

Privacy Policies

We take your privacy and data security very seriously and you can find out more about how we do this in our privacy policies below.

- Privacy Policy for Website

JPC Financial Ltd (“We”, “Us” and “Our”) is committed to protecting and respecting your privacy.

This policy (together with our terms of use policy and any other documents referred to on it) sets out the basis for which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection laws (the data controller is JPC Financial Ltd of 2nd Floor Lynton House, Station Approach, Woking, Surrey GU22 7PY (ICO Registration Number: Z8571704).

What information do we collect about you?

Information you give us. We may process information you have given us by filling in forms on our website www.jpc.co.uk (“our site”) or by corresponding with us by phone, email or otherwise. This includes information you provide when you register to receive accounting updates, search our site and when you report a problem with our site.

This information may include your name, address, e-mail address, phone number, marital status and employment details.

Information we collect about you. With regard to each of your visits to our site we may automatically collect the following information:

- technical information, including the Internet Protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types; and
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products viewed or searched for; page response times, download errors, lengths of visits to certain pages, page interaction (such as scrolling, clicks and mouse-overs), methods used to browse away from the page and any phone number used to call us.

Information we receive from other sources. We may process information about you received from your usage of any of the other services we provide. We may also receive information about you from the third parties we work closely with (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytical providers, search information providers and credit reference agencies).

Please avoid supplying us with any other person's personal data, unless we have requested you to do so.

Purpose - how will we use your personal information?

We will only use your information when it is fair and lawful to do so. Most commonly, we will use your personal information in the following circumstances:

1. Where it is necessary for our legitimate interests (or those of a third party) namely providing you with information that you request and with updates and marketing materials and enabling the management of all matters relating to our business, but only where your interests and fundamental rights do not override those interests.
2. Where you have given your consent and that consent has not subsequently been withdrawn by you.

We may also use your personal information in the following circumstances, which are likely to be rare:

3. Where we need to protect your interests (or someone's interests).
4. Where it is needed in the public interest.

The information we collect about you may be used in the following ways,

Information you give us.

- to carry out our obligations to you and to provide you with the information and services that you request from us;
- to invite you to events or seminars that may be of interest to you;
- to provide you with updates about accounting and other topics that may be of interest to you;
- for marketing and advertising purposes; and
- to ensure that content for our site is presented in the most effective manner for you and for your computer.

Information we collect about you. We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to ensure the security of our website and services.

Information we receive from other sources. We may use the information combined with information you give to us and information we collect about you for the purposes set out above (depending on the types of information we receive).

Disclosure of your information

We may share your personal information with any member of our staff, which means our ultimate holding company, as defined in section 1159 of the UK Companies Act 2006, where this is reasonably necessary, for the purposes set out in the policy.

We may share your information to third parties where this is reasonably necessary, for the purposes set out in the policy including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If JPC Financial Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its clients and contracts will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of business and other agreements from time to time; or to protect the rights, property, or safety of JPC Financial Ltd, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Transfer and storage of data

The personal information you provide to us may be transferred and stored outside of the European Economic Area (“EEA”) for the purposes of things such as carrying out administration, the fulfilment of your order, the processing of your payment details and the provision of support services. Any personal information transferred will receive an adequate level of protection as required by the Data Protection laws. Third parties will only process your personal information on our instructions and in the agreement that the information is kept secure and confidential.

Any personal information transferred will receive an adequate level of protection as required by the Data Protection laws. Where any transfer is made to a country outside of the EEA and the European Commission has not made an adequacy decision in relation to the laws of that country we will ensure that appropriate safeguards are in place prior to any transfer of your data. Those safeguards are likely to consist of either the use of standard data protection clauses adopted or approved by the European Commission or transfer to a US based recipient which is a member of the EU-US Privacy Shield self-certification arrangement or an equivalent regime.

Data Subject Rights

Under certain circumstances, the law permits that you have the right to:

- **Access your information.**

You are entitled to request access to the information we hold about you (known as a 'data subject access request'). You are entitled to receive a copy of the personal information we hold about you and to check that it is being lawfully processed.

- **Correct your information.**

If the information we hold for you is incomplete or incorrect, you have the right to request a correction.

° **Request erasure.**

Where there are no reasons for continuing the processing of your personal information, you are able to request the removal or deletion of the personal information.

° **Object to processing.**

Where the firm relies on legitimate interest for the processing of your personal information, or for the purpose of direct marketing, you have the right to object to the processing.

° **Request the restriction of processing.**

You are entitled to request a suspension of the processing of your personal information, for example, if you are awaiting the reasons for the processing of the information or require us to establish its accuracy.

° **Transfer of your personal information.**

You are able to request the transfer of your personal information to another party.

