

Privacy Notice

Last updated: July 2018

We take data protection seriously and this Privacy Notice explains how we use any personal information we collect about you – our prospective or existing customer.

Who is collecting your personal information?

PayStream Accounting Services Limited is collecting your personal information, which we refer to as 'us,' 'we' and 'PayStream' in this Privacy Notice. PayStream is part of the PayStream MyMax Holdings group. PayStream Accounting Services provides you with personal tax services, or as otherwise described in the Engagement Letter, Service Description Schedule and Terms of Engagement, together the "Contract."

Where will my personal information be stored?

PayStream has its own secured MS SQL server databases that are hosted in the UK (Altrincham & Manchester). PayStream will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

What personal information is collected about you?

You have or will provide us with personal information. This includes but is not limited to:

- Personal details, including name, personal address, nationality, gender, date of birth and NI number;
- Contact details and preferences, including mobile, home and work phone number (where applicable) and email addresses;
- Details from your passport and/or driving licence (and additional right to work documentation where applicable) to carry out identity checks;
- All incoming and outgoing calls are recorded for quality, audit and training purposes;
- All incoming and outgoing emails that you send to us from a known email address are recorded for quality, audit and training purposes;
- We have an internal IT system we call 'CRM.' This logs your journey with PayStream, from when you first engage with us. Furthermore, internal staff also use this system to make notes. If for example, you call up with a query, we may record this activity on the system for quality and audit purposes. This also helps us to provide you with a personal service.
- If you visit our website, we collect information about the Internet Protocol (IP) address of your device used to access the site. This helps us to monitor the level of activity and service we provide. You can find more information about this on our website.

Why is your personal information needed?

We process your personal information because it is necessary to do so in the performance of the Contract to which you are a party, or in order to take steps at your request prior to entering in the Contract. Your personal information will be needed to:

- Where necessary register you with HMRC;
- Process your information (which may include personal information) for tax and reporting purposes;
- Supply you with any services or additional services that you purchase;
- Send you statements and invoices;
- Take details and manage complaints;
- Any other processing required to fulfil our contractual obligations;
- To keep you informed and updated on any aspect of the service(s);
- Send you marketing communications (in accordance with your contact preferences);
- Prepare your personal tax return.

Some processing of your personal information may be necessary for the purposes of our legitimate interests. We may ask you to participate in surveys, although this will be voluntary. We use surveys to get your feedback and make continuous improvements to PayStream. In the unlikely event that you owe us money, we will take steps to recover our funds which may involve sending your information to an external debt collection agency. We currently use Hilton-Baird Collection Services Limited which is part of the Hilton-Baird Group. Furthermore, where you owe us money but we cannot locate you, we will send your name, contact details (phone and email), date of birth, National Insurance number and date of last contact (if any) to Global Investigations Limited for use of their tracing service.

In addition to the processing and disclosures reasonably necessary for the purposes identified elsewhere in this Privacy Notice, PayStream may disclose your personal information to the extent that it is required to do so by law and in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend its legal rights.

We hold your personal information until the end of the 6th financial year following the end of your engagement. We hold your personal information securely to deal with contract, insurance and tax queries, complaints or claims and to meet any legal requirements, including those relating to the Money Laundering Regulations 2007.

How will we collect your personal information?

Generally, we will collect personal information directly from you and we will also create some personal information internally.

You may have contacted us directly, either via our website or otherwise. In order that we can get you set up quickly, we will call, text and email you reminders to join us and/or otherwise, to encourage you to accept the Contract.

Who else sees your personal information and why?

In certain circumstances, we may need to share your information with others. With whom we share your information and the reasons behind this are as follows:

To comply with our legal obligations:

- We may disclose your personal information to any member of our group, which means our

subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply terms of use or other agreements; or to protect the rights, property, or safety of PayStream, our employees, customers or others. This includes exchanging information with other companies and organisations for the purposes of the detection and prevention of crime (including financial crime and fraud), credit risk reduction, our insurance broker (Jelf Insurance Brokers Limited) and insurance underwriters.

