



# PRIVACY POLICY

## Introduction

At Warrens GBC Ltd, we take your privacy seriously. We are committed to ensuring that your personal data is protected in accordance with data protection laws and used in line with your expectations.

This privacy notice explains what personal data we collect, why we collect it, how we use it, the control you have over your personal data and the procedures we have in place to protect it.

When we refer to “we”, “us” or “our”, we mean Warrens GBC Ltd. The data protection team at Warrens GBC Ltd can be contacted at [dataprotection@warrensgbc.co.uk](mailto:dataprotection@warrensgbc.co.uk).

The full legal information for each entity, each a data controller, is:

Warrens GBC Ltd, a company registered in England and Wales (number 06074062) with its registered office address at 33 Thorne Road, Doncaster, DN1 2HD.

Professional Fee Protection (PFP) is also referred to in this notice because Warrens GBC Ltd uses PFP as a preferred insurance provider. PFP is a company incorporated in England and Wales (number 2339826) with its registered office at 5 Sylvan Court, Basildon, Essex, SS15 6TH.

Mercia Group Ltd (number 1464141) is referred to in this notice as they manage our web-site and its contents. They are based at 5th Floor, 10 Whitechapel High Street, London, E1 8QS

## What personal data we collect

We collect personal data about you to register you as a client of Warrens GBC Ltd and to provide a professional fee protection package (if applicable). Personal details that we obtain from you includes your name, date of birth, email address, address, telephone number, mobile number, employment details and financial information to produce financial accounts for you. The data will be collected from you directly, at an initial meeting, by phone and in paper or electronic form.

We may collect the other data from you when you voluntarily contact us. Additionally, data may also be required to process an insurance claim, such as payment information.

## Why we collect personal data and the legal basis for handling data

We use your personal data for the creation of your financial accounts, administration of PAYE schemes (where applicable) and insurance policy and premiums (if applicable), to fulfil the contractual membership and insurance services you have subscribed to. This includes using your data in the following ways:

- to maintain relevant contact with you about your accounts including keeping you updated about information which forms part of your remuneration package;
- to notify you of changes to the tax thresholds and other budgeting changes;
- to communicate with you for any other reason related to your accounts or personal tax affairs;

- to carry out our obligations under any other contract entered into between you and us including any audits, book-keeping or training or any other information, products or services requested from us;
- to correspond with you in order to process your accounts and deal with your tax affairs;
- to enable us to respond to any questions you ask;

With your consent, we would also like to use your personal data to send marketing information, to keep you up to date with tax matters and provide you with information, products and services, such as partners offers, which we feel may interest you. We will only use your data in this way if you confirm that you are happy for us to do so. You can unsubscribe from receiving such communications at any time by contacting us at mail@warrensgbc.co.uk or on 01302 340011.

### Who we share data with

We work with carefully selected partners who we trust to carry out work on our behalf. This involves us sharing your data with the following categories of recipients:

- HMRC;
- banking services to process payments;
- a financial advisor (where applicable);
- a legal advisory service provider (where applicable);
- a credit facility provider (only where applicable);
- PFP our insurance provider (only where applicable); and

We also share your data if:

- we are legally required to do so, for example, by a law enforcement agency or court;
- to enforce or apply the terms and conditions of your membership and/or insurance
- it is necessary to protect our rights, property or safety or to protect the rights, property or safety of others; and
- we sell or buy any other organisation or part of it (including us), in which case we may disclose your personal data to the prospective seller or buyer so that they may continue using it in the same way.

We will never share your data with any organisation to use for their own purposes.

### How do we protect data?

We take the security of your personal data seriously. We have internal policies and strict controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed and to prevent unauthorised access. Any payment transactions will be encrypted.

We will only pass your personal data to a third-party partner if they have signed a contract that requires them to:

- comply with the requirements of data protection laws;
- only use the data for the purpose(s) for which it was supplied;
- comply with a duty of confidentiality; and
- implement appropriate technical and organisational measures to ensure the security of your data.

### Where do we store your data?

All data you provide to us is stored on secure servers located in the UK. We also store data in paper files.

Our third-party partners will also store your data on secure servers which may be situated inside or outside the European Economic Area. They may also store data in paper files.

## How long do we retain your data?

We retain your data for as long as you wish to be a client and your paper files for a period of seven years after your financial year end in order to deal with any necessary follow-up action. Electronic data is retained indefinitely.

If you purchase an insurance package, we retain your data in connection with your insurance policy for up to six years following the termination or expiration of your insurance policy which is the period in line with the limitation on legal claims. In some cases, this period may be longer, only if it is necessary to comply with legal requirements for example under the Financial Conduct Authority, Delegated Authority Scheme Agreement and Health and Safety Regulations.

## Your rights with respect to your data

As a data subject, you have a number of rights. You can:

- Request to access, amend or correct the personal data we hold about you;
- Request that we delete or stop processing your personal data, for example where the data is no longer necessary for the purposes of processing; and
- Request that we transfer your personal data to another person.

If you wish to exercise any of these rights at any time, please contact our client relationship team at [dataprotection@warrensgbc.co.uk](mailto:dataprotection@warrensgbc.co.uk) or on 01302 340011.

If you would like to request the personal data that we hold about you, we will respond within one month and no processing fee will be payable.

## Automated decision making

Your personal data may be used by Mercia to facilitate an automated email programme, should you choose to subscribe. The automation will reference membership type, length of membership subscription, subscription expiry and consent for receipt of marketing communications to automate ongoing renewal notices and, where appropriate, information about additional services that you might find beneficial.

## How to ask questions about this notice

If you have any questions, comments or concerns about any aspect of this notice or how we handle your data please contact our client relationship team on 01302 340011 or at [dataprotection@warrensgbc.co.uk](mailto:dataprotection@warrensgbc.co.uk)

## Complaints

If our client relationship team have not been able to address your concern, please raise a complaint with our compliance team at [compliance@warrensgbc.co.uk](mailto:compliance@warrensgbc.co.uk) or on 01302 340011.

If you are concerned about the way your data is handled and remain dissatisfied after raising your concern with our compliance team, you have the right to complain to the Information Commissioner Office (ICO). The ICO can be contacted at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or <https://ico.org.uk/>.

## Changes to this notice

We keep this notice under regular review. Any changes to this notice will be posted at <https://www.warrensgbc.co.uk> and where appropriate, notified to you by email or in the post, so that you may be aware of how we use your data at all times.

## Further privacy information

For details of our full data protection policy please visit [www.warrensgbc.co.uk](http://www.warrensgbc.co.uk).