

# Privacy Policy

Protecting your personal details on our website

Last updated: 17 August 2013

Smile Accountants Limited knows that you care how information about you is used and shared and we appreciate your trust in us to do that carefully and sensibly. This notice describes our privacy policy. **By visiting [www.smilebookkeeping.com](http://www.smilebookkeeping.com) you are accepting and consenting to the practices described in this Privacy Policy.**

This website is brought to you by Smile Accountants Limited. Smile Accountants Limited believes it is important to protect your privacy and we are committed to giving you a personalised service that meets your needs in a way that also protects your privacy. This policy explains how we may collect information about you and then use it to meet your needs. It also explains some of the security measures we take to protect your privacy, and tells you certain things we will not do. You should read this policy in conjunction with the website terms and conditions.

When we first obtain personal information from you, or when you take a new service or product from us, we will give you the opportunity to tell us if you do or do not want to receive information from us about other services or products (as applicable). You can normally do this by ticking a box on an application form or contract. You may change your mind at any time by emailing us at the address below.

Some of the personal information we hold about you may be 'sensitive personal data' within the meaning of the Data Protection Act 1998, for example, information about your health or ethnic origin.

## 1. Collecting Information

We may collect personal information about you from a number of sources, including the following:

- From you when you agree to take a service or product from us, in which case this may include your contact details, date of birth, how you will pay for the product or service and your bank details
- From you when you contact us with an enquiry or in response to a communication from us, in which case, this may tell us something about how you use our services
- From documents that are available to the public, such as the electoral register

## 2. Using Your Personal Information

Information about our customers is an important part of our business and we are not in the business of selling it to others. We share customer information only as described below.

### 2.1. We will use your personal information to:

- Identify you when you contact us
- Help identify accounts, services and/or products which you could have from us or selected partners from time to time. We may do this by automatic means using a scoring system, which uses the information you have provided and/or any information we hold about you and information from third party agencies (including credit reference agencies).
- Help administer and contact you about improved administration of any accounts, services and products we have provided before, do provide now or will or may provide in the future
- Carry out marketing analysis and customer profiling (including with transactional information), conduct research, including creating statistical and testing information
- Help to prevent and detect fraud or loss
- Contact you in any way (including mail, email, telephone, visit, text or multimedia messages)

about products and services offered by us and selected partners unless you have previously asked us not to do so

- Keep you up to date with our member benefit scheme under which, as part of your membership benefits, we will give you membership information and details of discounts and offers we negotiate from time to time on behalf of our members. If you do not wish to receive this benefit, please write to our Data Protection Manager at the address given below.

- 2.2. We may allow other people and organisations to use information we hold about you as part of the process of selling one or more of our businesses, or if we have been legitimately asked to provide information for legal or regulatory purposes or as part of legal proceedings or prospective legal proceedings. From time to time, these other people and organisations may be outside the European Economic Area in countries that do not have the same standards of protection for personal data as the UK. So far as possible, the use by these other people and organisations of information about you will remain subject to the terms of this Privacy Policy.
- 2.3. We employ other companies and individuals to perform functions on our behalf. Examples include fulfilling orders, delivering packages, sending postal mail and email, removing repetitive information from customer lists, analysing data, providing marketing assistance, providing search results and links (including paid listings and links), processing credit card payments and providing customer service. They have access to personal information needed to perform their functions, but may not use it for other purposes. Further, they must process the personal information in accordance with this Privacy Policy and as permitted by the Data Protection Act.
- 2.4. We may monitor and record communications with you (including phone conversations and emails) for quality assurance and compliance.
- 2.5. We will check your details with fraud prevention agencies. If you provide false or inaccurate information and we suspect fraud, we will record this. We and other organisations may use and search these records to:
- help make decisions about credit and credit related services for you and members of your household;
  - help make decisions on motor, household, credit, life and other insurance proposals and insurance claims for you and other members of your household;
  - trace debtors, recover debt, prevent fraud and to manage your accounts or insurance policies;
  - check your identity to prevent money laundering, unless you give us other satisfactory proof of identity.
- 2.6. Where you give us information on behalf of someone else, you confirm that you have provided them with the information set out in this document and that they have not objected to such use of their personal information. Where you give us sensitive data about yourself or another person (such as health details or details of any criminal convictions), you agree (or confirm that the other person has agreed) to our processing such information in the manner set out in this document.
- 2.7. In connection with any transaction which we enter into with you, we, and other companies in our group, may carry out credit and fraud prevention checks with one or more licensed credit reference and fraud prevention agencies. We and they may keep a record of the search. Information held about you by these agencies may be linked to records relating to other people living at the same address with whom you are financially linked. These records will also be taken into account in credit and fraud prevention checks. Information from your application and payment details of your account will be recorded with one or more of these agencies and may be shared with other organisations to help make credit and insurance decisions about you and members of your household with whom you are financially linked and for debt collection and fraud prevention. This includes those who have moved house and who have missed payments.

