal Data

We may collect some or all of the following personal data (this may vary according to your relationship with us:

- Name;
- Address;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Profession;
- Information about your preferences and interests;
- Size of your business in terms of: No. of staff, annual revenue (as a banding) and No. of clients (as a banding.)
- Business goals and challenges

The acquisition of personal data in the course of Client Due Diligence (CDD) is restricted to that required for Anti-Money Laundering/Counter-Terrorist Financing (AML/CTF) purposes and for the execution of the client's business.

7. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email, text message and post that you have opted-in to (you may unsubscribe or opt-out at any time by choosing 'unsubscribe' in our correspondence or by contacting us.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message and/or post with information, news, and offers on our products/services, events, webinars, industry updates and general business & entrepreneurial advice. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

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We use the following automated systems for carrying out certain kinds of decision-making and profiling. If at any point you wish to query any action that we take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the GDPR gives you the right to do so. Please contact us to find out more using the details in Part 13.

- The following automated decision-making method(s) may be used:
 - Your engagement with our email content so that we can ensure we are sending you content related to the emails you engage with and with an appropriate level of frequency.
- The following automated profiling may take place:
 - Your location so that we can ensure the content we provide you with is most relevant.
 - The size of your business so that we can ensure the content we provide you with is most relevant.

8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary for light of the reason(s) for which it was first collected. Your personal data will, therefore, be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Personal data for marketing purposes prior to you signing up to become a client – this will be retained until you fail to engage with our content for a period of 6 months or until you opt-out of our communications.
- Personal data for marketing purposes whilst you're a client – this will be retained for the duration of you being a client so we can best support you and provide you with information about relevant products and services, events, webinars and industry-specific advice which we also provide and which we feel you will also benefit from.
- Personal data for marketing purposes after you were a client – this will be retained until you opt-out of our communications.

9. How and Where Do You Store or Transfer My Personal Data?

Your Personal Data

We store your personal data in the UK. This means that it will be fully protected under the GDPR.

We also may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR including:

- Ensuring that the companies we use to store your data are absolutely critical to the providing of our service. This includes but is not limited Xero.
- Ensuring that the method of passing data to them complies with the securest methods appropriate to the passing and nature of that data.

10. Do You Share My Personal Data?

We may share your information with:

- third parties used to facilitate payment transactions, for example, Go Cardless
- third parties where you have a relationship with that third party and you have consented to us sending information (for example social media sites or other third party application providers);

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- third parties for marketing purposes (e.g. our partners and other third parties with whom we work and whose products or services we think will interest you in the operation of your business activities.
- any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);
- any third party in order to meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;

11. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held).

This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 13.

There is not normally any charge for a subject access request.

We will respond to your subject access request within 30 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

12. How Can I Have My Data Erased?

If you wish for your personal data to be erased from our various systems, please contact us (See Part 13) and we will follow our strict procedures to ensure that all of your data has been removed from our systems.

13. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Craig Watts):

Email address: Enquiries@redstoneas.com
Telephone number: 0161 667 4911
Postal Address: 28 Kansas Avenue, Media City, Salford, M50 2GL

14. Our Use of Cookies

- Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products and We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
- By using Our Site, you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third Party Cookies are used on Our Site for advertising purposes such as Google Adwords and Facebook Ads. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.

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- All Cookies used by and on Our Site are used in accordance with current Cookie Law.
- Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
- Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 13.7, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- You can choose to delete Cookies on your computer or device at any time, however, you may lose any information that enables you to access Our Site more quickly.
- It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. What if There’s a Data Breach?

We work to the highest levels of security, however, in the unlikely event of a data breach, then:

- All personal data breaches must be reported immediately to the Company’s Data Protection Officer.
- If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Officer will ensure that the Information Commissioner’s Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.
- In the event that a personal data breach is likely to result in a high risk to the rights and freedoms of data subjects, the Data Protection Officer must ensure that all affected data subjects are informed of the breach directly and without undue delay.
- Data breach notifications shall include the following information:
 - The categories and approximate number of data subjects concerned;
 - The categories and approximate number of personal data records concerned;
 - The name and contact details of the Company’s data protection officer (or other contact point where more information can be obtained);
 - The likely consequences of the breach;
 - Details of the measures taken, or proposed to be taken, by the Company to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

16. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available here.

For more information on your rights as an individual under the new GDPR regulations, please visit

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights>