

KFS Group of Companies - Privacy policy

This Policy Covers all companies within the KFS Group:

KFS Accountants Limited
KFS Online Ltd
KFS (Holdings) Limited
Keeping Finances Simple Ltd

Part A: Terms of this website and how we protect your data

Part B: Privacy notice relating to clients and/or services offered and provided

Engaged clients should read the whole policy.

Part A: Terms of this website and how we will use and protect your data.

At the KFS Group of companies we are committed to protecting and respecting your privacy.

This Policy explains when and why we collect personal information about people who visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. By using our website, you're agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to privacy@kfs.accountants or by writing to KFS Accountants Limited, Elcot Park, Elcot Lane, Marlborough SN8 2BG. Alternatively, you can telephone 01635 224999

KFS Accountants Limited has an ICO Certificate Reference number: ZA013542

How do we collect information from you?

We obtain information about you when you use our website, for example, when you contact us about accountancy services.

What type of information is collected from you?

The personal information we collect might include your name, address, email address, IP address, and information regarding what pages are accessed and when.

How is your information used?

We may use your information to:

- send you communications which you have requested and that may be of interest such as changes in legislation, business advice and promotions of our services;
- carry out our obligations arising from any contracts entered into by you and us;
- seek your views or comments on the services we provide;
- notify you of changes to our services;

We are legally required to hold some types of information to fulfil our statutory obligations and we will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

Who has access to your information?

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Third party service providers working on our behalf: We may pass your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to send you mailings). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

Please be reassured that we will not release your information to third parties to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the

rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

Your choices

You have a choice about whether or not you wish to receive information from us. We do not use any information for direct marketing communications from us about the work we do, our clients and our products and services. The only communication you might receive is an email response or phone call to your online quotation request or a direct email in response to a general enquiry. We will never send you communication by post unless you have engaged as a client with us. We will not retain your information for more than 28 days unless you have signed up for a service with us or are still engaging in email correspondence with us. If you wish for your details to be deleted before the 28 days are up please [contact us](#).

How you can access and update your information

The accuracy of your information is important to us. If you change your email address, or any of the other information we hold is inaccurate or out of date, please [contact us](#).

You have the right to ask for a copy of the information the KFS Group of companies hold about you. We may charge you a fee to cover any costs incurred in providing you with details of the information we hold about you. If the request made is excessive or repetitive, we send you a fees notice, detailing the fees that will be charged. We will not send the information until you have received the fee.

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's treated securely. Any sensitive information is encrypted and protected with the following software – Encrypted with 128 bit keys on SSL. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never have 100% guaranteed security. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to enforce its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are

responsible for keeping this password confidential. We ask you not to share your password with anyone.

Profiling

We never use your personal information to create a profile of your interests and preferences for any internal or marketing purposes.

Use of 'cookies'

1. What are cookies?

Cookies are widely used tiny pieces of software (files) that are installed on a computer or mobile device when an individual visits a website.

Windows Explorer, which is one of the main internet browsers, will usually store these files in a folder called 'cookies' in 'documents and permissions' on computers running Microsoft Windows.

Cookies allow websites to recognise that a user on an individual computer has previously visited the site. The cookies save some information about that user for when they access the site again in the future.

By using and browsing the KFS Group websites, you consent to cookies being used in accordance with our policy. If you do not consent, you must turn off cookies or refrain from using the site.

Most browsers allow you to turn off cookies. To do this, look at the 'help' menu on your browser. Switching off cookies may restrict your use of the website and/or delay or affect the way in which it operates.

2. What type of cookies are there?

Broadly, there are 4 types of cookie:

Strictly necessary cookies. These are cookies that are essential to make a website work and enable features that users have specifically asked for. These types of cookies are commonly used with e-billing. Without use of cookies, these features of the website could not operate.

Performance cookies. These cookies collect anonymous information about users for the purpose of assessing the performance of a website. Common uses include well-known web analytics tools such as ‘Google Analytics’.

Functionality cookies. These are cookies that automatically remember choices that users have previously made in order to improve their experience next time they visit a website. For example, where users select their preferred settings and layout.

Targeting or Advertising cookies. These cookies are similar to performance cookies, in that they collect information about users’ behaviour. However, this information is used at individual user level to advertise products and services to users on the basis of the behavioural information collected.

3. What cookies do the KFS Group websites use?

The following cookies have been identified through a scan by Cybot on 21/05/2018

Cookie Used	Cookie Category	Type of cookie	Why do we use this cookie
PHP Session			
PHPSESSID Expiration: Session	Strictly Necessary	Session	Preserve user session state across page requests
Allowed Cookies			
gdpr[allowed_cookies] Expiration: 1 year	Strictly Necessary	HTTP	Remembers the user’s selection for allowed cookies
Consent Types			
gdpr[consent_types] Expiration: 1 year	Strictly Necessary	HTTP	Remembers the user’s consent to types of cookie
reCAPTCHA			
mc_session_ids[default], mc_session_ids[multi] [0],	Strictly Necessary	HTTP	Remembers authentication of the user

mc_session_ids[multi] [1], mc_session_ids[multi][2], mc_session_ids[multi] [3], mc_session_ids[multi] [4] Expiration: Session			as a 'human' to prevent spam
Language			
Lang Expiration: Session	Preferences	Session	Remembers the user's selected language version of a website

Consent

By using our site, you can opt in to any cookie apart from strictly necessary, which must be active for the site to function correctly.

