

Steve Astbury Ltd is a Limited Company registered in England and Wales with registered number 4083547 with offices in Heywood. A list of members' names and their professional qualifications is available for inspection at 9 Manchester Road, Heywood, Lancashire OL10 2DZ, the firm's principal place of business and registered office.

In accordance with the disclosure requirements of the Services Regulations 2009, our professional indemnity insurer is Hiscox Insurance Company Ltd, 1 Great St Helen's London EC3A 6HX. The territorial coverage is worldwide excluding USA and Canada.

Steve Astbury & Partners Ltd is a Limited Company registered in England and Wales with registered number 6741234 with offices in Heywood. A list of members' names and their professional qualifications is available for inspection at 9 Manchester Road, Heywood, Lancashire OL10 2DZ, the firm's principal place of business and registered office.

In accordance with the disclosure requirements of the Services Regulations 2009, our professional indemnity insurer is Hiscox Insurance Company Ltd, 1 Great St Helen's London EC3A 6HX. The territorial coverage is worldwide excluding USA and Canada.

Steve Astbury Ltd – Website usage terms and conditions.

Welcome to our website. If you continue to browse and use this website, you are agreeing to comply with and be bound by the following terms and conditions of use, which together with our privacy policy govern Steve Astbury Ltd's relationship with you in relation to this website. If you disagree with any part of these terms and conditions, please do not use our website.

The term 'Steve Astbury Ltd' 'Steve Astbury & Partners' or 'us' or 'we' refers to the owner of the website whose registered office is 9 Manchester Road, Heywood, Lancashire OL10 2DZ. Steve Astbury Ltd & Steve Astbury & Partners Ltd are a limited companies registered in England and Wales with offices in Heywood. The term 'you' refers to the user or viewer of our website.

The use of this website is subject to the following terms of use:

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- Your use of this website and any dispute arising out of such use of the website is subject to the laws of England, Northern Ireland, Scotland and Wales.

Privacy Policy

Last Updated 24th May 2018

Steve Astbury Ltd & Steve Astbury & Partners Ltd is committed to the protection of any data that we have collected as part of our normal business activities. We understand the importance of privacy and have worked towards ensuring we comply with the General Data Protection Regulation (GDPR).

Please read this Privacy Policy to learn about your rights, what personal data that we collect and process, how we use that data, how long we hold it for and how we protect it.

This website is operated by Steve Astbury Ltd (“Steve Astbury Ltd”, “we” or “us”), a UK limited Company.

1. Who are we?

This Privacy Policy applies to Steve Astbury Ltd & Steve Astbury & Partners Ltd.

2. Who can you contact for privacy questions or concerns?

If you have queries or comments regarding this Privacy Policy or how we process personal data, please direct your correspondence to:

The Data Protection Officer,
Steve Astbury Ltd or Steve Astbury & Partners Ltd

9 Manchester Road, Heywood, Lancashire OL10 2DZ

Alternatively, you can email accounts@steveastbury.co.uk. We aim to respond to any privacy related correspondence within 20 working days from the date we receive the request.

You may also contact the UK Information Commissioner’s Office at <https://ico.org.uk/concerns/handling/> to report any concerns you may have about our data handling practices.

3. How is personal data collected?

Directly. Data can be collected directly from individuals in a range of methods. These include from contacts who supply a business card or fill out online forms, subscribe to newsletters, register for webinars or attend meetings and events we host, visit our offices or apply for jobs with the firm. We can also acquire personal data directly when we are

establishing a business relationship or carrying out contractual obligations supplying professional services.

Indirectly. We collect personal data indirectly about individuals from a wide array of sources, which can include recruitment agencies and our clients. We may record personal data onto our client data records to better facilitate services for our business clients, subscribers and individuals, or to satisfy a legal obligation, or for our legitimate interests.

Publicly available information — Personal data can be acquired from a variety of public registers, news articles, Internet searches and other publicly available resources.

