

# Online Privacy Notice

## Introduction

This online privacy notice is adopted by The Antony J. Holdsworth Company Ltd t/a Antony J. Holdsworth & Co and its subsidiaries Clarence Trustees LLP and Estuary House Tax LLP t/a E. H. Taylors, collectively referred to in this notice as the Group.

The Group is committed to respecting our customers' privacy and protecting their personal information from misuse or authorised disclosure and complying with privacy laws. The Group values its reputation and aims to maintain high ethical standards in the conduct of our business affairs.

This privacy policy explains how we use any personal information we collect about you when you use this website.

## Business Summary

The Group is a Professional Services company, specialising in the business area of Accountancy, Tax Planning, Wealth Management and Estate Planning.

We process personal information to enable us to maintain our own accounts and records, to support and manage our employees, and to provide our services as follows:

- Bookkeeping
- VAT filing
- Management accounts
- Periodic accounts reviews
- Preparation and filing of annual accounts
- Preparation and filing of annual tax returns
- Company secretarial services
- Payroll processing
- Company pension processing
- Profit improvement consultancy
- Personal and business tax planning
- Business start-up advice
- Business disposals
- Business retirement strategies
- Will writing
- Lasting powers of attorney
- Estate and IHT planning
- Probate Work
- Care fee mitigation advice

## Organisation Details

Organisation Size: THE GROUP employs between 10 and 15 staff.  
Business Location: Essex, UK

## Data Controller Details

Email Address: [bjw@antonyjholdsworth.co.uk](mailto:bjw@antonyjholdsworth.co.uk)  
Telephone Number: 01702 333337  
Postal Address: Estuary House  
37 Clarence Street  
Southend on Sea  
Essex  
United Kingdom  
SS1 1BH

## Data Protection Officer Details

Name: Beverley Wadhams  
Email Address: [bjw@antonyjholdsworth.co.uk](mailto:bjw@antonyjholdsworth.co.uk)  
Telephone Number: 01702 333337

## Data We Collect - Online Services

This Privacy Policy relates to our use of any personal information we collect from you via the following online services:

Any of our websites: [www.antonyjholdsworth.co.uk](http://www.antonyjholdsworth.co.uk)  
[www.clarence-trustees.co.uk](http://www.clarence-trustees.co.uk)  
[www.eh-taylors.co.uk](http://www.eh-taylors.co.uk)

Our social media accounts: Facebook @ehtaylors  
Twitter @ehtaylors  
<https://www.linkedin.com/company/clarence-trustees-llp>

Email you may send to us: [mail@antonyjholdsworth.co.uk](mailto:mail@antonyjholdsworth.co.uk)  
[mail@clarence-trustees.co.uk](mailto:mail@clarence-trustees.co.uk)  
[mail@eh-taylors.co.uk](mailto:mail@eh-taylors.co.uk)

Depending on which of our services you use we may collect the following information:

- Name
- Email Address
- Telephone Number
- Postal Address
- Business Name
- Service you are interested in

## When, Why and How We Gain Consent (Legal Basis)

We will not collect any information about you without your explicit consent.

We will ask your consent every time we need to collect personal information about you.

We will explain in a clear simple terms why we want to collect your information and what we will

do with it before seeking your consent so you are fully informed and you will be given a clear and unambiguous option to opt in to any communications or services we might want to offer you.

## **Why We Collect Personal Data**

We collect information about you to process your order and manage your account.

We may collect and analyse information for the purpose of providing personalised products.

We also use it to recommend things we think you will like.

We may use it to contact you because you have indicated that you would like us to call you back or email you.

We may use it to notify you about things you've told us you like.

We also use it for business, regulatory and legal purposes, like:

- Dealing with any requests you make or content you submit.
- Getting in touch if we need to tell you about something, like a change to our policies or issues with a service.

## **Who Processes the Data We Collect (Who are the recipients of your data?)**

We will store and process your data following industry best practice and security.

We will take all reasonable steps to ensure that there are appropriate arrangements in place that includes provisions covering the appropriate secure transfer, handling and processing of the personal information by those entities and third parties.

- Some of that processing takes place at Hadleigh, Benfleet in UK.
- Some of that processing takes place in Southend-on-Sea, in UK.
- Some of the processing may take place outside of the UK but within the EEA and covered by GDPR.

Where processing takes place by one of our trusted data processors, we ensure that our contracts with those 3rd parties contain the appropriate GDPR model clauses and that all our 3rd parties are also compliant with GDPR. This affords your data the same protection away from our organisation, as it does within it.

