

## **Osian T Williams Cyf Website Privacy Statement**

**The Purpose** of this privacy statement is to explain how Osian T Williams Cyf processes personal data to fulfil its data protection responsibilities. This statement will be supplemented by 'specific to client' privacy notices when needed. The scope of this statement covers all related activities by the staff of Osian T Williams Cyf which is referred to as OWC hereafter.

**The Role of OWC** in data protection terms is that of a data controller where it determines the purpose and use of personal data collected. Once received it becomes the responsibility of the OWC privacy manager (PM) to ensure that it is processed in accordance with the latest UK data protection legislation. You can contact the PM using [info@osianwilliams.cymru](mailto:info@osianwilliams.cymru).

OWC is also a data processor when it acts in accordance with the instructions of a data controller/client. Osian Williams is registered with the Information Commissioner's Office (ICO).

**The personal data processed by OWC** will be basic contact information for the purposes of responding to general enquiries, business development, preparing letters of engagement and setting up invoices. Due to the nature of the services being offered, it will also be necessary to collect financial data related to individuals. If OWC is not given all the required personal data, it may result in an incomplete service being provided.

**OWC's duty of confidentiality** means that OWC staff will treat your personal data with due respect and in confidence and will only disclose it to those that need to know it. OWC uses reasonable organisational and technical measures to ensure personal data is kept secure. OWC also expects the same duty of confidentiality of all third parties with whom it shares personal data. Sharing is kept to a minimum and reviewed regularly. Personal data, including remote back-ups, are processed in the UK and the EU only.

**OWC processes personal data against a lawful basis** as described below:

- To respond to your general enquiries and to promote our services, we will use our legitimate interests
- To comply with our legal obligations
- To fulfil our contractual obligations, including their prior preparation, as set out in the Letters of Engagement
- When processing a pre-defined purpose for which your consent has been sought and recorded prior to that processing commencing

**In all cases** the processing of your personal data by WO shall be in accordance with the principles of data protection, as set out in the UK data protection legislation.

**OWC will share personal data**, when necessary, with some or all of the following third parties:

- HM Revenue & Customs
- Solicitors appointed by OWC
- Independent Financial Advisors and similar third parties but only on request
- A third-party company registration service subject to a data processing agreement
- A third-party IT support company subject to a data processing agreement
- Companies House
- The Insolvency Service
- An Anti-Money Laundering Office
- Unspecified recipients but only when compelled to do so for legal reasons

OWC uses 'QuickBooks' on-line to process client information. You can read how QuickBooks processes personal data by visiting: <https://www.intuit.com/privacy/statement/>. Their statement includes a section for 'Country and Region-Specific Terms' which refers to the UK and EEA.

OWC uses 'Iris' business software to administer the business, which will process basic client personal data. For details on how Iris processes personal data, please read their privacy policy by visiting: <https://www.iris.co.uk/privacy-policy/#>.

**OWC follows a retention schedule** to determine the length of time it holds different types of personal data. The retention schedule is shown below:

- Routine correspondence for casual enquiries in hard copy or in emails will be stored for 6 years
- Service contract related data will be retained throughout the life of the engagement plus another 6 years following the termination of the contract
- Contact data is stored indefinitely unless a valid request to erasure is received from the interested data subject
- Financial records and invoices, which may include personal data, will be retained for 6 years after the end of the current tax year of processing
- By exception, documentation that includes personal data may be retained by OWC beyond the schedule, but only for a specific purpose and only when OWC believes there is a legitimate interest or a legal obligation to do so

**At the end of the retention schedule** OWC will either return, destroy or delete your personal data and any associated emails or relevant documentation. If it is technically impractical to delete electronic copies of personal data, it will put it beyond operational use. It should be noted that OWC allows up to 3 months after the retention schedule to complete the action.

**The website uses cookies** but visitors to the website are asked to consent to non-essential cookies before these are dropped – please see the separate cookie notice.

**The OWC website links** to appropriate business websites of interest. If these are used, you should be aware that the OWC has no responsibility for the control, content or handling of your personal data by these other websites.

**The UK General Data Protection Regulation defines the rights** that you have (although these do not apply in all situations); for convenience, these rights are shown below:

- Right to be informed as to how your personal data is being processed by OWC – this is done through this statement or specific to customer privacy notices
- Right to access your personal data held by OWC which is done by making a 'Data Subject Access Request' (DSAR) to the PM
- Right to rectification of your personal data if you believe OWC has collected it incorrectly or it needs to be updated
- Right to erasure of your personal data for which OWC no longer has a legitimate purpose to process
- Right to restrict processing under certain circumstances, during which time your personal data but will be out of operational use until the related matter is resolved
- Right to data portability of your personal data in a machine-readable version, as you have provided but only applicable to data provided with your consent or under contract
- Right to object to OWC processing your personal data for which it does not have a legal or contractual obligation
- Rights related to automated decision making and profiling (however OWC does not use these techniques in its decision making)

**Further details on data subjects' rights** can be found on the Information Commissioner's Office (ICO) website: <https://ico.org.uk>.

**Raising concerns, exercising rights or making queries** about how we are processing personal data can be done by contacting the PM. Please be aware that we will need to determine your identity before responding fully, therefore, you may be asked for proof of ID or other material that, in context, will enable us to confirm your identity. Alternatively, you have the right to contact the ICO directly, using the details provided above.

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