

## Our Client Service, Your Privacy

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## 1. Introduction

Baxendale Employee Ownership respects your privacy and is committed to protecting your Personal Data. **Personal Data** means any data where you can be identified but will not include any data where the identity has been removed such as anonymous data.

This privacy notice tells you about:

- who we are, and how to get in contact with us;
- the Personal Data we collect and how we use it including: the data processing activities that are carried out by us in relation to any client service and the legal bases that we rely upon for these processing activities;
- how we look after your Personal Data, including any marketing activities; and
- your privacy rights and how the law protects you.

All Personal Data relating to our client services, whether collected or provided with, will only be held and stored in accordance with this privacy policy and the Data Protection Act 2018.

## 2. Important information about us and contact details

Baxendale Employee Ownership Limited will be the 'data controller' unless stated otherwise - a company incorporated and registered in England with registered number 12342054 and having its registered office at Runway East, 279 Tottenham Court Road, London, W1T 7RJ, England (**Baxendale Employee Ownership** or **we, us, our**).

When we act as data controller we are responsible for your Personal Data including how we hold and use your Personal data. We may update this privacy policy from time to time to ensure it is always up to date and accurate. Any changes we may make to this privacy policy will be posted on this website but we will communicate any significant changes to you.

We have appointed Ewan Hall as our Data Protection Officer (**DPO**). He is responsible for this notice and can deal with any questions you may have about it, or about your Personal Data. Please contact [ewan.hall@baxendale-eo.co.uk](mailto:ewan.hall@baxendale-eo.co.uk), or by post to our registered office, Baxendale Employee Ownership Runway East, 279 Tottenham Court Road, London, W1T 7RJ, England.

## 3. Personal Data we collect about you

We may collect, hold and/or use Personal Data, where applicable, about you, your family members, shareholders of the company, your colleagues or your instructing advisors (**you, your, they or their**). All such Personal Data may have been collected (i) in the past, under a previous enquiry or client relationship (ii) in the present, where we are currently working with you or (iii) through a third party.

Where you have provided Personal Data on behalf of somebody else, you will ensure that you (i) have provided a copy of this privacy policy to that individual and (ii) you have received all the necessary and/or appropriate consents from that individual prior to providing us with their Personal Data.

We may hold your Personal Data in a number of capacities for similar reasons so your Personal Data may fall into more than one category below.

|    | Data Category              | Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. | <b>Identity Data</b>       | being your or their name(s), title, job title, postal addresses, marriage details, tax details, directorships, shareholding details, employment details, unique customer codes, Companies House data including identity verification codes, financial position, payment information, social media information and further personal KYC information, including any photographic identification, such as date of birth, national insurance number, driving licenses or passport number but only when necessary such to comply with our anti-money laundering obligations. |
| 2. | <b>Contact Data</b>        | being information that allows us to contact you and the contact details of people associated with you such as your or their name, email addresses, postal addresses and telephone numbers.                                                                                                                                                                                                                                                                                                                                                                              |
| 3. | <b>Marketing Data</b>      | being your direct marketing preferences, responses to surveys, forms or questions, the use of our websites including what you want us to contact you about and how.                                                                                                                                                                                                                                                                                                                                                                                                     |
| 4. | <b>Correspondence Data</b> | being data that includes sharing comments and opinions with us, asking us questions, the exercise of any statutory rights under data protection law or making a complaint.                                                                                                                                                                                                                                                                                                                                                                                              |

Sometimes we will use Personal Data to put together statistics and research. For example, we might want to work out how many users are accessing a particular website feature. As this information will always be anonymised it will no longer be treated as Personal Data.

#### 4. Special Data

There are certain types of Personal Data called Special Category Data which is particularly sensitive

because it can be used to identify details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health.

We do not collect any Special Category Data about individuals unless we have been told this information specifically.

We may process information regarding criminal convictions and offences if we receive such information as part of our anti-money laundering checks. We will only keep it for as long as is necessary.

