

## **GDPR PRIVACY POLICY STATEMENT**

### **A-NET PROFESSIONALS LIMITED**

#### **THE GENERAL DATA PROTECTION REGULATION (GDPR)**

The General Data Protection Regulation (GDPR) takes effect on 25th May 2018, and we have updated our Privacy Policy to reflect these changes. The GDPR represents a significant step forward in enhancing individuals' control over how their data is collected, stored, and used. It strengthens and modernizes existing data protection laws, which were originally drafted in a non-digital era.

At A-Net Professionals Limited, we have always prioritized the security and confidentiality of both business and personal data. Over the years, we have implemented robust processes and systems to ensure that we take all reasonable measures to safeguard information.

By reviewing our updated Privacy Policy below, you will gain insight into your rights under the GDPR and how we have incorporated its requirements to reinforce our commitment to data protection.

#### **PRIVACY POLICY**

##### **INTRODUCTION AND TERMS**

A-Net Professionals Limited is a registered Data Controller with the Information Commissioner's Office (ICO).

We may update this Privacy Notice from time to time. If any amendments are made, we will provide you with a copy and/or ensure it is readily accessible.

In cases where we act as a Data Processor on behalf of a Data Controller (e.g., for payroll services), we will issue a Letter of Engagement and operate in full compliance with the GDPR regulations, adhering strictly to the agreed terms.

##### **HOW THE LAW PROTECTS YOU**

We are committed to protecting and respecting your personal data and privacy. This Privacy and Cookie Policy outlines how we collect, use, and safeguard any personal data obtained through our services. Whenever you provide us with personal information, we are legally obligated to process it in accordance with all applicable data protection laws.

In addition to this Privacy Policy, your privacy is also protected by law. The General Data Protection Regulation (GDPR), which came into effect on 25th May 2018, ensures that we only use your personal information when we have a valid legal basis to do so. This includes circumstances where we may share your data outside the A-NET PROFESSIONALS LIMITED Group.

Under the law, we must have at least one of the following lawful bases for processing your personal data:

To fulfil a contract – when we need to provide our services to you.

Legal obligation – when we are required by law to process your data.

Legitimate interest – when we have a business or commercial reason to use your information, provided it does not override your rights and interests.

Consent – when you have given explicit permission for us to process your data.

If we rely on legitimate interest as the basis for processing your data, we will clearly communicate what that interest is and ensure that it does not unfairly impact your rights.

## **Your Rights**

Under the General Data Protection Regulation (GDPR), you have the following rights:

- Right to be informed – We are committed to transparency in how we process your data, as outlined in this Privacy Notice.
- Right of access – You have the right to request details of the personal data we hold about you and the reasons for processing it.
- Right to rectification – If any of your personal data is inaccurate or outdated, we are required to correct or update it.
- Right to restrict processing – You may request that we temporarily or permanently stop processing your personal data.
- Right to data portability – You have the right to obtain and reuse your personal data for your own purposes.
- Right to object – You can object to the processing of your data, particularly for direct marketing or profiling purposes.
- Rights related to automated decision-making and profiling – We do not use automated decision-making or profiling in our processing activities.

## **Data We Collect About You**

We process personal data, which may include:

- Your (or your employer's or our client's) name, address, date of birth, family relationships, and email address.
- Your IP address and cookies when using our website.
- Financial data, including tax information, bank account details, investments, payroll records, accounting records, and statutory returns.
- Identification documents such as driving licenses, passports, or birth certificates, to comply with legal requirements, including anti-money laundering and anti-terrorism legislation.

## **We collect personal data through:**

- Our website.
- Direct engagement (or potential engagement) of our services.
- Communications via email, telephone, post, or social media.
- Networking and third-party service providers.
- Publicly available resources (e.g., Companies House).
- Internet tracking software, such as Google Analytics, to understand how our digital services are used and improve the user experience.

