

## Confluence Tax LLP's Privacy Policy

### 1. This policy

- 1.1. Confluence Tax LLP (**We**) are the data controller in relation to personal data (**Data**) we collect from you.
- 1.2. We are committed to protecting and respecting your privacy.
- 1.3. We are registered in England and Wales under number OC357330 and have our registered office at 1010 Cambourne Business Park, Cambourne, Cambridgeshire, England CB23 6DW. We can be contacted at emma@confluencetax.com and on +44(0)7730 278499.
- 1.4. This policy sets out the basis on which we will process any Data we collect from you, or that you provide to us, or that we receive from other sources. Please read the following carefully to understand our views and practices regarding your Data and how we will treat it.

### 2. Information we collect from you

- 2.1. We will collect and process the following Data about you:
  - 2.1.1. **Information you give us.** This is information about you that you give us by filling in forms on our website (**our site**) or by corresponding with us by phone, e-mail and other electronic communication and by post, or otherwise. The information you give us may include your name, address, e-mail address phone number, financial and credit card information.
  - 2.1.2. **Information we collect about you.** This includes information about your visit to our website. We will automatically collect technical information and information about your visit including, but not limited to traffic data, location data, weblogs and other communications data and the resources that you access.
- 2.2. Collecting this Data is essential to us being able to supply high quality tax advice.

### 3. Cookies

- 3.1. Our website uses cookies to distinguish you from other users of our site. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. These cookies allow us to distinguish you from others users of our website, which helps us to provide you with a good experience when you browse our website and allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.
- 3.2. We may use the following cookies:
  - 3.2.1. **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
  - 3.2.2. **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
  - 3.2.3. **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.
- 3.3. Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

- 3.4. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.
- 3.5. Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Data to these websites.

#### **4. How we use your information**

- 4.1. A key requirement of UK Data Protection law is that we have a lawful basis for each aspect of processing of your Data.
- 4.2. Where Data is collected for the purpose of **fulfilling a contract with you**, we will use your Data on the basis that processing is necessary to fulfil that contract, which may include the following types of processing:
  - 4.2.1. To deliver services which have been ordered by you;
  - 4.2.2. To ensure that content from our site is presented in the most effective manner for you and for your computer;
  - 4.2.3. To carry out our obligations arising from any contract entered into between you and us (including for the purposes of debt collection); and
  - 4.2.4. To notify you about changes to our service.
- 4.3. Where we are required to process Data in order to comply with our **legal obligations**, we will use your Data on the basis that it is necessary to do so for the purposes of legal compliance, which may include storing your Data in order to establish, exercise or defend legal claims within the relevant statutory limitation periods.
- 4.4. Where we have a **legitimate interest** (which you may object to at any time as set out in paragraph 7 below) to process Data, we will use your Data on the basis that we have legitimate interest to do so which is not overridden by your rights and freedoms, which may include the following types of processing:
  - 4.4.1. To provide you with information, updates or services that you request from us or which we feel may interest you;
  - 4.4.2. To invite you to events organised by Confluence Tax which we which we feel may interest you; and
  - 4.4.3. To allow you to participate in interactive features of our service, when you choose to do so.
- 4.5. We will never sell your information to third parties. However, we may disclose your personal information to third parties in the following circumstances:
  - 4.5.1. In the event that we sell any of our business or assets, in which case we may disclose your Data to the prospective buyers of such business or assets and to their legal advisers;
  - 4.5.2. In the event that we appoint a third party data processor to process your Data in accordance with our documented instructions and with the requirements of UK Data Protection law;
  - 4.5.3. If we are under a duty to disclose or share your Data in order to comply with any legal obligation;

- 4.5.4. If it is necessary to disclose your Data to our professional advisers (for example, to our legal advisers or our accountants); and
- 4.5.5. If it is necessary to do so in order to enforce or apply our terms and conditions of supply (if applicable) or to protect the rights, property, or safety of Confluence Tax LLP, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction and exchanging information with debt recovery agencies.

## **5. Where we store your Data**

- 5.1. We will take all steps reasonably necessary to ensure that your Data is treated securely and in accordance with UK Data Protection law.
- 5.2. All information you provide to us is stored securely.
- 5.3. The Data that we collect from you will be transferred to, and stored at, a destination inside the European Economic Area (“**EEA**”). We will ensure that any transfer of Data outside the EEA are only made to those states which the European Commission has deemed to have adequate data security protection or which are otherwise permitted under UK Data Protection law.
- 5.4. Unfortunately the transmission of information via the internet is not completely secure. Although we will do our best to protect your Data, we cannot guarantee the security of your Data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **6. How long we keep your Data**

- 6.1. We will process your Data for no longer than is reasonably required. We consider this to be the amount of time that we need your Data in order for any processing which is carried out on the basis of one or more lawful basis set out in paragraph 4 above.

## **7. Your rights**

- 7.1. In order to exercise any of your rights, please write to us at our registered office, contact us by telephone or email us using the details set out in paragraph 1 above.
- 7.2. You have the right to ask us not to process your Data for marketing purposes. You may object to our use of your Data for marketing purposes contacting us and informing us that you object to our processing of your Data for marketing purposes.
- 7.3. In respect of processing which we carry out on the basis that we have a legitimate interest, you may object to our processing for specified purposes or at all at any time. You may object by contacting us and informing us that you are objecting to processing for one or more of the purposes for which we have legitimate interest to process your Data.
- 7.4. In respect of processing which we carry out on the basis that you have given consent, you have the right to withdraw consent to our processing for specified purposes or at all at any time. You may withdraw consent by contacting us and informing us that you are withdrawing your consent for one or more of the purposes for which consent was given.
- 7.5. You may request to have any incorrect information corrected or to have your information deleted.
- 7.6. You have the right to request a copy of information held about you by us. Generally we will provide this information free of charge, however in certain circumstances we reserve the right to charge a reasonable fee to meet our costs in providing you with details of the information we hold about you in accordance with UK Data Protection law.

7.7. In certain circumstances, you have the right to require us (and our third party data processors) to erase your Data without undue delay, although we reserve the right not to erase Data (or to inform our third party data processors) where processing remains necessary for purposes which are permitted by UK Data Protection law.

7.8. You have the right to request that your Data is made portable for the purposes of transferring Data to another supplier in relation to:

7.8.1. Data which you have provided to us;

7.8.2. Data which is processed on the basis of your consent or the performance of a contract; and

7.8.3. Data which is processed by automated means.

## **8. Right to lodge a complaint**

8.1. We will endeavour to only use Data that is relevant to our purpose and to ensure your Data is kept secure however sometimes errors occur. If you wish to raise a complaint on how we have handled your Data, you can contact Emma Dahm who will investigate the matter – email [emma@confluencetax.com](mailto:emma@confluencetax.com), tel +44(0)7730278499. If you are not satisfied with our response or believe we are not processing your Data as required by law, you can contact the Information Commissioners Office on 0303 123 1113.

## **9. Changes to our privacy policy**

9.1. Any changes we make to our privacy policy in the future will be posted on our website, and where practicable, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## **10. Contact**

10.1. Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to our registered office or by telephone or email to us using the details set out in paragraph 1 above.