## **5. Changes to your Personal Data**

We want to make sure that any Personal Data that we hold is accurate and current. Please let us know if details change or require updating by contacting your relationship partner or emailing our DPO or [contact@baxendale-eo.co.uk](mailto:contact@baxendale-eo.co.uk).

## **6. How is your Personal Data collected?**

We use different methods and sources when collecting Personal Data about you, for example, when you:

- meet us;
- fill in forms/surveys, or when you correspond with us by post, phone, email, website or in some other format;
- provide information via our anti-money laundering software provider 'First AML';
- contact us about our services;
- contract with us in relation to our services;
- provide us your data;
- subscribe to our service or publications;
- request marketing to be sent to you;
- attend one of our courses or a course that we help to facilitate; or
- give us some feedback.

We may use third parties or publicly available sources for example Public Registers (such as Companies House), First AML (our anti-money laundering software provider), social media, third party advisers (including our partnerships), third party referrals or the Employee Ownership Association. Where we are given Personal Data to process by external organisations we may act as a data processor instead of a data controller as we are acting on somebody else's instructions.

## 7. Cookies

We use cookies on our website. Our [cookie policy](#) explains the cookies we use and why.

## 8. How we use your Personal Data and why

### 8.1 Legal Basis

We will only use your Personal Data when the law allows us to, which includes following a legal basis under the UK Data Protection Act. Usually, it will be in the below circumstances, each a legal basis:

- Where you have given us your express **consent**.
- Where we perform a **contract** that we are about to enter into or have entered into with you.
- Where we use Personal Data to run our business for our **legitimate interests** (or those of a third party). This includes using your Personal Data as part of our usual business activities, but only if it has been provided for that purpose, and interests and fundamental rights are not compromised.
- Where we need to comply with a **legal or regulatory obligation**. For example, our anti-money laundering obligations or where a Court or Government agency is allowed to request the data.

We have put together a table below which describes circumstances where we use your Personal Data and the legal reasons which may overlap.

| Purpose/Activity                                                                                                                                                                   | Personal Data Type                                                                                                             | Lawful Basis                                                                                                                                        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| Registering perspective client information and the provision of initial or introductory services                                                                                   | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Marketing</li> <li>• Correspondence</li> </ul>                    | <ul style="list-style-type: none"> <li>• Your Consent</li> <li>• Our Contract</li> <li>• Legal Obligation</li> <li>• Legitimate Interest</li> </ul> |
| Providing our service                                                                                                                                                              | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing</li> <li>• Correspondence</li> </ul> | <ul style="list-style-type: none"> <li>• Your Consent</li> <li>• Our Contract</li> <li>• Legal Obligation</li> <li>• Legitimate Interest</li> </ul> |
| After care services including notifying you of updates to our services or additional offerings, updates to our privacy policy or requesting feedback and reference recommendations | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing</li> <li>• Correspondence</li> </ul> | <ul style="list-style-type: none"> <li>• Your Consent</li> <li>• Our Contract</li> <li>• Legal Obligation</li> <li>• Legitimate Interest</li> </ul> |

