

Privacy policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users.
- 1.2 This policy applies to the personal data that we collect from our website visitors and service users.

2. About Us

- 2.1 This website is owned and operated by Bob Rehill Limited trading as Bob Rehill & Associates.
- 2.2 In this policy, "we", "us" and "our" refer to Bob Rehill & Associates.
- 2.3 We are registered in England and Wales under registration number 4213317, and our registered office and principal place of business is at Bob Rehill Ltd, Kenward House, High Street, Hartley Wintney, Hampshire, RG27 8NY.
- 2.4 If you have any queries or concerns regarding this Privacy Policy or how we manage your personal data please contact our Data Protection Representative by email at admin@bobrehill.com or by writing to us at the address in 2.3. Please clearly mark all correspondence mark for the attention of the Data Protection Representative.

3. What data do we hold about you, how have we obtained it and what is the legal basis for processing the data?

- 3.1 We process your personal data if we understand that you may be interested in engaging with us to provide you with services. In this section, we provide more detailed information about how we will manage your personal data.
- 3.2 When you visit our website, we may automatically collect and process data about you and your use of our website ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. We collect some of this information using cookies – please see the Cookies section below for further information. We may also collect any personal information which you allow to be shared that is part of your public profile on a third party social network. We collect this information for our legitimate interests.
- 3.3 We may process your account data ("**account data**"). The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.
- 3.4 We may process your information included in your personal profile on our website ("**profile data**"). The profile data may include your name, address, telephone number, email address, educational details and employment details and any other data that you have included in the documents you provide to us as part of your application. The profile data may be processed for [the purposes of

enabling and monitoring your use of our website and services. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

- 3.5 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include your name and contact details. The source of the service data is you. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.
- 3.6 We may process information contained in any enquiry you submit to us regarding our services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant services to you. We will process this information where we have your consent.
- 3.7 If you are our client or prospective client we may process information relating to our customer relationships, including customer contact information ("**customer relationship data**"). The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you that you provide to us during the course of engaging with us for services or that is provided to us by our client (typically your employer). The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers. The legal basis for this processing is our legitimate interests, namely [the proper management of our customer relationships.
- 3.8 We may also process any of your personal data where such processing is necessary in order to protect your vital interests or the vital interests of another natural person.
- 3.9 We may also process your information to comply with **legal obligations** including assisting HMRC and the Police.
- 3.10 We may process your information to allow us to pursue our **legitimate interests** including for:
 - i. analysing our performance to further improve our services;
 - ii. market research, training and to administer our websites;
 - iii. the prevention of fraud or other criminal acts;
 - iv. complying with requests from you including if you exercise any of your rights noted in this Privacy Policy;
 - v. the purpose of corporate restructure or reorganisation or sale of our business or assets;
 - vi. engaging with our professional advisors for services; and
 - vii. enforcing our legal rights or to defend legal proceedings and for general administration purposes.

4. Will your personal data be shared with another party?

- 4.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy. Information about our group of companies is available on request.
- 4.2 We may disclose your personal data to professional advisers and service providers e.g. payroll agency, accountants, legal advisors, insurers insofar as reasonably necessary for the purposes of professional advice and services and for general business management purposes.
- 4.3 We may disclose your personal data to government bodies or other official bodies where such disclosure is necessary to comply with our legal obligations, for enforcing our rights or for the prevention or detection of a crime.

5. Transferring your data outside the United Kingdom

- 5.1 We do not transfer your personal data outside the United Kingdom. In the event that we need to transfer your personal data outside of the EEA we will only do so under the following circumstances: (i) where the transfer is to a country or other territory which has been assessed by the European Commission (or an equivalent UK body) as ensuring an adequate level of protection for personal data; (ii) with your consent; or (iii) on the basis that the transfer is otherwise compliant with the GDPR and other applicable laws.

6. How Long do we keep your data?

- 6.1 If you have expressed an interest in receiving our services, partnering with us or in being employed or otherwise engaged by us or our clients, we will retain your personal data for 1 year since we last had contact with you.
- 6.2 If you have received services from us, provided services to us or are employed by us or are otherwise engaged with us we will retain your personal data for 2 years since we last had contact with you (including the life of any contract we hold with you).
- 6.3 If you have requested that we do not send you marketing information we will always retain sufficient information to ensure that we remember to comply with your request.
- 6.4 We may also retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. Data Security

- 7.1 We have adopted the technical and organisational measures necessary to ensure the security of the personal data we collect, use and maintain, and prevent their alteration, loss, unauthorised processing or access, having regard to the state of the art, the nature of the data stored and the risks to which they are exposed by human action or physical or natural environment. However, as effective as our security measures are, no security system is impenetrable. We cannot guarantee the security of our database.

7.2 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use procedures and security features to try to prevent unauthorised access

8. Cookies

8.1 We use Cookies on our website. A cookie is a small text file which is placed onto your computer (or other electronic device) when you visit our website. This enables us to monitor how many times you visit the website, which pages you go to, traffic data, location data and the originating domain name of your internet service provider.

8.2 You can find out more about the Cookies we use in our Cookies Policy available on the home page of our website.

8.3 You can set your browser not to accept cookies, however some of our website features may not function as a result.

8.4 For more information about cookies generally and how to disable them you can visit: www.allaboutcookies.org.

9. Your Rights

8.1 In this Section 8, we have summarised the rights that you have under data protection law.

8.2 **Right to Access Data.** You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information by making a "Subject Access Request". That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. If you would like to make a Subject Access Request, please contact us at set out in 2 above and clearly mark your correspondence as "Subject Access Request" and for the attention of the Data Protection Representative. Unless we agree a different time frame we will complete your request within one month.

8.3 **Right to Restrict Data.** You have the right to have any inaccurate personal data about you rectified and have the right to restrict our use of your personal data until we have done so. You also have the right to request that the data is restricted where you have a right to it being deleted but would prefer that it is restricted.

8.4 **Right to be Forgotten.** Where we hold personal data about you but it is no longer necessary for the purpose for which it was collected and cannot be otherwise justified, you have the right to the erasure of your personal data without undue delay.

8.5 **Marketing Communications.** You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

8.6 **Transferring your Data.** Where we rely on your consent to process your personal data or that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract you have the right to receive your personal

data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

8.7 **Right to Complain.** If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with the data regulator in the UK, the [ICO](#), or any other supervisory authority responsible for data protection.

9. **Policy Updates.**

9.1 We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this policy.

This policy was last updated on 25th November 2019.