### **Privacy Statement**

### of OMG Chartered Certified Accountants

111a, George Lane, London, E18 1AN

This statement describes how we collect and use personal data about you, in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act [1998 OR 2018] and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK ('Data Protection Legislation').

This privacy statement explains what information we collect from you or you provide to us, how we use it and with whom we share that information. The privacy statement also sets out your rights and who you can contact for more information.

Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it. We are committed to protecting and respecting your privacy and handling your information in an open and transparent manner. These policies are subject to periodic review and any changes will be included within this section of the site.

#### **Data controller**

For the purpose of the Data Protection Legislation and this notice, we are the 'data controller'. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy statement.

We have appointed a Data Protection Officer. Our Data Protection Officer is our Data Protection Point of Contact and is responsible for assisting with enquiries in relation to this privacy statement or our treatment of your personal data. Should you wish to contact our Data Protection Point of Contact you can do so using the following contact details: panny@omg.uk.com.

### The way we may collect your personal data

We obtain personal data about you, for example, when:

you request a proposal from us in respect of the services we provide;

you or your employer or our clients engages us to provide our services and also during the provision of those services;

in having meetings and discussions in person, written correspondence, you contact us by email, fax, telephone, post [or social media] (for example when you have a query about our services); or

from third parties and/or publicly available resources (for example, from your employer or from Companies House).

We may need to collect data on our suppliers or prospective suppliers with whom we have or are looking to enter into a commercial agreement for provision of services. This may include our consultants, agencies, contractors and subcontractors.

### The type of information we may hold about you

The information we hold about you may include the following:

your personal details (such as your name and/or address);

details of contact we have had with you in relation to the provision, or the proposed provision, of our services;

details of any services you have received from us;

our correspondence and communications with you;

information about any complaints and enquiries you make to us:

information from research, surveys, and marketing activities;

Information we receive from other sources, such as publicly available information, information provided by your employer or our clients.

Forms of identification we may request could include: driving licence, birth certificate, passport, utility bill (from the last 3 months), bank statement (from the last 3 months).

### How we may use personal data we hold about you

We may process your personal data for purposes necessary for the performance of our contract with you or your employer or our clients and to comply with our legal obligations.

We may process your personal data for the purposes necessary for the performance of our contract with our clients. This may include processing your personal data where you are an employee, subcontractor, supplier or customer of our client.

We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.

We may process your personal data for certain additional purposes with your consent and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

We may use your personal data as part of our legitimate interest to provide you with up to date information on the services we offer.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

### Circumstances in which we will use your personal data

We will use your personal data in order to:

carry out our obligations arising from any agreements entered into between you or your employer or our clients and us (which will most usually be for the provision of our services);

carry out our obligations arising from any agreements entered into between our clients and us (which will most usually be for the provision of our services) where you may be a subcontractor, supplier or customer of our client:

provide you with information related to our services and our events and activities that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes;

seek your thoughts and opinions on the services we provide; and notify you about any changes to our services.

If you refuse to provide us with certain information when requested, we may not be able to perform

the contract we have entered into with you. Alternatively, we may be unable to comply with our legal or regulatory obligations.

We may also process your personal data without your knowledge or consent, in accordance with this statement, where we are legally required or permitted to do so.

# **Sensitive Personal Data**

When you apply for one of our jobs, you will need to register with us and submit an application. Data Protection Legislation gives special protection to certain types of sensitive information (which includes 'sensitive' or 'special categories' of personal data as defined by Data Protection Legislation). Special categories of personal data can include data about your race or ethnic origin; political opinions; religious or other similar beliefs; trade union membership; physical or mental health; sexual life or criminal record. You should only provide this information if it is required in response to a mandatory

question on our registration form, or if you are otherwise content for us to process this information in accordance with the terms of this privacy statement. Where you do provide sensitive information this will be accepted as your explicit consent to use that information in connection with the purpose for which it has been provided.

### Retention of data

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration:

the requirements of our business and the services provided;

any statutory or legal obligations;

the purposes for which we originally collected the personal data;

the lawful grounds on which we based our processing;

the types of personal data we have collected;

the amount and categories of your personal data; and

whether the purpose of the processing could reasonably be fulfilled by other means.

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

### **Sharing of data**

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.

"Third parties" includes third-party service providers. The following activities are carried out by third-party service providers: IT [and cloud] services, professional advisory services, administration services, marketing services and banking services.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with the law.

### Transfer of personal data outside the European Economic Area (EEA)

We will not transfer the personal data we collect about you outside of the EEA unless you provide specific consent.