|                                                                                                                                                  |                                                                                                                                |                                                                                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
| Marketing, research and providing/developing additional services and then considering the effectiveness of such content.                         | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing</li> </ul>                           | <ul style="list-style-type: none"> <li>• Your Consent</li> <li>• Legitimate Interest</li> </ul>     |
| Maintaining and improving our services including partner training and optimising our business processes/performance                              | <ul style="list-style-type: none"> <li>• Marketing</li> <li>• Correspondence</li> </ul>                                        | <ul style="list-style-type: none"> <li>• Legitimate Interest</li> </ul>                             |
| Answering questions and potential leads from our website or client referrals                                                                     | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing</li> </ul>                           | <ul style="list-style-type: none"> <li>• Your Consent</li> <li>• Legitimate Interest</li> </ul>     |
| Management information reporting and pricing, forecasting and modeling                                                                           | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Marketing</li> </ul>                                              | <ul style="list-style-type: none"> <li>• Our Contract</li> <li>• Legitimate Interest</li> </ul>     |
| Taking payment for our services and debt collection                                                                                              | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Correspondence</li> </ul>                      | <ul style="list-style-type: none"> <li>• Our Contract</li> </ul>                                    |
| Answering your questions and complaints                                                                                                          | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing</li> <li>• Correspondence</li> </ul> | <ul style="list-style-type: none"> <li>• Our Contract</li> </ul>                                    |
| Complying with data protection legislation including maintaining the accuracy and relevance of your data                                         | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing</li> <li>• Correspondence</li> </ul> | <ul style="list-style-type: none"> <li>• Legal Obligation</li> <li>• Legitimate Interest</li> </ul> |
| Complying with anti-money laundering compliance requirements, assisting with law enforcement agencies and other public authorities such as HMRC. | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing</li> <li>• Correspondence</li> </ul> | <ul style="list-style-type: none"> <li>• Legal Obligation</li> <li>• Legitimate Interest</li> </ul> |

## 8.2 Change of purpose

We will only use your Personal Data for the reason it was collected as per the above table, but if we do need to use your Personal Data for an unrelated purpose, we will notify you the lawful basis that allows us to do so.

## 8.3 Marketing from us

From time to time, we may use your Identity or Correspondence Data to form a view on what we

think you may want or need, or what may be of interest to you. Where you have not consented to receive direct marketing communications, we will only send these communications to you when permitted to do so by law, but in all circumstances, we will respect your specified marketing preferences.

#### 8.4 Third-party marketing

We do not share your Personal Data with anyone for marketing purposes. If we want to do this, we will ask you for your express consent.

#### 8.5 Opting out

You can ask us to stop sending you marketing messages at any time by emailing 'stop' to [contact@baxendale-eo.co.uk](mailto:contact@baxendale-eo.co.uk).

Where you opt out of receiving these marketing messages, this will not stop us using Personal Data or contacting you as part of delivering our services as we will be using the lawful bases set out in the above table.

### 9. Sharing your Personal Data

As noted above, we do not share your Personal Data with anyone for marketing purposes, but we will need to share it with certain organisations so that we can operate our usual business activities and provide our services.

Your Personal Data will be shared with our third parties where they need to provide us with a service. We will only provide third parties with the information they need to know to perform their specific services. Third parties may only process your Personal Data for specified purposes and in accordance with our instructions and never for their own purpose. Please note that the list below is subject to change and we will update it as soon as is reasonably practicable.

| Who                                                     | Example                                                                                                | Location                                                       |
|---------------------------------------------------------|--------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| Any party approved by you                               | <ul style="list-style-type: none"><li>Where you request us to work with your other advisers.</li></ul> | <ul style="list-style-type: none"><li>As required</li></ul>    |
| Industry partners and other companies that we work with | <ul style="list-style-type: none"><li>Employee Ownership Association</li><li>Accountants</li></ul>     | <ul style="list-style-type: none"><li>United Kingdom</li></ul> |

|                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Companies that help us run our business, support our IT infrastructure, store data, provide communication services and further understand our customers. | <ul style="list-style-type: none"> <li>• Projectworks</li> <li>• First AML</li> <li>• Adobe</li> <li>• Dropbox Inc</li> <li>• Microsoft Corporation</li> <li>• Mailchimp/ The Rocket Science Group</li> <li>• Precept IT</li> <li>• LinkedIn</li> <li>• Clean Digital</li> <li>• Capsule / Zestia Ltd</li> <li>• Xero</li> <li>• Zoom</li> </ul> | <ul style="list-style-type: none"> <li>• European Economic Area</li> <li>• United Kingdom</li> <li>• United States</li> <li>• Australia</li> <li>• New Zealand</li> </ul> |
| The Government, Regulators or law enforcement agencies or other public authorities                                                                       | <ul style="list-style-type: none"> <li>• Information Commissioner's Office (ICO)</li> <li>• His Majesty's Revenue &amp; Customs (HMRC)</li> </ul>                                                                                                                                                                                                | <ul style="list-style-type: none"> <li>• United Kingdom</li> </ul>                                                                                                        |

Where we are considering a potential sale or transfer or restructuring of our business, we may share Personal Data but in the first instance we will always anonymise where possible.