It is important that the personal information we hold for you is accurate and up-to-date. If you would like to review, verify, correct or request erasure of your personal information, object to the processing of your personal data or request that we transfer a copy of your personal information to another party, please contact;

enquiries@jpc.co.uk

No fee

These rights are available to you at no cost; however we may charge a reasonable fee where a request is deemed to be excessive or unfounded. In such circumstances, we may otherwise refuse to comply with the request.

How long is your personal data retained?

Personal information that we process for any purposes will be kept for no longer than is necessary for the purposes for which it was collected.

It is not always possible to specify in advance the length of time your personal information will be retained. The retention of your personal data will be determined based on statutory authority, the nature of your relationship with the firm, the nature and sensitivity of the personal information, the purposes for which the information is being processed and whether there are other means to achieve those purposes.

Personal information may be retained for as long as necessary to comply with our legal obligation, or in order to protect yours or another person's vital interest.

Security

We understand the importance of protecting your privacy and we will ensure your data is safeguarded and held securely in accordance with our obligations under the Data Protection laws. Appropriate technical and organisational measures have been implemented to ensure personal information is protected and to prevent your personal data from being lost, used, accessed in an unauthorised way, altered or disclosed. Details of these measures are available upon request. We also limit access to your personal information to those employees, contractors and other third parties who have a business need to know. This access will be granted on a confidential basis and processing of the information will only take place subject to our instruction.

The firm have in place procedures and a policy to deal with any potential data security breaches, data subjects and any applicable regulators will be notified where we are legally required to do so.

Third party websites

Our website includes external links to other websites, which may be operated by AAT or third parties. Clicking on these links may allow the collection or sharing of personal data about you in ways which may differ from the terms set out here. We are not responsible for the privacy policies, contents or practices of third party websites, and encourage you to read the privacy policies of every external website you visit from our website.

Complaints

If you consider that our processing of your personal information infringes the Data Protection laws, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

How to contact us

By email at enquiries@jpc.co.uk or write to us at JPC Financial Ltd, 2nd Floor Lynton House, Station Approach, Woking, Surrey GU22 7PY.

Revision to our Privacy Policy

We reserve the right to revise this policy or any part of it from time to time and will provide you with a new policy notice where any substantial updates are made. We may also notify you through other means, about the processing of your information.

- Privacy Policy for Clients

JPC Financial Ltd (“We”, “us” or “our”) is committed to protecting and respecting your privacy.

This privacy notice sets out the basis for which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection laws, (the data controller is JPC Financial Ltd of 2nd Floor Lynton House, Station Approach, Woking, Surrey GU22 7PY (ICO Registration Number: Z8571704).

What information do we collect about you?

All client data will be held by us in our manual and automated filing systems. The data may include;

- contact details (including names, postal addresses, email addresses and telephone numbers);
- bank details;
- ID documents and other records

How is your personal information collected?

Your personal information may be collected directly from you during the process of setting you up as a client of ours or during the course of taking instructions from you or providing you with accounting or tax advice. We may also collect information from third parties including, background check agencies, credit reference agencies and other online sources.

Purpose - how will we use your personal information?

We will only use your information when it is fair and lawful to do so. Most commonly, we will use your personal information in the following circumstances:

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1. Where we need to perform the contract that we have entered into with you.
 2. Where we need to comply with a legal obligation;
 3. Where it is necessary for our legitimate interests (or those of a third party) namely to provide you with advice and assistance or in facilitating and enabling the management of all matters relating to our business, but only where your interests and fundamental rights do not override those interests.
 4. Where you have given your consent and that consent has not subsequently been withdrawn by you.

We may also use your personal information in the following circumstances, which are likely to be rare:

5. Where we need to protect your interests (or someone's interests).
6. Where it is needed in the public interest.

The situations where we will process your personal data are listed below:

- to fulfil our contract with you;
- to provide you with our services;
- making payments to and on your behalf;
- creating a client account for you;
- to prevent fraud and to satisfy our legal obligations under The Money Laundering Regulations 2017 and corresponding financial crime legislations;
- to provide you with information about our services;
- to invite you to events or seminars that may be of interest to you;
- to provide you with updates about accounting, taxes and other topics that may be of interest to you;
- for marketing and advertising purposes;
- the enforcement of legal claims including debt collection including via out-of-court procedures.

Failure to provide personal information

Failure to provide certain information when requested may result in us being unable to perform both our legal obligations and our contractual duties to you, such as making payments to and on your behalf.

Disclosure of data

We may share your personal information with third parties, where this is reasonably necessary, for the purposes set out in the policy. Third parties may include other accountants and advisers, third party service providers (including contractors and agents), regulatory bodies (such as the ICAEW), law enforcement agencies and any members of our staff, our ultimate holding company, as defined in section 1159 of the UK Companies Act 2006. We may also disclose your personal information with other third parties, for example in the context of

the possible sale or restructuring of the business.