Business clients — Our corporate and business clients engage with us to perform professional services on their behalf, some of which involve sharing personal data that they are the data controller for, as a function of the engagement. Eg we review payroll information as a necessary element of an audit and we often need to use personal data to complete tax returns and R&D tax claims. Our services may also include processing personal data under our clients' control on our hosted software applications, which may be governed by different privacy terms and policies.

Social Media Networking — If you log in to any of our group websites using social media platforms such as Google, LinkedIn or Twitter to authenticate on the site and connect your social media information to ourselves, we will collect the information or content required for the registration or login process that you have expressly permitted your social media platform is able share with ourselves. That information may include your name and email address and, depending on your privacy settings within the application or platform, further details about you. We advise, therefore, you review the privacy controls on the relevant social media platform to choose how much information you are happy to share with us.

4. **What categories of personal data are collected?**

We may collect the following categories of personal data about individuals through direct interactions with ourselves, or from information provided through normal client engagements, from our suppliers, from job candidates and through other methods including those described within this Privacy Policy.

Personal data. Here is a list of commonly collected personal data we process in order to conduct our business activities.

- Contact details such as name, title, firm name, job title, mobile 'phone number, work & personal emails and postal address
- Professional details such as educational background and professional memberships, published articles, job and career history
- Family and beneficiary details for insurance and pension planning services such as names and dates of birth
- Financial information such as tax codes, bank details, National Insurance number, payroll information, investments, pension details, comprehensive assets lists, insolvency records and tax planning details.

Sensitive personal data. We normally do not collect sensitive or special categories of personal data regarding individuals. If we do have a requirement to process sensitive personal data, it is only carried out with the consent of the individual, unless it is obtained indirectly for legitimate purposes.

Special Categories of Personal Data we may collect include:

- Expense receipts required for individual tax or accounting advice that may indicate membership of trade unions or indicate political opinions.
- ID documents that may reveal race or ethnic origin, and possibly biometric data of private individuals, beneficial owners of corporate entities, or applicants.
- Adverse information about potential or existing clients and applicants that may reveal criminal convictions or offences information.
- Information normally provided to us by our clients in the course of a professional engagement.
- Dietary preferences or access requirements when registering for events that reveal religious beliefs or health related information.

5. What is the lawful basis on which we process personal data?

We rely on the following lawful bases when collecting and using personal data to carry out our business operations and provide products and services:

- Contract – We may process personal data in order to perform our contractual obligations.
- Consent – We may rely on your freely and unambiguously provided consent supplied at the time you provided your personal data to us.
- Legitimate interests – We may rely on legitimate interests based on our assessment that the processing is fair, reasonable and balanced. These include:
 - *Delivering services to our clients* – To provide the professional services our clients have engaged us to under the terms of that engagement.
 - *Direct marketing* – To provide insights into current trends and future movements in related areas of interest and speciality knowledge we consider is beneficial to our business clients, subscribers and individuals who have interacted with us.
- Legal obligations and public interests – We may also process personal data as a requirement to comply with regulatory obligations or public interest requirements.

6. Why are we collecting and processing personal data?

We collect personal data for any number of reasons but each of these reasons should be transparent and evident to the data subject. Reasons for we use your personal data include.

- Provision of professional advice and delivering reports related to our tax, advisory, audit and assurance, pension scheme administration, restructuring, mergers and acquisitions and other professional services. Our services may include reviewing client files for quality assurance purposes, which may involve processing personal data for the relevant client.
- Promoting our professional services, products and capabilities to existing and prospective business clients.
- Sending invitations and providing access to guests attending our events and webinars or our sponsored events.
- Personalising online landing pages and communications we think would be of interest based on interactions with us.
- Administering, maintaining and ensuring the security of our information systems, applications and websites.
- Authenticating registered users to certain areas of our sites.
- Seeking qualified job applicants, and forwarding applicant career inquiries to our HR team.

