

## GDPR Privacy Policy for TaxAction Consulting Ltd

TaxAction Consulting Ltd recognises the important changes introduced by GDPR and will adopt the following procedures. Its office holders and employees will comply with the following policy:

1. All directors, office holders and employees will undertake GDPR training via the PTP GDPR On-Line Training Course and will need to pass the Course Test and provide a Certificate of Completion to be maintained with company records.
2. TaxAction Consulting Ltd in providing tax advice to the instructing client ("IC"), for onward transmission to a data subject lay client ("LC") necessarily acts as a Data Processor and Data Controller under GDPR.
3. TA has no direct contractual relationship with the LC but nonetheless has a legal basis to process data under GDPR by virtue of providing tax consultancy services as a consequence of the contract LC has entered into with IC.
4. TA will seek appropriate warranties from ICs that personal data of the LC is provided to TA and its Consultants with the express written permission given by LC to IC.
5. TA in processing any personal data of the LC it will do so in accordance with the principles of GDPR and the rights of the LC as afforded by GDPR. This includes only obtaining data which is adequate, relevant and not excessive and such data shall be processed fairly and lawfully and TA will seek appropriate GDPR warranties from its Consultants.
6. Personal data of LC will not be used by TA for any purpose other than that for which the data has been specifically provided to TA by IC by way of instructions in relation to specific tax advice and data will be processed consistently for that purpose.
7. All data held by TA in relation to LC will be subject to technical and organisational measures by TA to ensure security whether personal data is held electronically, manually or via remote cloud-based services and TA will take reasonable steps to ensure that appropriate anti-virus software and firewalls are in place.
8. Unless GDPR provides to the contrary or the Information Commissioner's Office ("ICO") requires otherwise, TA will delete or destroy all personal data relating to the LC after a period of six years or sooner if LC makes a request in writing.
9. TA recognises the LC's right "to be forgotten" and further recognises the LC's right to have access to any personal data held by TA.
10. TA will not share LC's personal data with any third parties without the specific written consent of LC.

11. In the event of a breach or risk of breach of LC's personal data, TA will, if required under GDPR, report to the ICO within 72 hours and advise IC so LC may be made aware of any breach or risk of breach.

12. TA will ensure that personal data is not transferred out of the European Economic Area unless specific protections are in place.

13. TA will maintain a Data Map showing where and how data is processed