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## **About MNE and this policy**

Our official name is MNE Accounting Limited and our registered office and trading address is The Phoenix Yard, Upper Brown Street, Leicester, LE1 5TE.

This is our privacy policy and it covers how we use, store and look after your information.

We have appointed a data protection officer to oversee compliance with this privacy notice.

### **What if I don't agree to your terms?**

If you don't agree to the terms in this policy we are unable to work for you or your business.

By providing us with personal information, you're consenting to the collection, use, disclosure, and retention of your information as described in this policy.

### **What if your policy changes?**

We review our privacy policies regularly - and therefore they are likely to be amended if we deem an amendment to be necessary. We will always provide both our most up to date policy and any archived versions on our website. When changes are made we may not communicate them directly but we will always make clear any changes that have been made to a version you have previously read.

### **What data do you collect from me?**

The information we collect from you will depend on the nature of our relationship. In most cases, the data we collect and process will be provided to us by you.

Information we could collect:

- Your name
- Your marital status
- Your address
- Your date of birth
- Your email address
- Your phone number
- Your personal identification documents
- Your National Insurance number

This list is not exhaustive.

We will only collect the information that is needed to provide the product or service you have requested, or to comply with our legal obligations.

## **Why do you need to collect and use my data?**

In a nutshell, we need your data to make sure you are who you say you are. As accountants, we are bound by legal and ethical policies - one of those policies is Anti Money Laundering (AML). As a director or owner of a business that we are engaged with, we have to hold your personal details to allow us to run the checks that we are required to do, such as verify your identity to comply with AML rules.

We will only ever collect and use information which is personal to you where it is necessary, fair and lawful to do so. That is to say, we will only do so where:

- You have given us permission to obtain and process the information to enable us to provide the product or service you have requested for you or for the business that you act for
- It is necessary to enable us to provide the product or service that you have requested
- The processing is necessary for us to carry out our agreed services, such as submitting data to HMRC
- We are required to process information to meet our legal or regulatory obligations, for example:
  - To adhere to requirements imposed by our regulatory body, The Association of Accounting Technicians (AAT)
  - Compliance with HMRC regulations, for example retaining information for specified lengths of time
- In the legitimate interests of MNE Accounting Limited, so that we can manage our business effectively, understand our clients and improve the products and services that we offer

At least one of the above basis will apply whenever we process your personal data.

## How is my data collected and looked after?

### How do you collect my information?

We collect your data in a number of ways:

- A meeting between us
- During telephone conversations with us
- By emails or letters that you send to us

We may also obtain personal information about you from other sources:

- When an existing client or another introducer, such as a solicitor, recommends our services to you. However, this would only occur if you had permitted the other party to pass this information on to us. The personal information would be restricted to essential data such as your contact details
- Communication from another service provider (for example your previous accountant)
- Communication from HMRC

All information that you send to us that isn't required by us but is incidental to the information we hold for you (for example you send us a payslip from a previous employer to give us your National Insurance number) may be held on our email servers.

### How we use your personal data

We use your personal data to:

- Provide accounting services and advice to you or your business
- Comply with regulatory and legal requirements

Your data may be gathered, recorded, stored, transferred, posted or submitted in various formats:

- Electronically - our storage system is digital and the majority of business transactions are conducted electronically
- Emails that are sent between us and other parties
- Telephone conversations are recorded and are stored electronically
- In paper format, such as letters and reports sent and received

We undertake to protect your personal data at all times, in a manner which is consistent with our duty of professional care and the requirements of the General Data Protection Regulation (GDPR)

and any subsequent data protection legislation. This includes taking reasonable security measures to protect your personal data in storage.

## **How do you store my data?**

Our own employees' access to our IT systems is reviewed weekly and adjusted as necessary. Only directors at MNE have access to all client data.

As we're a 100% paperless business, all of our data is held electronically with service providers who are industry leading (and their security policies have been assessed by us to ensure compliance with our policies).

We store all of our data in the cloud with state of the art providers. We implement two-factor authentication where possible and passwords are never shared within our team. For security reasons we never disclose which software providers we use, however this doesn't affect your rights under the GDPR.

Any paper documentation that is temporarily held by us is securely stored in an area of our building that is inaccessible by anyone other than directors and senior managers. We shred or return documents that we don't need to hold.

Telephone conversations are recorded and stored on a secure telephone-dedicated server based at MNE.

## **Do you hold on to old information?**

We do this for as long as we have a need to do so. We are governed by laws which require us to prove the identity of all of the people we are engaged to work for. For this reason, the information we retain after a client leaves us, is always relevant to our legal requirement to do so.