The data we collect through our online services may be processed by one or more of the following (all being part of our group of companies):

Company A: The Antony J. Holdsworth Co Ltd t/a Antony J. Holdsworth & Co  
Company B: Clarence Trustees LLP  
Company C: Estuary House Tax LLP t/a E. H. Taylors

## **Where We Might Send Your Personal Data (Geographically)**

We process data within the EEA and countries deemed by the European Union as having adequate safeguards for protecting personal data. These countries are recognised by the EU as having suitable

safeguards for the rights and freedoms of individuals and recourse processes by which data subjects can exercise their rights.

We will only consider transferring your data outside of the EU where the transfer is:

- made with your explicit informed consent;
- necessary for the performance of a contract between you and this organisation or for pre-contractual steps we need to take at your request;
- necessary for the performance of a contract made in your interest between this organisation and another person;
- necessary for important reasons of public interest;
- necessary for the establishment, exercise or defence of legal claims;
- necessary to protect your vital interests or those of other persons, where you are physically or legally incapable of giving consent;

OR

- made from a register which under UK or EU law is intended to provide information to the public (and which is open to consultation by either the public in general or those able to show a legitimate interest in inspecting the register).

## **How Long We May Keep Your Data**

The data referenced above in section - Data We collect:

- Is kept in our active file for 6 months
- After 6 months it is moved to a dormant state
- After 12 months is deleted from our systems

We use Active records for some or all of the activities detailed in the section above - Why We Collect Personal Data.

If we have recorded no positive activity from you after 6 months your record will become dormant  
If there is no positive activity from you within 12 months we will delete your records

Positive activity means that you open, read, interact with either the website or through any of the communication methods we use to contact you.

It is our responsibility to be able to demonstrate this positive activity and if we cannot then your details will become dormant and eventually be deleted.

We may from time to time request that you create an affirmative action via email or our website to keep your record active, if we are unable to determine it automatically.

## **Your Rights as an Individual in Respect of the Data We Hold**

We respect the rights and freedoms of individuals and as such we would like to make you aware of the following.

You have the right to:

- Request access to your data

- Request rectification of your data where there are errors or inaccuracies or the data is not current
- Request that the data we hold is removed entirely from our systems
- Request us to restrict processing of your data
- Object to our processing of your data
- Request your data in a format that is commonly used/accepted
- Send your data to another controller
- Withdraw consent already provided - at any time

You also have the right to complain to this organisation.

To exercise your rights above please contact any of the Data Protection Officer, Data Controller or Company representative via any of the channels provided.

You also have the right to lodge a complaint with a supervisory authority. In this instance this is the ICO and their contact details are as follows:

<https://ico.org.uk/concerns/handling/> or call the ICO on 0303 123 1113.

## Quick Links for Exercising your Rights

DPO Email Address:	<a href="mailto:bjw@antonyjholdsworth.co.uk">bjw@antonyjholdsworth.co.uk</a>
DPO Phone Number:	01702 333337
Controller Email Address:	<a href="mailto:bjw@antonyjholdsworth.co.uk">bjw@antonyjholdsworth.co.uk</a>
Controller Phone Number:	01702 333337

## Data Sources – How We Obtained Your Data

Any and all data in respect of “Data We Collect,” is collected directly from you, the individual.

We do not collect any of your personal data from any other sources. This includes any publicly accessible list and or data sources, whether in the public domain or if we have a legitimate interest to be able to access those sources legally.

## Do we have a Statutory or Legal Right to hold this data?

We have no statutory or legal right to hold the data you have provided, and detailed in respect of “Data We Collect.”

We rely on consent to collect and store this data, and uphold all of the individual’s rights and freedoms with respect to personal data given by consent.

See section – “Your Rights as an Individual in Respect of the Data We Hold.”

## Automated Decision Making, Profiling, and What that Means for You

Any and all data in respect of “Data We Collect,” is not subject to any automated decision making.

We do not profile you using your data, any actions taken by us or our systems are as a direct result of explicit requests or consents you have chosen.

There are no foreseeable consequences of any significance in respect of providing the data or being removed from the records, except that we will not be able to contact you.

## **Cookie Policy**

Please refer to the separate Cookie Policy on this site (see link in website footer).

### **In Summary**

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer, tablet or mobile phone (all referred to here as a "device") web browser from a website's computer and is stored on your device's hard drive.

Each website can send its own cookie to your web browser if your browser's preferences allow it. Many websites do this whenever a user visits their website in order to track online traffic flows.

Similar technologies are also often used within emails to understand whether the email has been read or if any links have been clicked.

If you continue without changing your settings, you are agreeing to our use of all cookies on the Group's websites, including this website. However, you can change your cookie settings at any time.

This particular website's cookies record information about your online preferences and allow us to tailor our website to your interests.

During the course of any visit to any of the Group's websites, the pages you see, along with a cookie, are downloaded to your device. Many websites do this, because cookies enable website publishers to do useful things like find out whether the device (and probably its user) has visited the website before. This is done on a repeat visit by checking to see, and finding, the cookie left there on the last visit.