- Processing online requests, including responding to communications from individuals or requests for proposals and quotations.
- Contacting journalists regarding company press releases and highlighting messages that may be of interest on specific industry topics.
- Travel arrangement assistance.
- Complying with legal and regulatory obligations relating to countering money laundering, terrorist financing, fraud and other forms of financial crime.

7. **Do we share personal data with third parties?**

We may, on occasion, share personal data with trusted third parties to help us deliver efficient and quality services. These recipients are contractually bound to safeguard the data we entrust to them. We may engage with several or all of the following categories of recipients:

- Where necessary for administrative purposes and to provide professional services to our clients.
- Parties that support us as we provide our services (e.g., providers of telecommunication systems, mailroom support, IT system support, archiving services, document production services and cloud-based software services).
- Our professional advisers, including lawyers, auditors and insurers.
- A potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger/acquisition of part or all of our business or assets, or any associated rights or interests.
- Marketing services providers.
- Law enforcement or other government and regulatory agencies (e.g., HMRC) or to other third parties as required by, and in accordance with, applicable law or regulation.
- Recruitment services providers.

8. **Do we transfer your personal data outside the European Economic Area?**

We store personal data on servers located in the European Economic Area (EEA).

9. **Do we use cookies?**

Our websites may use cookies. Where cookies are used, a statement will be sent to your browser explaining the use of cookies. To learn more, please refer to our cookie policy.

10. **What are your data protection rights?**

Your data protection rights are highlighted here.

- Access – You can ask us to verify whether we are processing personal data about you, and if so, to provide more specific information.
- Accuracy – You can ask us to correct our records if you believe they contain incorrect or incomplete information about you.
- Erasure – You can ask us to erase (delete) your personal data after you withdraw your consent to processing or when we no longer need it for the purpose it was originally collected.
- Processing restrictions – You can ask us to temporarily restrict our processing of your personal data if you contest the accuracy of your personal data, prefer to restrict its use rather than having us erase it, or need us to preserve it for you to establish, exercise, or defend a legal claim. A temporary restriction may apply while verifying whether we

have overriding legitimate grounds to process it. You can ask us to inform you before we lift that temporary processing restriction.

- Data portability – In some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another company if it is technically feasible.
- Automated Individual Decision-making – You can ask us to review any decisions made about you which we made solely based on automated processing, including profiling, that produced legal effects concerning you or similarly significantly affected you.
- Right to Object to Direct Marketing including Profiling – You can object to our use of your personal data for direct marketing purposes, including profiling. We may need to keep some minimal information to comply with your request to cease marketing to you.
- Right to Withdraw Consent – You can withdraw your consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or services to you and we will advise you if this is the case.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. This helps us to ensure that personal data is not disclosed to any person who has no right to receive it. No fee is required to make a request. Depending on the circumstances, we may be unable to comply with your request based on other lawful grounds.

11. How is personal data secured?

We have put appropriate technical and organisational security policies and procedures in place to protect personal data (including sensitive personal data) from loss, misuse, alteration or destruction. We aim to ensure that access to your personal data is limited only to those who need to access it. Those individuals who have access to the data are required to maintain the confidentiality of such information. We may apply a process called pseudonymisation, de-identification and anonymisation techniques in efforts to further protect your personal data.

12. How long do we retain personal data?

We retain personal data to provide our services, stay in contact with you and to comply with applicable laws, regulations and professional obligations that we are subject to. Unless a different time frame applies as a result of business need or specific legal, regulatory or contractual requirements, where we retain personal data in accordance with these uses, we retain only the necessary personal data for those requirements for seven years. We will dispose of personal data in a secure manner when we no longer need it.

13. Do we link to other websites?

Our websites may contain links to other sites, including sites maintained by other Cowgill member firms that are not governed by this Privacy Policy. Please review the destination websites' privacy policies before submitting personal data on those sites. Whilst we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other sites.

14. Do we change this privacy policy?

We regularly review this Privacy Policy and will post any updates to it on this webpage.
This Privacy Policy was last updated 24th May 2018.