

## GENERAL DATA PROTECTION REGULATIONS

### DATA PROTECTION POLICY AND PROCEDURES

#### 1. Data Protection

We confirm that we will comply with the provisions of the General Data Protection Regulation (GDPR) when processing personal data.

Processing means:

- obtaining, recording or holding personal data; or
- carrying out any operation or set of operations on personal data, including collecting and storage, organising, adapting, altering, using, disclosure (by any means) or removing (by any means) from the records manual and digital.

The information we obtain, process, use and disclose will be necessary for:

- the performance of the contract
- to comply with our legal and regulatory compliance and crime prevention
- contacting you with details of other services where you have consented to us doing so
- other legitimate interests relating to protection against potential claims and disciplinary action against us.

This includes, but is not limited to, purposes such as updating and enhancing our client records, analysis for management purposes and statutory returns.

In regard to our professional obligations, we are a member firm of the Association of Accounting Technicians (AAT). Under their ethical and regulatory rules of AAT I am required to allow access to client files and records for the purpose of maintaining our membership of this body.

Further details on the processing of data are contained in our privacy notice, which should be read alongside these terms and conditions.

#### 2. Electronic and Other Communication

As instructed, we will communicate with you and with any third parties you instruct us to as set out in our covering letter and privacy notice via email or by other electronic means. The recipient is responsible for virus-checking emails and any attachments.

With electronic communication there is a risk of non-receipt, delayed receipt, inadvertent misdirection or interception by third parties. We use virus-scanning software to reduce the risk of viruses and similar damaging items being transmitted through emails or electronic storage devices.

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Six Wands Aspects Limited  
Is a Limited company registered in England & Wales  
Registered office address: Office FF6, 19 Hereward Rise, Halesowen, West Midlands B62 8AN  
Telephone: 0121 289 2080  
Company Registration number **11103025**  
**Domain: [www.6wands.com](http://www.6wands.com)**

However, electronic communication is not totally secure and we cannot be held responsible for damage or loss caused by viruses, nor for communications that are corrupted or altered after despatch. Nor can we accept any liability for problems or accidental errors relating to this means of communication, especially in relation to commercially sensitive material. These are risks you must accept in return for greater efficiency and lower costs. If you do not wish to accept these risks, please let us know and we will communicate by hard copy, other than where electronic submission is mandatory.

Any communication by us with you sent through the post or DX system is deemed to arrive at your postal address two working days after the day that the document was sent.

When accessing information held electronically by HMRC, we may have access to more information than we need and will only access records reasonably required to carry out the contract.

You are required to keep us up to date with accurate contact details at all times. This is important to ensure that communications and papers are not sent to the incorrect address.

### 3. Data Collection

We collect only personally identifiable information that is specifically and voluntarily provided by visitors to Six Wands Aspects Limited's website. Six Wands Aspects receives limited identifiable information, such as name, Title, company address, email address, and telephone and fax numbers, from website visitors. Typically, identifying information is collected to:

- Register for certain areas of the site
- Inquire for further information
- Distribute requested reference materials

Demographic information, including gender and occupation, is not actively sought. It is Six Wands' policy to limit the information collected to only the minimum information required to complete a visitor's request. In any instance where non-mandatory information is sought, the website visitor will be notified of this at the point of collection.

Visitors are also able to send email through the site. Their messages will contain the user's screen name and email address, as well as any additional information the user may wish to include in the message.

Six Wands Aspects Limited's intention is not to seek any sensitive information through our website unless legally required for recruiting purposes. Sensitive information includes a number of types of data relating to race or ethnic origin; political opinions; religious or other similar beliefs; trade union membership; physical or mental health; sexual life or criminal record. We suggest that you do not provide sensitive information of this nature.

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If you do wish to provide sensitive information for any reason, Six Wands Aspects Limited's accepts your explicit consent to use that information in the ways described in this privacy statement or as described at the point where you choose to disclose this information.

#### 4. Use of data

A user may choose to provide personal information in the following examples:

- Participate in "join our mailing list" initiatives
- Contact us for further information.

If you would like to find out more about the different categories of information collected, please review the data collection section.

Information attained by the site is used only for the intended purpose stated at the time that the information is collected. This data is not shared with other entities for secondary or unrelated purposes, or shared with a third party, unless otherwise disclosed at the point of collection. If there is an instance where such information may be shared, the visitor will be asked for permission beforehand.

Six Wands Aspects Limited makes every practical effort to avoid excessive or irrelevant collection of data. If a visitor believes the site has collected excessive information, we encourage the visitor to contact us at [info@6wands.com](mailto:info@6wands.com) to raise any concerns.