Additional processing that we carry out in our legitimate interests:

- In the event that we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets. If PayStream or substantially all of its assets are acquired by a third party, personal data held by it will be one of the transferred assets.
- We may share your information with the recruitment business or other intermediary for which we hold a contract for the provision of your services for the purposes of compliance with a contract or any other legal obligation such as adherence to the Onshore Employment Intermediaries 2014 rules (section 44 of Chapter 7, Part 2 of ITEPA 2003).
- We use an email marketing software from Adestra Limited ("Adestra"). Adestra help us to manage and send out emails and marketing campaigns in an efficient, targeted, secure and easy way. It involves uploading your name, email address and the internal ID we have allocated you.
- We use Mimecast UK Limited to sanitise, secure and archive all inbound, internal and outbound emails. All emails undergo various best practices checks / processes and the content is scanned for malicious content / markers.
- During busy periods, we use trusted and vetted sub-contractor(s) to help us complete personal tax returns and services. If you would like a current list of sub-contractors, please contact us.
- We use Shred-IT Limited for document destruction services. They help ensure that client, employee and confidential business information is kept secure at all times. Visit <https://www.shredit.co.uk/en-gb/home> for more information.
- IRIS Software: we use IRIS Software Studios, an independent software company, to submit personal tax returns to HMRC. The personal information processed is your name, date of birth, gender, National Insurance number, address and the statutory information in connection with your income, gains claims and other information necessary to determine your personal tax liability.
- Daviker Software: we use Daviker software to process your tax returns through the tax return preparation cycle.

In the scenarios described below, we will also share personal information with the following companies. You will note that we don't automatically share your personal information with these companies, and only do so with your consent:

- Haven Global Strategies: Haven Global Strategies Ltd is an appointed representative of Intrinsic Financial Planning Limited and Intrinsic Mortgage Planning Ltd, who are authorised and regulated by the Financial Conduct Authority. Haven provide financial planning services, including but not limited to pension planning, life assurance, income protection, advice on investments and regular savings and mortgages. If we feel you will benefit from any service that Haven provide, we will speak to you about them. If you would like to use Haven, we will pass over your name, email address and telephone/mobile number.

Your rights

You have a number of rights in respect of your personal information. You have the right to request a copy of

the information that we hold about you. If you would like a copy of some or all of your personal information, please email tax@paystream.co.uk

We want to make sure that your personal information is accurate and up to date. Please ask us to correct or remove information you think is inaccurate. We will only use your personal information as we have described in this Privacy Notice, but, in the unlikely event that we need to use it in a different way, we will provide you with an updated Privacy Notice.

Where we have based our processing on our legitimate interests, you do have the right to object to the processing or restrict us processing your information in this way. In this case, we will need to demonstrate to you that our legitimate interests are sufficiently compelling to override your interests or rights, or that purpose is to establish or defend legal claims.

You have the right to erasure, although this does not provide an absolute 'right to be forgotten' and applies only in these specific circumstances: where your personal information is no longer necessary in relation to the purpose for which it was originally collected/processed, you withdraw consent, you object to the processing and there is no overriding legitimate interest for continuing the processing, we unlawfully processed your personal information and, where your personal information has to be erased in order to comply with a legal obligation.

Where we have based our processing on the performance of a contract, you will have the right to receive this information from us in a structured, commonly used way and have the right to send this to someone else.

If you are unhappy with the way we use your personal information, you can make a complaint to us directly or to the Information Commissioner's Office (ICO). You can visit this website: <https://ico.org.uk/concerns/>

Changes to our Privacy Notice

We keep our Privacy Notice under regular review and should we change it, we will provide you with an updated copy.

How to contact us

If you have any questions about our Privacy Notice or the information we hold about you, please contact tax@paystream.co.uk or write to the Tax Team at PayStream, Mansion House, Manchester Road, Altrincham, WA14 4RW