



**Strong & Herd LLP**  
**Privacy Policy**

We are committed to safeguarding the privacy of our clients and we want you to feel secure whilst engaged with us in business; this policy sets out how we will treat your personal data.

**THIS PRIVACY POLICY**

This Privacy Statement outlines how we may use any personally identifiable data about you and the ways in which we protect and treat such data that we collect when you use our site.

**PERSONAL DATA THAT WE COLLECT**

We may collect, store and use the following kinds of personal data:

- Data about you (including your Name, Email Address, Contact Number and Business Information).
- Data that you provide to us for the purpose of engaging with us in accordance to legislation to use our professional services.
- Data that you provide to us for the purpose of subscribing to our online services, email notifications and/or newsletters.
- Any other data that you choose to send to us.
- We have used Legitimate Interest (LIA) as outlined in GDPR to maintain our mailing lists where we can show that people have opened or interacted with information or marketing information provided by Strong & Herd. As well as being able to opt out at any time you can also change/amend your preferences on what you receive from us.

**COOKIES**

A cookie consists of data sent by a web server to a web browser, and stored by the browser. The data is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We may use both session cookies and persistent cookies on the website. We will use the session cookies to: keep track of you whilst you navigate the website. We will use the persistent cookies to: enable our website to recognise you when you visit.

Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. For example, in Internet Explorer you can refuse all cookies by clicking Tools, Internet Options, Privacy, and selecting Block all cookies using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites including sites operated by Strong & Herd LLP.



## HOW WE USE YOUR PERSONAL DATA

Personal data submitted to us will be used for the purposes specified in this privacy policy or in relevant parts of the services we provide.

We may use your personal data to:

- Enable your use of the services
- Enable your purchase of products via our webpages and the booking on public and on-line training courses run by Strong & Herd LLP
- Send you general (non-marketing) commercial communications
- Send you email notifications which you have specifically requested or required to alert you to important business documents
- Send to you our Spotlight newsletter and Customs Alerts in addition to marketing communications relating to our business [or the businesses of carefully-selected third parties] which we think may be of interest to you by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications)
- Retain training records to enable the assessment of Continuous Personal Development (CPD) for the issuance of relevant certificates/ qualifications
- Provide limited data to approved third-parties data about user login or email address in relation to specific secure portal access
- Deal with enquiries made by you in relation to our services
- Where you submit personal data for publication on our website, we will publish and otherwise use that data in accordance with the license you grant to us.
- We will not provide your personal data to any third parties for the purpose of direct marketing.

**UPDATING DATA:** Please let us know if the personal data which we hold about you needs to be corrected or updated by emailing [enquiries@strongandherd.co.uk](mailto:enquiries@strongandherd.co.uk)

**DISCLOSURES:** Strong & Herd LLP (S&H) is registered under the data protection laws in the United Kingdom and takes all reasonable care to prevent any unauthorised access to your personal data. We may disclose information about you to any of our employees, officers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes of engaging in business as set out in this privacy policy.

In addition, we may disclose your personal data:

- To the extent that we are required to do so by law;
- In connection with any legal proceedings or prospective legal proceedings;
- In order to establish, exercise or defend our legal rights (including providing data to others for the purposes of fraud prevention and reducing credit risk);
- To the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling; and
  - To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal data where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal data.
  - Except as provided in this privacy policy, we will not provide your data to third parties.



### SECURITY OF YOUR PERSONAL DATA

- We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal data.
- We will store all the personal data you provide on our secure (password- and firewall-protected) servers. All electronic transactions you make to or receive from us will be encrypted.
- When we transmit sensitive data (such as business accounts or personal tax data) over the internet, we post this data securely to our client portal that is protected through the use of encryption.
- You are responsible for keeping any portal access password and user details confidential. We will not ask you for your password
- Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

**POLICY AMENDMENTS:** We may update this privacy policy from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes. We may also notify you of changes to our privacy policy by email.

### YOUR RIGHTS

- You may instruct us to provide you with any personal data we hold about you. Provision of such data will be subject to:
  - The supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address)
  - We may withhold such personal data to the extent permitted by law.
- You may instruct us not to process your personal data for marketing purposes by email at any time. In practice, you will usually either expressly agree in advance to our use of your personal data for marketing purposes, or we will provide you with an opportunity to opt-out of the use of your personal data for marketing purposes.
- You may instruct us to remove personal data under your rights of the General Data Protection Regulation. Any removal will be limited to regulatory compliance and what is permitted by law.

**THIRD PARTY WEBSITES:** The company website may contain links to other websites. We are not responsible for the privacy policies or practices of third party websites.

**CONTACT:** If you have any questions about this privacy policy or our treatment of your personal data, please write to us by email to emailing [enquiries@strongandherd.co.uk](mailto:enquiries@strongandherd.co.uk) or by post to Strong & Herd LLP, Suite 5b Manchester International Office Centre (MIOC) Styal Road, Manchester M22 5WB, main telephone number 0161 499 7000.

**DATA CONTROLLER:** The data controller responsible in respect of the data collected Anthony Griffiths, Partner at S&H LLP.