## **How Your Data Will Be Used**

We use your data to:

- Provide services to you (or your employer or our client) under a contract, as outlined in our Letter of Engagement.
- Ensure our website and digital services function optimally.
- Offer you relevant products, services, or information, where you have consented or where there is a legitimate interest.
- Enable participation in interactive features of our services.
- Maintain and improve our IT infrastructure.
- Notify you of service updates.
- Fulfil our legal obligations, including compliance with money laundering, anti-terrorism financing, and the Criminal Finance Act.
- Investigate and defend potential complaints, disciplinary matters, and legal proceedings.
- Invoice you for our services and resolve any fee-related disputes.

If you do not provide certain requested information, we may be unable to fulfill our contract with you or meet legal obligations. In some cases, we may process your data without your consent, where legally required or permitted. We also utilize social media and may process public comments made by you.

## **Legitimate Interest & Marketing**

We may process your personal data for our legitimate business interests, provided they do not override your rights and freedoms. This may include:

- Marketing, business development, statistical, and management purposes.
- Sending information about relevant products, services, and events if you are an existing client or contact.

You have the right to opt out of marketing communications at any time. We will never sell your data to third parties for marketing purposes.

## **How We Share Your Data**

We may share your data:

- Within A-Net Professionals Limited – for administrative and business development purposes.
- With third-party service providers – including:
  - Cloud accounting and payroll providers (e.g., Xero).
  - Email and secure document exchange systems.
  - Telemarketing and research agencies.
  - Off-site storage and cleaning services.

All third-party providers are required to implement appropriate security measures to protect your personal data and may only process it according to our instructions.

If we transfer your data outside the European Economic Area (EEA), we will take reasonable steps to ensure it receives the same level of protection, such as ensuring third-party providers comply with the Privacy Shield Framework (for transfers to the U.S.).

### **Data Retention**

We will retain your personal data only for as long as necessary to fulfill its intended purpose, considering:

- Business and service requirements.
- Legal and regulatory obligations.
- Lawful grounds for processing.
- The nature and sensitivity of the data.

### **Data Deletion**

Under GDPR, you have the right to request the deletion of your personal data under specific circumstances. Requests must be submitted in writing to the Managing Partner and will be assessed on a case-by-case basis.

### **Data Correction**

You may request corrections or updates to your personal data by contacting our Chief Operating Officer in writing, clearly specifying the information that requires amendment.

### **Data Security**

We implement commercially reasonable and appropriate security measures to prevent:

- Accidental loss.
- Unauthorized access, use, alteration, or disclosure.

Access to personal data is restricted to employees, agents, and contractors with a business need. They are required to process data in line with our instructions and confidentiality obligations.

In the event of a suspected data breach, we will notify you and the relevant regulatory authorities as required by law.

### **Data Inspection (Subject Access Requests)**

Under GDPR, you have the right to request a copy of the personal data we hold about you. Such requests must be submitted in writing. We will respond within one calendar month, confirming:

- Whether your data is being processed.
- The purpose and lawful basis of processing.
- The categories of personal data held.
- The recipients of your data.
- A copy of the requested data in an accessible format.

You may need to provide identification to verify your identity before we process your request. If we do not hold any data on you, we will confirm this in writing.

### **Changes to This Privacy Notice**

We regularly review this Privacy Notice and recommend checking back periodically for updates. We may also display this notice to you from time to time to ensure you remain informed of its contents.

### **Withdrawal of Consent**

Where processing is based on your consent, you may withdraw it at any time. However:

- Withdrawal does not affect the lawfulness of prior processing.
- We may still be legally required to process certain data.
- Withdrawal may impact our ability to provide services to you.

### **Complaints**

If you have concerns about how your data is processed, please contact us using the details provided. If you remain unsatisfied, you have the right to file a complaint with the Information Commissioner's Office (ICO):

*<https://ico.org.uk/concerns>](<https://ico.org.uk/concerns>*