

Privacy Policy

ABOUT US

We, Brooksdale Ltd, are committed to safeguarding the privacy of our customers; this policy sets out how we will treat your personal information.

We are registered in England and Wales under company registration number 12159438. Our registered office address is Magnetic House, Waterfront Quay, Salford, England, M50 3XW.

We are a Data Controller, which means that we determine the purposes and the means of processing your personal information. We are registered directly with the Information Commissioner's Office (ICO) and our registration number is ZA545378.

This Privacy Policy sets out the basis on which we process your personal data and information in connection with your use of our services (your "personal information").

HOW WE COLLECT YOUR PERSONAL INFORMATION

FROM YOU

Most of the personal information we collect will be collected directly from you when you register for and use our services or interact with communications we send to you. We will collect this information from you through our websites, mobile applications or other similar devices, and our communications with you.

FROM ONE OF OUR PARTNERS

We work with partners who promote our Tax Refund claim services to you. If you are interested in our services, you will be able to ask for our partner to pass your personal information to us, to allow us to get in touch with you and/or progress Tax Refund claims on your behalf. Our partners will only ever pass your personal information to us with your consent.

FROM HMRC

As part of our services, with your consent, we will submit Tax Refund claims to HMRC. HMRC will send us information about your tax status and any refunds you may be due, as well as information about your engagement with their service.

OTHER SOURCES OF PERSONAL DATA

We may also use personal data from other sources, such as specialist companies that supply information, online websites, and social media channels. These other sources help us to:

- Review and improve the accuracy of the data we hold; and
- Improve and measure the effectiveness of our marketing communications.

THE PERSONAL INFORMATION WE COLLECT

- **Identity information** - This is information that helps us identify who you are, for example your title, name, and date of birth.
- **Contact information** - This is information that details how we can contact you, for example your address, email and/or telephone number.
- **Financial information** – When you provide your bank details or payment information when using our services.
- **User information** - This is information collected about you as a user of our services. For example, to provide you with a utility comparison service we require information about your utility provider, and energy use.

- **Interaction information** - This is information about how you interact with our services and communications, namely what you click on and interact with on websites or other media channels and any emails we send to you.
- **Technical information** - This is information about how you use our websites and other media channels. This could be information that identifies your device, its operating system, internet address, your login data, your location, where you were directed to our website from and where you leave to, as well as how often you visit.

HOW WE USE YOUR PERSONAL INFORMATION

TO PROVIDE OUR SERVICES TO YOU

- passing your personal information to HMRC with your consent when undertaking Tax Refund claims on your behalf;
- contacting you about your potential, or active Tax Refund claims; and
- responding to any enquiries that you make via email, post, or social media.

What is our legal basis for processing?

- Performance of a contract; or
- Legitimate Interests.

TO MARKET TO YOU

- contacting you about products and services which we think may be of interest to you, for example, by email, post, or social media; and
- inviting you to take part in and manage customer surveys, reviews, and other market research activities.

Should you no longer wish to receive information about similar products and services, you can withdraw your consent for or object to receiving marketing communications from us and we will stop processing your data for marketing purposes. You can object via email or post using the contact details at the end of this policy.

What is our legal basis for processing?

- Consent; or
- Legitimate Interests.

OTHER USES

- **Internal Analysis:** we may use your personal data to assess our performance as a business and for statistical analysis, as part of our legitimate interest to develop our business and our products;
- **External Feedback:** we may share your data with HMRC as part of a wider performance assessment of their service provision to us as your appointed Tax Agent; and
- **Sale, or re-structuring:** we may share your data with potential buyers of some or all of our business during a sale, or re-structuring and may rely on legitimate interests to transfer ownership of your files with us to a third party.

What is our legal basis for processing?

- Legitimate Interests

LEGAL REQUIREMENTS

We may be required to use your data due to a legal requirement which is placed upon us; this includes our regulatory requirements such as financial record keeping, staff training and monitoring, in addition to complaint handling. We will always inform you if this is the case.

What is our legal basis for processing?

- Legal Obligation.

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

THIRD PARTIES

To allow us to provide our services to you we also utilise other third parties to provide critical functions to our business. Your personal data will always be processed in strict confidence and we will take all reasonable steps to ensure that any third party has adequate security measures in place.

- **Providing our service:** Where you agree for us to process a Tax Refund claim on your behalf, your personal information will be shared with HMRC. You can view HMRC's Privacy Policy here: <https://www.gov.uk/government/publications/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you>
- **Systems and IT:** we use third party providers of IT systems and services, which support the running of our business through providing essential data storage, software, and other IT services;
- **Communicating with you:** we may use third party firms to help us manage and send some of our email and text message (SMS) communications. We may also use an outsourced print house to print and post letters that we send to you;
- **Marketing to you:** we may use media agents, to design, host and manage our advertisements. They are our data processor, which means they only process your data under our contract with them and under our strict instruction. They receive a copy of the data that you have submitted through our website, including your IP address. We and/or our media agents may set cookies on your device in accordance with our Cookie Policy. We may also use third party advertising services which provide analytical information about our advertising to help us improve this in the future. In any event, the data held by analytics firms is on an anonymised basis, meaning they cannot identify you;
- **Analysis and personalisation:** we use third party firms, for analysis and to help personalise our website and communications to ensure customers they are provided with the best experience;
- **Meeting our obligations:** we may use professional legal, consultancy and accountancy services to help us fulfil our regulatory and legal obligations. In certain circumstances we may be required to provide your data to our Regulator, or other relevant body, for example HMRC, the Information Commissioner's Office, or a law enforcement body;
- **Other third parties:** we may share your data with other third parties where we believe we have a legitimate interest to do so, such as tracing agents, review platforms, market researchers, or potential buyers of some or all of our business during a sale, or re-structuring.

