

Aber Wills Ltd

PRIVACY POLICY

This policy document explains when and why we collect personal information about you; how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We are Aber Wills Limited. Our registered office and correspondence address is Unit 4, Ffordd yr Onnen, Lon Parcwr Business Park, Ruthin, Denbighshire, LL15 1NJ.

We are obliged to collect, process and store some data as part of what we do.

In data protection language, we are known as the Data Controller of the personal information you provide to us.

Our Data Protection Officer (DPO) is Mrs Gill Jones. Mrs Jones can be contacted by email – gill@aberwills.co.uk

What Information We Need from You

The exact information we will request from you will depend on what you have asked us to do or what we are contracted to do for you.

The type of personal data (personal information) that you may provide to us is the general information that you supply about yourself or others – such as your name, address, gender, date of birth, contact details, financial information etc. In our normal anticipated course of dealings with our clients, personal data will be restricted to basic information.

However, it is technically possible, that we may be required to ask for more sensitive information.

What is the Source of the Information?

Information about you may be obtained from a number of sources, including:

- You may volunteer the information about yourself

- You may provide information relating to someone else – if you have the authority to do so

Why Do We Need Your Information?

The primary reason for asking you to provide us with your personal data, is to allow us to carry out your requests and undertake work for you.

The following are some examples, although not exhaustive, of what we may use your information for:

- Verifying your identity
- Communicating with you
- Providing our services to you
- Keeping financial records

Who has access to your Information?

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

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

Generally, we will only use your information within our own company. However, there may be circumstances, when undertaking work for you or for other good reason, where we are obliged to disclose personal information to third parties; for example:

- Our Accountants/Auditors;
- Any disclosure required by law or regulation; such as the prevention of financial crime and terrorism
- If there is an emergency and we think you or others are at risk

In the event any of your information is shared with any third parties, they are obliged to comply with our instructions and they should not use your personal information for their own purposes, unless you have explicitly consented to them doing so.

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There may potentially be some uses of personal data that may require your specific consent. If this is ever the case, we would contact you separately to ask for your consent which you would be free to withdraw at any time.

How do we Protect Your Personal Information?

We take all reasonable measures to protect your personal data whilst it is in our care.

We have high standards of technology in order to protect personally identifiable data from loss, misuse, alteration or destruction.

Similarly, we adopt a high standard when it comes to confidentiality obligations both internally and when dealing with third parties. We expect those third parties to conduct themselves similarly, to protect confidentiality of all information and to ensure all personal data is handled and processed confidentially and in compliance with data protection requirements.

How Long Will We Retain Your Personal Information?

Your personal information will be retained, usually in computer or manual files, only for as long as necessary to fulfil the purposes for which the information was collected; or as required by law.

What are Your Rights?

Under GDPR, you are entitled to access your personal data (otherwise known as a 'right to access'). If you wish to make a request, please do so in writing addressed to our Data Protection Officer Mrs Gill Jones.

A request for access to your personal data means you are entitled to a copy of the data we hold on you (such as your name, address, contact details, date of birth, information regarding your health and family circumstances) and the documents that contain this data.

Under certain circumstances, in addition to the entitlement to 'access your data', you have the following rights:

1. The right to be informed: which is fulfilled by way of this privacy document and our transparent explanation as to how we use your personal data

2. The right to rectification: you are entitled to have personal data rectified if it is inaccurate or incomplete

3. The right to erasure / 'right to be forgotten': you have the right to request the deletion or removal of your personal data where there is no compelling reason for its continued processing. This right only applies in the following specific circumstances:

- Where the personal data is no longer necessary regarding the purpose for which it was originally collected
- Where consent is relied upon as the lawful basis for holding your data and you withdraw your consent
- Where you object to the processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed
- Where you object to the processing for direct marketing purposes

4. The right to object: you have the right to object to processing based on legitimate interests; and direct marketing. This right only applies in the following circumstances:

- An objection to stop processing personal data for direct marketing purposes is absolute – there are no exemptions or grounds to refuse – we must stop processing in this context
- You must have an objection on grounds relating to your particular situation
- We must stop processing your personal data unless:
 - We can demonstrate compelling legitimate grounds

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for the processing which override your interests, rights and freedoms; or

- There is a legal or overriding statutory obligation to continue to do so.

5. The right to restrict processing: you have the right to request the restriction or suppression of your data. When processing is restricted, we can store the data but not use it. This right only applies in the following circumstances:

- Where you contest the accuracy of the personal data – we should restrict the processing until we have verified the accuracy of that data
- Where you object to the processing (where it was necessary for the performance of a public interest or purpose of legitimate interests), and we are considering whether our organisation's legitimate grounds override your right
- Where processing is unlawful and you request restriction (We would not knowingly process data unlawfully).

Complaints

If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Officer who will investigate further.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner's Office (ICO), with whom we are registered.

Marketing Data/ Direct Marketing

We may contact you for the purpose of direct marketing.

How Do We Collect Personal Data?

Normally, we collect personal data directly from you.

For What Purpose Do We Use Your Information?

Normally, we may use your personal information for the following reason:

- To enable us to carry out the work you have asked us to undertake on your behalf

Your Right to Object

We only ever use your personal information for the reasons indicated above. However, you have the right to object to processing. Should you wish to do so please email our DPO.