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, 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.

### Protecting and storing your information

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

We take your online security seriously and have implemented generally accepted standards of technology and operational security to protect your personal information from loss, misuse, alteration or destruction. Once we have received your information we will ensure that the collection and use of it is in accordance with Data Protection Legislation. All of our employees are required to keep personal information confidential and only authorised persons have access to such information.

Please note, however, that the transmission of information via the Internet is not completely secure and we cannot guarantee the security of your personal information transmitted to us or provided though the site.

Data that you submit via our website is sent to and stored on secure servers owned by or operated for us.

# Your right to access, correct, erase and restrict

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by emailing our data protection point of contact: panny@omg.uk.com.

Under certain circumstances, by law you have the right to:

Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.

Request correction of the personal data that we hold about you.

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 continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

# Your right to withdraw consent (opting out)

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time.

You have the option of "unsubscribing" from our mailing list for newsletters, alerts and updates at any time, thereby disabling any further such e-mail or other form of communication from being sent to you. To withdraw your consent, please email our data protection point of contact at: panny@omg.uk.com. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### Your right to complain

If you have any concerns or questions about the security of our site, this privacy statement or any personal information we collect from you, please do not hesitate to contact our data protection point of contact at panny@omg.uk.com.

Additionally, if you have any concerns about the use of your information, you also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time.

The ICO's contact details are as follows:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Telephone - 0303 123 1113 (local rate) or 01625 545 745

Website - https://ico.org.uk/concerns

#### **Cookies Statement**

#### What are Cookies?

We collect information about your use of our Site through cookies. Cookies are information that files stored on your computer, tablet or smartphone that help websites remember who you are and information about your visit. Cookies can help to display the information on our Site in a way that matches your interests. Most major websites use cookies.

#### What cookies are used on this Site?

The cookies we and our business partners use on our Site are broadly grouped into the following categories:

- Essential Some of the cookies on our Site are essential for us to be able to provide you with a service you have requested. An example of this could be a cookie used to enable you to log into your account on our Site or which allows communication between your browser and our Site. Our cookie preference cookie described in the section "How can I reject or opt out of receiving cookies?" is also an essential cookie. You may not be able to use our Site without these cookies.
- Analytics We use analytics cookies to helps us understand how users engage with our Site. An example is counting the number of different people coming to our Site or using a particular feature, rather than the total number of times the site or feature is used. Without this cookie, if you visited our Site once each week for three weeks we would count you as three separate users. We would find it difficult to analyse how well our Site was performing and improve it without these cookies.
- User Cookies We use cookies to improve your experience by remembering your preferences so we know how you like to use our Site. Examples of this would be remembering you so that you are served with the same content or to remember you when you come back to our Site.
- **Social Sharing** We use third party cookies to allow you to share content directly on the social networking/sharing sites like Facebook, Twitter or Google+. Examples would be if you wanted to "like" or "tweet" about us or our products or services. Please see our "Third Party Cookies" section below for more details.
- Interest-Based Advertising You will have noticed that when you visit websites you will be shown adverts for products and services you may wish to buy. The money made by website owners for showing third party adverts on their websites often pays for the cost of running the website and therefore usually allows you to use the website without having to pay a registration or usage fee. To try and ensure that the adverts you see are relevant to you third party cookies may be used to collect information about the types of things that interest you, for example websites you visit and the geography that you are based in. Having these cookies does not increase the number of adverts you will be shown, but simply makes the adverts you see more relevant. Please see our "Third Party Cookies" section below for more details.

# How can I reject or opt out of receiving cookies?

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may be unable to access certain parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you use our Site. The "Help" menu of the toolbar on 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, or how to disable cookies altogether. For more information about

cookies and how to stop cookies being installed or how to delete existing cookies from your hard drive visit the following website: <a href="http://www.allaboutcookies.org">http://www.allaboutcookies.org</a>.

# Third party cookies

Some of the cookies described in the "What Cookies are used on our Site" section above are stored on your machine by third parties when you use our Site. Third parties may also read cookies on your browser to collect information or to serve content or advertisements to you. We have no control over these cookies or how the third parties use them. They are used to allow that third party to provide a service to us, for example analytics. For more information on these cookies and how to disable them, please see:

- Internet Advertising Bureau website at <a href="http://www.youronlinechoices.com/">http://www.youronlinechoices.com/</a> where you will be able to opt-out of receiving Interest-Based Advertising cookies from some of the third parties listed below; and/or
- If you want to know more about how cookies work and how to manage or delete them, visit the World Wide Web Consortium's website.