Except for the mailing list initiative described above, where visitors explicitly choose to receive specific Six Wands Aspects Limited marketing or other materials, Six Wands Aspects Limited will not use personal data collected from our websites to facilitate unsolicited marketing activities.

#### 5. Cookies and Log Files

Cookies may be used on some pages of our site. "Cookies" are small text files placed on your hard drive that assist us in providing a more customised website experience. For example, a cookie can be used to store registration information in an area of the site so that a user does not need to re-enter it on subsequent visits to that area. It is Six Wands Aspects Limited policy to use cookies to make navigation of our websites easier for visitors and to facilitate efficient registration procedures. Site statistics are compiled by third parties, and therefore your IP address will be passed to third parties for statistical reporting only.

If you are concerned about cookies, most browsers permit individuals to decline cookies. In most cases, a visitor may refuse a cookie and still fully navigate our website, however other functionality in the site may be impaired. After termination of the visit to our site, you can always delete the cookie from your system if you wish.

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In order to properly manage our website, we may anonymously log information on our operational systems, and identify categories of visitors by items such as domains and browser types. These statistics are reported in the aggregate to our webmasters. This is to ensure that our website presents the best web experience for visitors and is an effective information resource.

## 6. Third Parties

It is Six Wands Aspects Limited policy only to disclose information to third parties under the following circumstances:

- As required by law through subpoena, search warrant or other legal process
- When explicitly requested by a visitor

Six Wands Aspects Limited website does not collect or compile personally identifying information for dissemination or sale to outside parties for consumer marketing purposes, or host mailings on behalf of third parties.

## 7. Third Party Links

There are several places throughout [accuraaccountants.com](http://accuraaccountants.com) that may link to other websites that do not operate under [accuraaccountants.com](http://accuraaccountants.com) privacy practices. When you link to other websites, Six Wands Aspects Limited privacy practices no longer apply. We encourage visitors to review each site's privacy policy before disclosing any personally identifiable information.

## 8. Data Retention

Some of the information we receive is not retained. For example, we usually do not keep mailing addresses for white papers. Contact information about visitors (such as information generated through registration for access to areas on the site) will be kept as long as the information is required to completely service the contact request or until a user request that we delete that information. Mailing list information and email are kept for only the period of time considered reasonable to facilitate the visitor's requests.

## 9. Choices

As a policy, visitors are not required to register to gain access to areas of the Six Wands Aspects Limited website.

Personally identifiable information provided to Six Wands Aspects Limited through its website is provided voluntarily by visitors. Should visitors subsequently choose to unsubscribe from mailing lists, we will provide instructions on the appropriate website area or in communications to our visitors; or a visitor may contact the webmaster of the appropriate site.

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## 10. Access

Each visitor has the right of access to personal data they have submitted through the websites to Six Wands Aspects Limited.

User updates of information should be handled by going back through the registration process. Inquiries about the accuracy of identifying information previously submitted to Six Wands Aspects Limited through its website, or requests to have outdated information removed, should be directed to: [info@6wands.com](mailto:info@6wands.com). Six Wands Aspects Limited is committed to providing reasonable and practical access to visitors to allow them the opportunity to identify and correct any inaccuracies. When requested and practical, Six Wands Aspects Limited will delete identifying information from current operational systems.

When personally identifiable information is retained, Six Wands Aspects Limited assumes responsibility for keeping an accurate record of the information once a visitor has submitted and verified the data. Six Wands Aspects Limited does not assume responsibility for verifying the ongoing accuracy of the content of personal information. When practically possible, if Six Wands Aspects Limited is informed that any personal data collected through a website is no longer accurate.

Six Wands Aspects Limited will make appropriate corrections based on the updated information provided by the authenticated visitor.

## 11. Security

Six Wands Aspects Limited has implemented generally accepted standards of technology and operational security in order to protect personally identifiable information from loss, misuse, alteration or destruction. All Six Wands Aspects Limited employees follow a security policy. Only authorised Six Wands Aspects Limited personnel are provided access to personally identifiable information and these employees have agreed to ensure confidentiality of this information.

## 12. Children

Six Wands Aspects Limited understands the importance of protecting children's privacy, especially in an online environment. The Six Wands Aspects Limited site covered by this privacy statement is not intentionally designed for or directed at children 13 years of age or younger. It is Six Wands Aspects Limited' policy never to knowingly collect or maintain information about anyone under the age of thirteen.

## 13. Modifications

Six Wands Aspects Limited reserves the right to modify or amend this Statement at any time. To keep visitors informed, Six Wands Aspects Limited will notify users of changes to our Privacy Statement by prominently identifying the alteration for a period of not less than two weeks on our page at [www.6wands.com](http://www.6wands.com).

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N J Price  
For and on behalf of Six Wands Aspects Ltd

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