You may change your settings on our websites

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to the KFS Group websites, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third party site.

16 or under

We protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission before providing us with personal information.

Transferring your information outside of Europe

As part of the services offered to you through this website, the information which you provide to us is never transferred to countries outside the European Union ("EU"). If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

Review of this policy

We keep this Policy under regular review. This Policy was last updated in May 2018.

Part B: Privacy notice relating to clients and/or services offered and provided

KFS Group of companies takes the protection of your privacy very seriously. We will only use your personal information to deliver the services you have requested from us, and to meet our legal responsibilities.

How do we collect information from you?

We obtain information about you when you engage us to deliver our products and / or services and/or when you use our website, for example, when you contact us about our products and / or services.

What type of information do we collect from you?

The personal information we collect from you will vary depending on which products and / or services you engage us to deliver. The personal information we collect might include your name, address, telephone number, email address, your Unique Tax Reference (UTR) number, your National Insurance number, bank account details, your IP address, which pages you may have visited on our website and when you accessed them.

How is your information used?

In general terms, and depending on which products and / or services you engage us to deliver, as part of providing our agreed services we may use your information to:

- contact you by post, email or telephone;
- verify your identity where required;
- understand your needs and how they may be met;
- maintain our records in accordance with applicable legal and regulatory obligations;
- process financial transactions;
- prevent and detect crime, fraud or corruption;

We are required by legislation, other regulatory requirements and our insurers to retain your data where while we act on your behalf and provide you with engaged services. The period of data retention is no more than 7 years. If we have ceased to act for you we will

issue you a disengagement policy to ensure you understand that your data will be destroyed. This is all hard copy documents, electronic documents and any personal data relating to you or your business on our internal systems is permanently deleted. To ensure correct compliance of data protection, it is the policy of the firm to not retain data for a period in excess of six months from the date we cease to act or that we have been disengaged.

Who has access to your information?

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Any staff with access to your information have a duty of confidentiality under the ethical standards that this firm is required to follow.

Third party service providers working on our behalf

We may pass your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing products and / or services to you on our behalf, for example to deliver other specialist services accessible only via another KFS Group business or approved partner. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

We have put in place measures, based upon model contract clauses supplied by the European commission to ensure your personal data is treated by those third parties consistently and in a way which respects the data protection legislation. Should you require further information about these protective measures, please contact us using the contact details below.

Please be assured that we will not release your information to third parties unless you have either requested that we do so or it is required to complete a task requested by you, or we are required to do so by law, for example, by a court order or for the purposes of prevention and detection of crime, fraud or corruption.

Payment information

KFS Group uses third party payment processors GoCardless and to process payments made for products and services for engaged services. Your bank details are keyed into an automated online form generated by Gocardless. KFS Group never see this fully completed form. For security we only have sight from within our secure Gocardless dashboard of the name of the company, the name of the bank the payment is being taken from and the last two digits of the bank account number. If you need to update your payment method, simply cancel your direct debit mandate via your bank and we will issue you a new mandate directly via Gocardless to your designated email address. You can access Gocardless GDPR information [here](#).

How you can access and update your information

Keeping your information up to date and accurate is important to us. We commit to regularly reviewing and correcting where necessary, the information that we hold about you. If any of your information changes, please email us, or write to us, or call us using the 'Contact information' noted below.

You have the right to ask for a copy of the information that offices within the KFS Group of companies hold about you.

Security precautions in place to protect the loss, misuse or alteration of your information

Whilst we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given, or where you have chosen, a password which enables you to access information, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Your data will usually be processed in our offices in the UK. However, to allow us to operate efficient digital processes, we sometimes need to store information in servers located outside the UK. We take the security of your data seriously and so all of our systems have appropriate security in place that complies with all applicable legislative and regulatory requirements.

Your choices

We may occasionally contact you by post, email, telephone or other online methods of communication with details of any changes in legal and regulatory requirements or other

developments that may be relevant to your affairs and, where applicable, how we may assist you further. If you do not wish to receive such information from us, please let us know by contacting us as indicated under 'Contact information' below.

Your rights

Access to your information: You have the right to request a copy of the personal information about you that we hold.

Correcting your information: We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

Deletion of your information: You have the right to ask us to delete personal information about you where:

- you consider that we no longer require the information for the purposes for which it was obtained
- you have validly objected to our use of your personal information – see 'Objecting to how we may use your information' below
- our use of your personal information is contrary to law or our other legal obligations
- we are using your information with your consent and you have withdrawn your consent – see 'withdrawing consent to use your information' below.

Restricting how we may use your information: In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where there is no longer a basis for using your personal information but you do not want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Objecting to how we may use your information: Where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

Withdrawing consent to use your information: Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

Please contact us in any of the ways set out in 'Contact information' below if you wish to exercise any of these rights.

Changes to our privacy notice

We keep this privacy notice under regular review and update it here from time to time.

This privacy notice was last updated on 21 May 2018.

Contact information

In the first instance, please contact KFS (Holdings) Limited, who will pass you or your query to the relevant firm within the group:

KFS (Holdings) Limited
Elcot Park
Elcot Mews, Elcot Lane
Marlborough SN8 2BG
Telephone – 01672 624999
E-mail – headoffice@kfs.accountants

Complaints

We seek to resolve directly all complaints about how we handle your personal information but you also have the right to lodge a complaint with the Information Commissioner's Office at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Opting out

If you have any concerns regarding the data held about you by the KFS Group of Companies, please [contact us](#).

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