Sometimes the information we hold is relevant to another area of our firm for which we're engaged as accountants. For example if you are also an employee of a business client, we will need to hold certain information about you if it is relevant to this type of work.

## **What about MNE acting as a "Data Processor"?**

In some cases, MNE is known as the "Data Controller", which means that it's our responsibility to hold the right data for the right reasons and in the right way. In other cases, we're known as the "Data Processor" which means we have access to information that other people or entities are responsible for.

There are three main areas in which MNE acts as Data Processors, which are outlined below:

- [Our lettings \(client accounting\) service](#)  
We have access to information about clients' landlords, tenants and contractors' details as part of our client accounting work.
- [Our payroll bureau](#)  
This part of our work holds information about clients' employees, which is necessary for us to process their payroll.
- [Our outsourcing service](#)  
Although this area of our work doesn't specifically require us to process information about individuals, it may incidentally

In all these cases, we ask our clients who engage with us as Data Processors to ensure that they are compliant with the GDPR. Additionally, that our clients make their employees and/or third parties aware of their rights and our clients' responsibilities in accordance with the GDPR.

This data is occasionally held on our servers where the scope of our work requires it to be held. For example if we prepare payroll for a client, we will need to hold their employees' data on our payroll systems. This is done in accordance with the other parts of this policy.

## **Will you use my personal data for marketing purposes?**

Put simply, no. This will never routinely happen for marketing purposes. The only thing you may see is where we have relevant advice to give to you which is more appropriate to be delivered in a bulk email style. These aren't newsletters but an efficient way of getting the right pieces of advice to you.

## **Can I ask to see what data you hold about me?**

Under the GDPR you have the right to ask for this data, known as a subject access request. Contact the MNE Data Protection Officer at [privacy@mneaccounting.co.uk](mailto:privacy@mneaccounting.co.uk) and you will receive a response not later than one month from the date of your request.

## Where do you store my data and who can see it?

### Do you share my data with third parties?

We don't share your data with any third parties except for when:

- You ask us to collaborate with third parties
- You give us your consent to do so
- An authority requires us to do so - for example, HMRC or authorities connected to Anti Money Laundering regulations
- The law asks us to do so

We don't use your data in any other way other than as detailed in this policy.

### Where is my information processed?

We never allow data to be passed outside of the EU for processing. Data is stored in the cloud and so there may be data held outside of the EU by our software partners. In these cases, we have verified that the providers are compliant with the GDPR.

### Are there any risks of data being shared with people I haven't agreed to?

Yes, but never knowingly by MNE. Some common examples are:

- Giving an individual access to your accounting system which holds personal information about you or others
  - Modern accounting systems often have the ability to upload documents or reports to transactions or a storage area of the system. For example, this could cause a problem where access to the system is given to an employee and they have access to all other employees' personal information
  - We will never give access to your system to an individual unless you request us to do so and we have explicit consent. The only users we will ever add without your consent are those employed by MNE.
- Forwarding emails that contain information not relevant to the purpose of the email but contain personal information

## Some final things to consider

### What if the information you hold for me changes?

You have a duty to inform of us changes to your personal information. Please keep us informed if your personal information changes during your working relationship with us.

You have what's known as the "right to rectification" under the GDPR which means you are able to ask us to amend anything we store that you feel isn't correct. We will make any such amendments within one month.

### Can I ask you to 'forget' me?

Yes, of course. We don't hold information unless we have to as detailed in the sections above. If we have no legal obligation to continue to store the information we hold about you, we will securely delete the information.

### Can I object to the processing of my personal data?

Yes. You need to send your request in writing to us (our address is detailed in the 'Who is MNE?' section above). Where the legal basis under which MNE is processing your data is because you have given us consent, you do not have the right to object but you can withdraw your consent.

### Can I withdraw consent for you to hold my information?

Yes you can. However, if we need to hold your information for legal or compliance reasons, we will need to continue to do so.

### Can I make a complaint?

Yes. When engaging with us, you will have been issued with our "working together, better" policy which outlines our complaints procedure relating to the work we do for you. If you have a specific complaint about the way in which your data is stored or processed (regardless of whether you engaged with us), please email [privacy@mneaccounting.co.uk](mailto:privacy@mneaccounting.co.uk).

### How can I contact you about this policy?

If you'd like to talk to us about this policy, please send us an email at [privacy@mneaccounting.co.uk](mailto:privacy@mneaccounting.co.uk).