

Detox Reboot Ltd t/a Reth!nk.Tax[®] – Privacy Notice

1. Purpose of this notice

- 1.1. This notice describes how we collect and use personal data about you, in accordance with the General Data Protection Regulation (“**GDPR**”) and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK (“**Data Protection Legislation**”).
- 1.2. You agree that you shall read the following carefully to understand our practices regarding your personal data and how we will treat it.

2. About us

- 2.1. Reth!nk.Tax[®] is the trading name of Detox Reboot Limited, a company specialising in Tax consultancy. Our office is at 3rd Floor, 86 – 90 Paul Street, London, EC2A 4NE, and our company registration number is 09538143.
- 2.2. For the purpose of the Data Protection Legislation and this privacy notice, we are the “Data Controller”. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.
- 2.3. We have appointed a Data Protection Manager. Our Data Protection Manager is responsible for assisting with enquiries in relation to this privacy notice or our treatment of your personal data. Should you wish to contact our Data Protection Manager you can do so using the contact details set out in paragraph 12 (Contact Us), below.

3. How we may collect your personal data

- 3.1. We obtain personal data about you, for example, when:
 - 3.1.1. You request a proposal from us in respect of the services we provide;
 - 3.1.2. You engage us to provide our services and also during the provision of those services;
 - 3.1.3. You contact us by e-mail, telephone, post or social media (for example when you have a query about our services); and

- 3.1.4. It is made available from third parties and/or publicly available resources (for example, from your employer or from Companies House).

4. The kind of information we hold about you

- 4.1. The information we hold about you may include the following:
 - 4.1.1. Your personal details (such as your name and/or address);
 - 4.1.2. Details of contact we have had with you in relation to the provision, or the proposed provision, of our services;
 - 4.1.3. Details of any services you have received from us;
 - 4.1.4. Our correspondence and communications with you;
 - 4.1.5. Information about any complaints and enquiries you make to us;
 - 4.1.6. Information from research, surveys, and marketing activities; and
 - 4.1.7. Information we receive from other sources, such as publicly available information, or information provided by your employer.

5. How we use personal data we hold about you

- 5.1. We may process your personal data for purposes necessary for the performance of our Agreement with you and to comply with our legal obligations.
- 5.2. We may process your personal data for the purposes necessary for the performance of our contract with our clients. This may include processing your personal data where you are an employee, subcontractor, supplier or customer of our client.
- 5.3. We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.
- 5.4. We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

- 5.5. Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.
- 5.6. **Situations in which we will use your personal data:**
- 5.6.1. We may use your personal data in order to:
- 5.6.1.1. Carry out our obligations arising from our Agreement or any agreements entered into between you and us or any third party service providers we have introduced you to or with whom we engage you on your behalf in accordance with clause 3 of our terms & conditions (which will usually be for the provision of our services);
 - 5.6.1.2. Carry out our obligations arising from our Agreement or any agreements entered into between our clients and us or any third party service providers we have introduced you to or with whom we engage you on your behalf in accordance with clause 3 of our terms & conditions (which will usually be for the provision of our services) where you may be a subcontractor, supplier or customer of our client;
 - 5.6.1.3. Provide you with information related to our services and our events and activities that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes;
 - 5.6.1.4. Seek your thoughts and opinions on the services we provide; and
 - 5.6.1.5. Notify you about any changes to our services or provide you with any notification as may required in accordance with our terms & conditions.
- 5.6.2. We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.
- 5.6.3. If you refuse to provide us with certain information when requested, we may not be able to perform our Agreement we have entered into with you. Alternatively, we may be unable to comply with our legal or regulatory obligations.
- 5.6.4. In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

5.7. Data retention:

- 5.7.1. We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.
- 5.7.2. When assessing what retention period is appropriate for your personal data, we take into consideration:
 - 5.7.2.1. The requirements of our business and the services provided;
 - 5.7.2.2. Any statutory or legal obligations;
 - 5.7.2.3. The purposes for which we originally collected the personal data;
 - 5.7.2.4. The lawful grounds on which we based our processing;
 - 5.7.2.5. The types of personal data we have collected;
 - 5.7.2.6. The amount and categories of your personal data; and
 - 5.7.2.7. Whether the purpose of the processing could reasonably be fulfilled by other means.

5.8. Change of purpose:

- 5.8.1. Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.
- 5.8.2. Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

6. Data sharing

6.1. *Why might you share my personal data with third parties?*

- 6.1.1. We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.

6.2. **Which third party service providers process my personal data?**

6.2.1. “Third parties” includes third-party service providers used by us, and any third party service providers we have introduced you to or with whom we engage you on your behalf in accordance with clause 3 of our terms & conditions. These may include other tax or accounting professionals, and third party service providers that provide any of the following activities: IT and cloud services, Anti Money Laundering verification, professional advisory services, administration services, marketing services and banking services.

6.2.2. All of our third party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third party service providers to process your personal data for specified purposes and in accordance with our instructions.

6.3. **What about other third parties?**

6.3.1. We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with the law.

7. **Transferring data outside of the European Economic Area (“EEA”)**

7.1. The majority of our data processing is done in the UK and EEA. However there may be occasions where data is transferred to and processed in countries outside the EEA.

7.2. Where data is transferred outside of the EEA we will ensure that adequate security measures are put in place to protect your personal data. These include ensuring there is a European Commission adequacy decision in relation to the country or the companies processing the data are Privacy Shield certified.

8. **Data Security**

8.1. We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents,

contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

- 8.2. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9. Rights of access, correction, erasure, and restriction

9.1. Your duty to inform us of changes

- 9.1.1. It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

9.2. Your rights in connection with personal data

- 9.2.1. Under certain circumstances, by law you have the right to:
 - 9.2.1.1. Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully;
 - 9.2.1.2. Request correction of the personal data that we hold about you;
 - 9.2.1.3. Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below);
 - 9.2.1.4. Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis. You also have the right to object where we are processing your personal information for direct marketing purposes;
 - 9.2.1.5. Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it;

- 9.2.1.6. Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible; and
- 9.2.1.7. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.
- 9.2.2. You will not have to pay a fee to access your personal data (or to exercise any of the other rights).
- 9.2.3. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- 9.2.4. If you want to exercise any of the above rights, please e-mail our Data Protection Manager Martin Beadle, at martin@rethink.tax.

10. Right to withdraw consent

- 10.1. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please e-mail our Data Protection Manager Martin Beadle, at martin@rethink.tax.
- 10.2. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

11. Changes to this notice

- 11.1. Any changes we may make to our privacy notice in the future will be available on our website at www.rethink.tax or you may request a copy by e-mailing Martin Beadle, at martin@rethink.tax.
- 11.2. This privacy notice was last updated in April 2021.

12. Contact us

12.1. If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please contact:

Martin Beadle, at martin@rethink.tax

12.2. You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone – 0303 123 1113

Website – <https://ico.org.uk/make-a-complaint/>