If you request for us to stop processing your data, we will also communicate this to the relevant third parties if they are processing this on our behalf. If you have any concerns about the above third parties, please let us know and we can provide advice and support to help you manage your data preferences.

INTERNATIONAL TRANSFERS

We will only share your personal information outside the United Kingdom (UK) where we have your consent, to comply with a legal duty, or where we work with a third-party service provider to enable us to provide you with our services, and they are based in or process information outside of the UK.

If we do share your information outside of the UK, we will make sure that it is protected in the same way as if it was being used within the UK.

This includes through ensuring that the European Commission has made an 'adequacy decision' in respect of the country's data protection measures. Although we are no longer part of the European Union (EU) the UK Government has recognised European Commission adequacy decisions made before the end of the transition period, meaning we are able to continue to transfer data to the European Economic Area (EEA) and other countries with a European Commission adequacy decision in confidence. More information on this can be found on the European Commission Justice website or the Information Commissioner's Office website.

Where we transfer data to, or through a country the European Commission has not made an adequacy decision about, we will ensure that the transfer is covered by other appropriate safeguards including Standard Contractual Clauses, and organisational and technical security measures.

In addition, some of the third party service providers we use may be based outside of the UK or EEA and/or may provide services which mean your data is transferred outside of the EEA.

In any case, we ensure that there are appropriate security measures in place such as technical security, including encryption and restricted access to your data. We have strict contracts in place to make sure your data is kept safe. If you have any questions, please contact us.

OUR LEGITIMATE INTERESTS

Where we have mentioned in this policy that our use of your personal data is based on our "legitimate interests", these are:

- to service our customers' needs and deliver services;
- to promote and market our products and services;
- to understand customers including their patterns, behaviours as well as their likes and dislikes; and
- to test and develop new products and services as well as improve existing ones. When we rely on our legitimate interest, we make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data.

HOW LONG WE USE PERSONAL DATA FOR

We will only hold your personal information on our systems for the period necessary to fulfil the purposes outlined in this Privacy Policy or until you request it is deleted (unless a longer retention period is required or permitted by law).

Generally, you can expect us to keep your personal information while you use our services or if you have an active account with us. Where you have utilised our Tax Refund claim services we will need to keep your personal information for four years from the date that most recent contract with you concluded, to meet our legal and regulatory obligations.

YOUR DATA RIGHTS

You remain in control of your personal information and have rights over the personal information we hold, we summarise some of these rights below. You can make a request to exercise your rights by post or email. If you make the request by email, we will provide any response or information in a commonly used electronic format unless you instruct us otherwise. Where you make a request to exercise one of your rights, we will action this within one month. However, should the request be complex we can extend this by a further two months.

ACCESSING YOUR PERSONAL INFORMATION

You have the right to request from us a copy of the personal data that we may hold about you. This is often called a 'Data Subject Access Request'. We will provide this free of charge. However, if you make a repeat request, we may charge an administrative fee of £10.

Before providing this information to you or to another person or company, we may ask for proof of identity or ask sufficient questions to enable us to locate the information and ensure that we are only providing it where you have given your agreement.

CORRECTING YOUR PERSONAL DATA

If the personal information we hold about you is incorrect, or incomplete you have the right to request that we correct this.

STOPPING, OR LIMITING THE PROCESSING OF YOUR PERSONAL DATA

You may request that we stop processing your data, for a specific purpose or any purpose if you believe we are no longer entitled to process it. There may be occasions where we are unable to stop processing your personal data and we will discuss this with you when responding to your request.

DELETING YOUR PERSONAL DATA

If you believe that we no longer have any reason to process or hold your data, you may request that we delete this. There may be occasions where we are unable to delete your personal data due to contractual, legal, or regulatory obligations. We will, however, discuss this with you when responding to your request.

TRANSFERRING YOUR PERSONAL DATA

You can request your data in a commonly used electronic format, and for us to transfer this to another entity or person, where we are processing your data with your consent or in accordance with a contract. This will only apply to information which is processed by automated means.

POLICY AMENDMENTS

We may update this Privacy Policy from time-to-time by posting a new version on our website. **You should check our website occasionally to ensure you are happy with any changes.**

Where provided electronically, a paper copy of this policy can be made available upon request.

CONTACT US

If you have any questions about this policy or our treatment of your personal data, please contact us:

Address: The Data Controller
Brooksdale Ltd
Magnetic House
Waterfront Quay
Salford
M50 3XW

Email: info@brooksdale.co.uk

Telephone: 0161 751 7295

COMPLAINTS

If you are not happy with how we process your personal information you should contact us, using the contact details provided above, to make a complaint

You also have the right to make a complaint to the Information Commissioner's Office, if you are unhappy with how we have used your data. You can find details of how to make a complaint to the ICO on their website, at: <https://ico.org.uk/make-a-complaint/>

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113