Data may also be disclosed if we are under a duty to share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of business and other agreements from time to time; or to protect the rights, property or safety of JPC Financial Ltd, our clients or others. This includes exchanging information with other companies and organisations for the purpose of fraud protection and credit risk reduction.

Transfer and storage of data outside the EU

The personal information you provide to the firm will be transferred and stored outside of the EEA only for purposes of carrying out administration and other functions necessary to provide our accounting services to you. Any personal information transferred will receive an adequate level of protection as required by the Data Protection laws. Third parties will only process your personal information on our instructions and in the agreement that the information is kept secure and confidential.

Where any transfer is made to a third party supplier (for example to someone that we have outsourced an administrative function to or a provider of storage) outside of the EEA and the European Commission has not made an adequacy decision in relation to the laws of that country we will ensure that appropriate safeguards are in place prior to any transfer of your data. Those safeguards are likely to consist of either the use of standard data protection clauses adopted or approved by the European Commission or transfer to a US based recipient which is a member of the EU-US Privacy Shield self-certification arrangement or an equivalent regime.

Where any transfer is made to another accountant, adviser or expert outside of the EEA we will usually do this on the basis that the transfer is necessary for the performance of our contract with you.

Data Subject Rights

Under certain circumstances you have a right to:

° **Access your information.**

You are entitled to request access to the information we hold about you (known as a 'data subject access request'). You are entitled to receive a copy of the personal information we hold about you and to check that it is being lawfully processed.

° **Correct your information.**

If the information we hold for you is incomplete or incorrect, you have the right to request a correction.

° **Request erasure.**

Where there are no reasons for continuing the processing of your personal information, you are able to request the removal or deletion of the personal information.

° **Object to processing.**

Where the firm relies on legitimate interest for the processing of your personal information, or for the purpose of direct marketing, you have the right to object to the processing.

° **Request the restriction of processing.**

You are entitled to request for a suspension for the processing of your personal information, for example, if you are awaiting the reasons for the processing of the information or require us to establish its accuracy.

° **Transfer of your personal information.**

You are able to request the transfer of your personal information to another party.

It is important that the personal information we hold for you is accurate and up-to-date. If you would like to review, verify, correct or request erasure of your personal information, object to the processing of your personal data or request that we transfer a copy of your personal information to another party, please contact;

enquiries@jpc.co.uk

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No fee

These rights are available to you at no cost; however we may charge a reasonable fee where a request is deemed to be excessive or unfounded. In such circumstances, we may otherwise refuse to comply with the request.

How long is your personal data retained?

Our retention period is based on statutory authority and will be held for a minimum of six years, which may be extended dependant on the nature of your relationship with the firm. Personal information may be retained for as long as necessary to comply with our legal obligation, or in order to protect yours or another person's vital interest.

Security

We understand the importance of protecting your privacy and we will ensure your data is safeguarded and held securely in accordance with our obligations under the Data Protection laws. Appropriate technical and organisational measures have been implemented to ensure personal information is protected and to prevent your personal data from being lost, used, accessed in an unauthorised way, altered or disclosed. Details of these measures are available upon request. We also limit access to your personal information to those employees, contractors and other third parties who have a business need to know. This access will be granted on a confidential basis and processing of the information will only take place subject to our instruction.

The firm have in place procedures and a policy to deal with any potential data security breaches, data subjects and any applicable regulators will be notified where we are legally required to do so.

Complaints

If you consider that our processing of your personal information infringes the Data Protection laws, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

How to contact us

By email at enquiries@jpc.co.uk or write to us at FAO: Risk and Compliance Officer, JPC Financial Ltd, 2nd Floor Lynton House, Station Approach, Woking, Surrey GU22 7PY.

Revision to our Privacy Policy

We reserve the right to revise this policy or any part of it from time to time and will provide you with a new policy notice where any substantial updates are made. We may also notify you through other means, about the processing of your information.

- Privacy Policy for Clients

JPC Financial Ltd (“We”, “us” or “our”) is committed to protecting and respecting your privacy.

This privacy notice sets out the basis for which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection laws, (the data controller is JPC Financial Ltd of 2nd Floor Lynton House, Station Approach, Woking, Surrey GU22 7PY (ICO Registration Number: Z8571704).

What information do we collect about you?

As a contract of JPC Financial Ltd your data will be held by the firm in its manual and automated filing systems.

The data may include;

- contact details (including names, employment details, marital status, postal addresses, email addresses and telephone numbers)

How is your personal information collected?

Your personal information may be collected directly from you by you providing us with a business card or other similar source of information about yourself, through our registration process, feedback forms or by corresponding with us by phone, email or otherwise.

Purpose - how will we use your personal information?

