



## The purpose of this document:

This Privacy Notice sets out the obligations of the following businesses, collectively referred to as the “Total Tax Group”,

- The Total Tax Group Ltd, a Total Tax Group registered in the UK under number 04834932, whose registered office is at 17 Glasshouse Studios, Fryern Court Road, Fordingbridge, Hampshire, SP6 1QX
- The Total Tax and Accounts Ltd, a Total Tax Group registered in the UK under number 08303115, whose registered office is at 17 Glasshouse Studios, Fryern Court Road, Fordingbridge, Hampshire, SP6 1QX
- The Total Tax Consultancy Ltd, a Total Tax Group registered in the UK under number 08796040, whose registered office is at 17 Glasshouse Studios, Fryern Court Road, Fordingbridge, Hampshire, SP6 1QX

regarding data protection and the rights of our clients (“data subjects”) in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).

Total Tax Group understands that your privacy is important to you and that you care about how your personal data is used by us. We respect and value the privacy of all of our clients and will only collect and use personal data in ways that are described here, and in ways that are consistent with our obligations and your rights under the law.

In connection with your engagement with us for our services, Total Tax Group is a third party “data processor”. At all times you (our client) remain the “data controller”.

## 1. How to Contact Us about your Personal Data

Please contact our Data Protection Officer by post, email or by telephone:

Sophia White  
Total Tax Group  
17 Glasshouse Studios  
Fryern Court Road  
Fordingbridge, Hampshire  
SP6 1QX

[gdpr@totaltaxgroup.co.uk](mailto:gdpr@totaltaxgroup.co.uk)

01425 656 660

We are regulated by the Information Commissioner’s Office insert <https://ico.org.uk/>

The Total Tax Group Ltd, Total Tax and Accounts Ltd, and Total Tax Consultancy Ltd are regulated by the Chartered Institute of Taxation Insert <https://www.tax.org.uk/homepage>

## 2. What Does This Privacy Notice Cover?

This Privacy Notice explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.



### 3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

### 4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data.
- b) The right to access the personal data we hold about you.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, **and** that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us.

Further information about your rights can also be obtained from the Information Commissioner’s Office.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office.



## 5. What Personal Data Do We Collect?

We may collect some or all of the following personal data and other data:

- Name
- Date of birth
- Gender
- Address
- Email address
- Telephone number
- Business name
- Job title
- Profession
- Payment information
- Financial information

Your personal data may also be obtained by us from the following types of third parties:

- Your Independent Financial Adviser
- Your Bank and other financial institutions
- HMRC

## 6. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for one of the following purposes:

- Supplying our services to you - your personal details are required in order for us to enter into a contract with you and to provide our agreed service/s to you.
- Communicating with you – your personal details are required in order for us to correspond with you via by email, telephone and post.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, and telephone, and text message, and post with information, news, and offers on our services.

We will supply you with marketing information by email and post that you have opted-in to receiving and you may unsubscribe or opt-out at any time.

You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out of any of our marketing.



## 7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason/s for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

### Potential clients - data retention period:

- Should you make an enquiry of us, with regards to taking up our service/s, we will retain the data you provide for a maximum period of six weeks. If you do not become a client, we will then destroy your personal data. If you become a client, your personal data will then be kept in line with our client data retention period.

### Client data – data retention periods:

- HMRC insist on personal tax record being kept for six years, and they are currently looking to extend this requirement to 12 years. We will keep your personal data for 12 years in normal circumstances.
- HMRC can ask for information on personal tax records for 20 years in instances of suspected tax fraud, we will therefore keep your records for 20 years unless you expressly request us to delete your personal data after 12 years.
- The combination of the two above retention period policies mean that if we do not hear from you otherwise, we will keep your personal data for 20 years.

### Disengaged clients – data retention period:

- If you no longer require our services we will agree with you the length of time you wish us to retain your personal data.
- If you do not clearly instruct us to hold your personal data for an agreed time, we will destroy your personal data six months after the dis-engagement of our services to you.

## 8. How and Where Do You Store or Transfer My Personal Data?

We use third party software to process your personal data to provide our services to you. Here is a list of our current third-party software providers, links to their websites for you to view their Privacy Notices/Policies, and how your data used and stored:

| Software provider | Software providers' website                                 | Use                                                                                                                                                                      | Where your data is stored |
|-------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| CCH               | <a href="https://www.cch.co.uk/">https://www.cch.co.uk/</a> | Personal Tax Returns<br>Business Accounts<br>Business Tax Returns<br>Company Secretarial<br>Trust Accounts<br>Trust Tax Returns<br>Estate Accounts<br>Estate Tax Returns | MS Azure<br>WVD           |



| Software provider | Software providers' website                                                                                             | Use                                                    | Where your data is stored by us |
|-------------------|-------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|---------------------------------|
| Xero              | <a href="https://www.xero.com/uk">https://www.xero.com/uk</a>                                                           | Bookkeeping<br>Payroll                                 | Xero's servers                  |
| Sage              | <a href="https://www.sage.com/en-gb/">https://www.sage.com/en-gb/</a>                                                   | Bookkeeping<br>Payroll                                 | MS Azure WVD                    |
| Moneysoft         | <a href="https://moneysoft.co.uk/">https://moneysoft.co.uk/</a>                                                         | Payroll                                                | MS Azure WVD                    |
| Microsoft Azure   | <a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a> | Email<br><br>Data Storage<br>(Windows Virtual Desktop) | MS Azure WVD                    |

## 9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to one important exception. In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We contract with the above third parties referred to in Part 8 above, who supply software services to us to enable us to process your personal data (this list is not exhaustive and may be added to from time to time). In some cases, those third parties may require access to some or all of your personal data that we hold.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

## 10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 1.



There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 14 working days of receipt and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 11. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website [www.totaltaxgroup.co.uk](http://www.totaltaxgroup.co.uk)