We may also need to disclose your Personal Data to comply with a regulatory or legal duty including any requests from a regulator (such as HMRC) or in connection with an investigation of suspected or actual fraudulent activity or is based on a lawful disclosure request.

## 10. International transfers

Some of your Personal Data may be transferred outside of the UK when our third parties are processing your Personal Data on our behalf such as the European Economic Area or the United States. We will ensure that all Personal Data is provided with adequate protection and that all transfers of Personal Data are done lawfully.

Where we transfer Personal Data to a country not determined as providing an adequate level of protection for Personal Data these transfers will be under an agreement with specific clauses to ensure any Personal Data is transferred with similar protections, for example, using the European Commission approved standard contractual clauses or the UK's international data transfer agreement or addendum.

## 11. Data security

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 12. Data retention

We will only keep your Personal Data for as long as necessary to fulfil the purposes we collected it for. We may need to keep it for longer to satisfy any legal, accounting, or reporting requirements.

## 13. Your legal rights

You have a number of important legal rights in relation to your Personal Data including the right to be informed about the Personal Data we collect; how we use your Personal Data; and from whom we collect your Personal Data when we obtain it from other sources.

Sometimes these rights will be limited and it may depend on the legal basis why we use and collect your Personal Data.

You are entitled to do the following:

- **Request access** to your Personal Data (known as a "data subject access request"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us to keep using it, or we have not been using it lawfully.
- **Object to processing** of your Personal Data. This enables you to object to us using your Personal Data where we have a legitimate interest (as set out in section 8.1) but you feel your rights override ours based on a particular situation you have explained to us.

- **Request a restriction on processing** of your Personal Data. This enables you to ask us to stop using your data, without necessarily deleting it, or to just put its use on hold while we establish why we need it.
- **Request the transfer** of your automated Personal Data to you or to a third party. If you consented to providing data by an automatic process, for example where it has been collected by some automated software, then you can ask for it to be provided to you or to a third party.
- **Request the reconsideration** of an automated decision. This enables you to ask us to reconsider a decision that was made solely by automated means or to ask for human intervention.
- **Withdraw consent at any time** where you have given us this consent in the first place to use the Personal Data for a specific reason. This may mean we will not be able to provide certain products or services to you.

## 14. How to exercise your rights

If you wish to exercise any of your rights or if you have any concerns about our use of your personal data, please contact our Data Protection Officer, Ewan Hall by email at [ewan.hall@baxendale-eo.co.uk](mailto:ewan.hall@baxendale-eo.co.uk), or by post to Baxendale, Runway East, 20 St Thomas Street, London SE1 9RS.

### 14.1 No fee usually required

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or if you ask for further copies of your information following a request. In these cases, we may be justified in refusing to comply with your request.

### 14.2 What we may need from you

We may need some information from you to help us confirm your identity and ensure you do have a valid right. This is a security measure to ensure that your data is not disclosed to anyone else who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### 14.3 Time limit to respond

We try to respond to all legitimate requests within a month, starting from the day of receipt. Occasionally it may take us longer than a month if your request is particularly complex or you have

made a number of requests. In this case, we will notify you and keep you updated and respond within three months, starting from the day of receipt.

#### **14.4 Information Commissioner**

If you have any concerns about our use of your Personal Data, as well as contacting our Data Protection Officer, you can also contact the Information Commissioner at <https://ico.org.uk/global/contact-us/>.