We will only use your information when it is fair and lawful to do so. Most commonly, we will use your personal information in the following circumstances:

1. Where it is necessary for our legitimate interests (or those of a third party) namely providing you with updates and marketing materials and enabling the management of all matters relating to our business, but only where your interests and fundamental rights do not override those interests.
2. Where you have given your consent and that consent has not subsequently been withdrawn by you.

We may also use your personal information in the following circumstances, which are likely to be rare:

3. Where we need to protect your interests (or someone's interests).
4. Where it is needed in the public interest.

The situations where we will process your personal data are listed below:

- to provide you with information about our services;
- to provide you with updates about accounting, taxes and other topics that may be of interest to you;
- to invite you to events or seminars that may be of interest to you
- for marketing and advertising purposes.

Disclosure of data

We may share your personal information with third parties (including business partners, suppliers and sub-contractors), regulatory bodies (for example ICAEW) or any member of our staff and our ultimate holding company, as defined in section 1159 of the UK Companies Act 2006, where this is reasonably necessary, for the purposes set out in the policy.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or

assets.

° If JPC Financial Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its clients and contracts will be one of the transferred assets.

° If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of business and other agreements from time to time; or to protect the rights, property, or safety of JPC Financial Ltd, our clients or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Transfer and storage of data outside the EU

The personal information you provide to us may be transferred and stored outside of the European Economic Area (“EEA”) only for the purposes of things such as carrying out administration, the fulfilment of your order, the processing of your payment details and the provision of support services. Any personal information transferred will receive an adequate level of protection as required by the Data Protection laws. Third parties will only process your personal information on our instructions and in the agreement that the information is kept secure and confidential.

Any personal information transferred will receive an adequate level of protection as required by the Data Protection laws. Where any transfer is made to a country outside of the EEA and the European Commission has not made an adequacy decision in relation to the laws of that country we will ensure that appropriate safeguards are in place prior to any transfer of your data. Those safeguards are likely to consist of either the use of standard data protection clauses adopted or approved by the European Commission or transfer to a US based recipient which is a member of the EU-US Privacy Shield self-certification arrangement or an equivalent regime.

Data Subject Rights

Under certain circumstances you have a right to:

° **Access your information.**

You are entitled to request access to the information we hold about you (known as a 'data subject access request'). You are entitled to receive a copy of the personal information we hold about you and to check that it is being lawfully processed.

° **Correct your information.**

If the information we hold for you is incomplete or incorrect, you have the right to request a correction.

° **Request erasure.**

Where there are no reasons for continuing the processing of your personal information, you are able to request the removal or deletion of the personal information.

° **Object to processing.**

Where the firm relies on legitimate interest for the processing of your personal information, or for the purpose of direct marketing, you have the right to object to the processing.

° **Request the restriction of processing.**

You are entitled to request for a suspension for the processing of your personal information, for example, if you are awaiting the reasons for the processing of the information or require us to establish its accuracy..

° **Transfer of your personal information.**

You are able to request the transfer of your personal information to another party..

It is important that the personal information we hold for you is accurate and up-to-date. If you would like to review, verify, correct or request erasure of your personal information, object to the processing of your personal data or request that we transfer a copy of your personal information to another party, please contact;

enquiries@jpc.co.uk

No fee

These rights are available to you at no cost; however we may charge a reasonable fee where a request is deemed to be excessive or unfounded. In such circumstances, we may otherwise refuse to comply with the request.

How long is your personal data retained?

We will generally hold your personal data for a minimum of two years or for as long as is necessary for the purposes of which it was collected thereafter or whenever you tell us you no longer want to remain on our contact list. Personal information may be retained for as long as necessary to comply with our legal obligation, or in order to protect yours or another person's vital interest.

Security

We understand the importance of protecting your privacy and we will ensure your data is safeguarded and held securely in accordance with our obligations under the Data Protection laws. Appropriate technical and organisational measures have been implemented to ensure personal information is protected and to prevent your personal data from being lost, used, accessed in an unauthorised way, altered or disclosed. Details of these measures are available upon request. We also limit access to your personal information to those employees, contractors and other third parties who have a business need to know. This access will be granted on a confidential basis and processing of the information will only take place subject to our instruction.

The firm have in place procedures and a policy to deal with any potential data security breaches, data subjects and any applicable regulators will be notified where we are legally required to do so.

Complaints

If you consider that our processing of your personal information infringes the Data Protection laws, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

How to contact us

By email at enquiries@jpc.co.uk or write to us at Managing Director, JPC Financial Ltd, 2nd Floor Lynton House, Station Approach, Woking, Surrey GU22 7PY.

Revision to our Privacy Policy

We reserve the right to revise this policy or any part of it from time to time and will provide you with a new policy notice where any substantial updates are made. We may also notify you through other means, about the processing of your information.

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to enquiries@jpc.co.uk.

