**Template External Privacy Statement**

**IMPORTANT NOTICE: This document is issued in association with the ICAS Guide – 'Preparing for GDPR' - and is issued subject to the terms of the disclaimer contained within that Guide.**

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| **General Note to Users: This is a template for a GDPR privacy statement, which could be completed and used by a CA firm to explain its data processing activities to third parties.**  **Users may find the guidance issued by the Article 29 Working Party on Transparency to be helpful in understanding the regulatory expectation as to the content and level of detail that should be included. This guidance can be accessed via this** [**link**](http://ec.europa.eu/newsroom/article29/news.cfm?item_type=1360)**.**  **Users should remember that it is important that the privacy statement is as accessible and intelligible as possible. Where a firm has different service lines, such as accountancy and insolvency services, then consider, for example, whether the information provided under some of the headings might be broken down by service line to aid understanding.** |

**Who we are**

This is the privacy statement of [●] [*designate*]:

**[*Note: Describe the entity that the privacy statement covers*]**

This privacy statement explains how we collect and use personal information about you.

**What personal information we collect**

**[*Note: describe the categories of information processed*]**

**Where we collect personal information from**

**[*Note: describe the source(s) of personal information, including whether it comes from publicly available resources*]**

**How we use your personal information**

**[*Note: Include here the purpose(s) of the processing and the legal basis for processing – remember where legitimate interests are relied on, they need to be called out although you don't need to use the term, 'legitimate interests'. The purposes for which personal information is processed may include any or all of the following (the list is non-exhaustive)***

* ***deliver services and meet legal responsibilities***
* ***verify identity where this is required***
* ***communication by post, email or telephone***
* ***understand needs and how they may be met***
* ***maintain records***
* ***process financial transactions***
* ***prevent and detect crime, fraud or corruption*]**

**Who we share your personal information with**

**[*Note: describe the recipients of data/data sharing with named third parties, including intra-group sharing.*]**

**How we use your information to make automated decisions**

**[*Note: include information concerning logic etc if processing is automated. If no automated decisions are made then delete.*]**

**If you do not provide your personal information**

**[*Note: set out any consequences of not providing information where the information is required by statute or contractual requirement. Delete if not applicable.*]**

***How long we retain your personal information for***

***[Note: explain the data retention period(s) that apply to the personal information you process.*]**

***Holding personal information outside the EEA***

**[*Note: where information is held internationally, give an explanation of where data may be held and the safeguards deployed to protect it.*]**

**Using our website**

**[*Note: include privacy information specific to the website use*.]**

**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.
* We are using that information with your consent and you have withdrawn your consent – see *Withdrawing consent to using your information* below.
* 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.

***Objecting to how we may use your information*** – You have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, 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.

***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 this is no longer a basis for using your personal information but you don't want us to delete the data. Where this right to 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.

***Automated processing*** – If we use your personal information on an automated basis to make decisions which significantly affect you, you have the right to ask that the decision be reviewed by an individual to whom you may make representations and contest the decision. This right only applies where we use your information with your consent or as part of a contractual relationship with you.

***Withdrawing consent using 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 the *Contact information and further advice*section if you wish to exercise any of these rights.

**Changes to our privacy statement**

We keep this privacy statement under regular review and will place any updates on this website. Paper copies of the privacy statement may also be obtained [*how/where?*].

This privacy statement was last updated on [*date*].

**Contact information and further advice**

[***Note****: Insert relevant contact details including those of the DPO*]

**Complaints**

We seek to resolve directly all complaints about how we handle personal information but you also have the right to lodge a complaint with the Information Commissioner's Office, whose 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>