

## Privacy Notice

### Data Protection

Here at AS Advisors Limited we endeavour to keep your personal data secure and safe at all times.

We understand the need to keep your personal information on a need to know basis. Should we receive any additional data that we deem of no specific interest to our needs, we will securely remove this.

All personal data will only be able to be accessed by employees of AS Advisors Limited. At no time will your personal data be conveyed to a third party. Please note this excludes HMRC whom have requested such information. We will always gather your consent prior to corresponding with HMRC.

### Personal Data - Tax Investigation Services

It is imperative that we receive all specific documentation which may assist us in dealing with your enquiry. This includes but is not limited to:

Proof of ID and proof of address	for us to fulfil our 'KYC' (Know Your Customer) requirements
Contact details	including but not limited to address, phone number and email address to be able to keep in contact with you
Date of Birth	to determine whether you pay National Insurance or not
National Insurance number	to reference on any HMRC correspondence
HMRC correspondence	for us to deal with your enquiry and confirm what they require
Case Reference number	to be able to identify you via HMRC correspondence
Contract of Employment	to understand what arrangement you belonged to
Loan Agreement	to be able to acknowledge you received loans
Expense invoices/receipts	to understand if these were reimbursed or are still outstanding
Bank statements	to cross-reference payments received
Tax returns	to understand what has and has not already been declared to HMRC
P45/P60/P11D	to understand when employments began and ended as well as any benefits received
Payslips	to acknowledge what salary payments have been paid
Country of residence	to understand if you are liable to pay certain taxes to UK

## Personal Data - Accountancy Services

Proof of ID and 2x proof of address	for us to fulfil our 'KYC' (Know Your Customer) requirements
Contact details	including but not limited to phone number and email address to be able to keep in contact with you
National Insurance number	for us to fulfil our 'KYC' requirements
Tax Code	to fulfil contractual obligations and process payments
Job Title	to fulfil our 'KYC' requirements
Bank Details	to fulfil contractual obligations
DOB	to fulfil our 'KYC' requirements and for accountancy obligations
Marital Status	for accountancy obligations
Tax returns	to understand what has and has not already been declared to HMRC
P45/P60/P11D	to understand when employments began and ended as well as any benefits received
Client Limited Company Name	for accountancy purposes
Tax Reference Number	for accountancy purposes
VAT Details	this is information can also be gathered from the HMRC portal and is used for accountancy purposes
Corporation Tax information	this information can be gathered from the HMRC portal and is used for accountancy purposes
Employment terms	including information regarding if this is now your only job, your normal hours of work, date your employment commenced - to create the correct tax code
Country of Residence	for Companies House registration
Client company details	including: company accounts, bank statements, VAT returns, company receipts, company sales invoices, company UTR number, company VAT registration number and CT 600 tax return forms - for accountancy purposes

**\*\*NB\*\*** We may at other times request further information pertaining to your accounts or enquiry. Any additional information requested will be handled in the same secure way and will only be used in relation to the service we provide you and for no other purpose.

## Personal Data Storage

We believe in maintaining privacy for all our clients and know it is key in gaining trust. Any and all documentation and data we receive about our clients, are securely stored in password protected folders on our internal server. We have a separate CRM system, accounts system and bookkeeping system which also stores personal data and details; all of which are password protected and only accessible by employees of AS Advisors on a need to know basis.

Some systems store information on a server outside of the EEA, but this is in a jurisdiction with an adequate data protection policy as deemed by the European Data Protection Board.

We do not store any paper or hard copies of any information that we may receive via post. Any mail we receive into the office is scanned and saved onto the client's personal folder, with the subsequent hard copy placed in our locked shredding container.

We maintain all personal records for no longer than 6 years or as is reasonably expected to be maintained in order to deal with any tax enquiry or accounts service.

Should you request for your information to be removed prior to the end of the 6-year term, this will be acted upon under the terms of General Data Protection Regulation (GDPR).

## Personal Data Requests

Should you wish to request access to your personal data we have on file, please send an email to [enquiries@asadvisors.co.uk](mailto:enquiries@asadvisors.co.uk)

Should you require your personal data to be updated or rectified this can be done by emailing a request and description of said updates to [enquiries@asadvisors.co.uk](mailto:enquiries@asadvisors.co.uk).

If you would like us to remove or delete the data we have held on file; you will be required to send a request through to [enquiries@asadvisors.co.uk](mailto:enquiries@asadvisors.co.uk). In compliance with GDPR any data requested to be removed will be dealt with, with the utmost security.

All documents we hold on file will be shredded using a reputable commercial shredding company in lockable bins who provide certificates of destruction. All information held on internal computers will be permanently removed using a computer app that deals specifically with cleaning up free space allowing it to be unrecoverable.

## Time Frames

Any correspondence in relation to data protection and request of access rights will be responded to within 30 days.

## Complaints procedure

If you wish to make a complaint about the way your data has been handled or have any queries/issues in relation to your data protection rights, please email our Data Protection Officer at [caitlin@asadvisors.co.uk](mailto:caitlin@asadvisors.co.uk). The Data Protection Officer will then keep you informed on the progress of the outcome and remedy of the complaint.

Any complaint not dealt with within 3 months, has the right to a judicial remedy.

\*For further information as to your right to make a complaint please view Article 77 of the GDPR and Recital 141.

## Data Protection Officer “DPO”

The Data Protection Officer for AS Advisors Limited is Caitlin Dancox.

## Profiling

In order to fulfil our requirements under ‘Know Your Customer’ ‘KYC’, we will use your personal information to run a background and identity check on you.

Using the information you provide us, we will utilise a Global Identity Database provided by GBG. This system is run by employees of the Company and no details will be sent to a third party to run the verification on our behalf.

However please note the information gathered from the check, will be stored on a log/report on our GBG portal for any future reporting or referencing to.