If you provide false or inaccurate information to us and we suspect fraud, we will record this and may share it with other people and organisations. We, and other credit and insurance organisations, may also use technology to detect and prevent fraud.

If you need details of those credit agencies and fraud prevention agencies from which we obtain and

with which we record information about you, please write to our Data Protection Compliance Manager at Smile Accountants Limited, 1 Old Bank View, Oldham, OL1 4QF.

### 3. Protecting Information

We have strict security measures to protect personal information.

- We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input.
- We reveal only the last five digits of your credit card numbers when confirming an order. Of course, we transmit the entire credit card number to the appropriate credit card company during order processing.
- We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable customer information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.
- It is important for you to protect against unauthorised access to your password and to your computer. Be sure to sign off when you finish using a shared computer.

### 4. The Internet

- 4.1. If you communicate with us using the Internet, we may occasionally email you about our services and products. When you first give us personal information through our website, we will normally give you the opportunity to say whether you would prefer us not to contact you by email. However, you can always send us an email (at the address set out below) at any time if you change your mind.
- 4.2. Please remember that communications over the Internet, such as emails and webmails (messages sent through a website), are not secure unless they have been encrypted. Your communications may go through a number of countries before they are delivered - this is the nature of the Internet. We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.
- 4.3. We may use 'cookies' to monitor how people use our site. This helps us to understand how our customers and potential customers use our website so we can develop and improve the design, layout and function of the sites. A cookie is a piece of information that is stored on your computer's hard drive through your browser, to recognise your browser and which records how you have used a website. This means that when you go back to that website, it can give you tailored options based on the information it has stored about your last visit. You can normally alter the settings of your browser to prevent it from accepting cookies.
- 4.4. If you do not want us to use cookies in your browser, you can set your browser to reject cookies or to tell you when a website tries to put a cookie on your computer. However, you may not be able to use some of the products or services on our website without cookies.

### 5. Turning Off Cookies in Different Browsers

The Help menu on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. Additionally, you can disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-ons settings or visiting the website of its manufacturer.

### 6. Links

Our site may include third-party advertising and links to other websites. We do not provide any personally identifiable customer information to these advertisers or third-party websites.

These third-party websites and advertisers, or Internet advertising companies working on their behalf, sometimes use technology to send (or "serve") the advertisements that appear on our website directly to your

browser. They automatically receive your IP address when this happens. They may also use cookies, JavaScript, web beacons (also known as action tags or single-pixel gifs), and other technologies to measure the effectiveness of their ads and to personalise advertising content. We do not have access to or control over cookies or other features that they may use, and the information practices of these advertisers and third-party websites are not covered by this Privacy Policy. Please contact them directly for more information about their privacy practices. In addition, the Network Advertising Initiative offers useful information about Internet advertising companies (also called "ad networks" or "network advertisers"), including information about how to opt-out of their information collection.

## 7. Further Information

If you would like any more information or you have any comments about our privacy policy, please either write to us at Data Protection Compliance Manager, Smile Accountants Limited, 1 Old Bank View, Oldham, OL1 4QF. Or email us at [Info@smilebookkeeping.com](mailto:Info@smilebookkeeping.com). We may amend this policy from time to time, in which case, we will publish the amended version on our website, and you can ask us for a copy by writing to the above address or by emailing us at [Info@smilebookkeeping.com](mailto:Info@smilebookkeeping.com). This policy applies to personal information we hold about individuals. It does not apply to information we hold about companies and other organisations.