

## **PRIVACY NOTICE**

### **Chanonry Payroll Solutions**

#### **1. Introduction**

- 1.1 Chanonry Payroll Solutions are committed to safeguarding the privacy of individuals. In this policy we explain how we will treat Personal Data processed by us, in accordance with data protection legislation, including the Data Protection Act 2018 and the General Data Protection Regulation ('GDPR').
- 1.2 Personal Data includes any information relating to an identified or identifiable natural person ('Data Subject') who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 1.3 Processing, for the purpose of this Privacy Notice, means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 1.4 Before you disclose to us the Personal Data, Special Category Personal Data or Personal Data relating to criminal convictions and offences of another person, you must obtain that person's consent, or have another lawful basis for such disclosure.

#### **2. Processing Personal Data – Lawful Bases**

- 2.1 We will only process such Personal Data which is adequate, relevant and limited to what is necessary to achieve the purpose of the processing.
- 2.2 We may process Personal Data for the following lawful purposes:
  - (a) Legitimate interests of our organisation. These include debt recovery and the processing of personal data for the purposes of communicating with other businesses and other organisations;
  - (b) Performance of a contract or to enter into pre-contractual negotiations;
  - (c) Compliance with a legal obligation placed on us;
  - (d) To protect the vital interests of either yourself or another person; and/or
  - (e) For other reasons with your consent, which can be withdrawn at any time. Withdrawal of your consent does not affect the lawfulness of processing up to the time of the time of your withdrawal.

### **3. Processing Personal Data – How We Obtain and Collect Personal Data**

3.1 We primarily process Personal Data that our clients and other third parties provide us with.

3.2 We generally obtain Personal Data through third parties, including:

- our clients (e.g. where payroll is outsourced to us);
- public databases (e.g. Companies House and the electoral register);
- private databases (e.g. credit reference agencies)
- government agencies (e.g. HMRC or another governing body, Department for Work and Pensions (DWP), Child Maintenance Service or Child Support Agency (CSA) and courts and tribunals;
- third parties such as pension provide, dental and medical benefit providers, Cycle to Work Scheme provider, childcare voucher provider and other benefit providers; and
- other publicly available sources (e.g. the press and online search engines).

Such data may include names, addresses, dates of birth, National Insurance Numbers, Tax Codes, pay related information (current and historical) banking details, employment status, pension information and contractual information relating to pay e.g. working hours, benefit and rewards. If we obtain any other Personal Data from third party sources, we will tell the party on whose behalf we are processing the Personal Data.

3.3 We may also process the following kinds of Personal Data from your visit to our website:

- (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
- (b) information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address). You can inform us at any time you no longer require our email notifications/newsletter;
- (c) information that you provide to us when using the services on our website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use);
- (d) information contained in, or relating to, any communication that you send to us or send through our website (including the communication content and metadata associated with the communication);
- (e) information necessary so as to provide third parties with statistical information about our users;
- (f) information required so as to deal with enquiries and complaints made by or about you relating to our website;
- (g) information required so as to keep our website secure and prevent fraud;
- (h) information required so as monitor private messages sent through our 'Contact Us' page on our website; and
- (i) any other personal information that you choose to send to us.

#### **4. Processing Special Category Personal Data**

- 4.1 Special Category Personal Data is Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation.
- 4.2 In the event that we need to obtain and process Special Category Personal Data, other than as required by law, we will always tell our clients why, and how the information will be used and obtain our clients' consent for this.

#### **5. Processing Personal Data Relating to Criminal Convictions and Offences**

We do not routinely process any Personal Data of this category. In the event that we do, all processing of Personal Data relating to criminal convictions and offences or related security measures, including Personal Data relating to the commission of offences or proceedings for an offence committed or alleged to have been committed by the Data Subject or the disposal of such proceedings including sentencing, will be processed either by consent or when processing is authorised by law.

#### **6. When, and with whom, will we share Personal Data?**

- 6.1 We may disclose Personal Data to our insurers, professional advisers, agents, suppliers, or subcontractors insofar as reasonably necessary for the purposes set out in this policy.
- 6.2 We may disclose Personal Data:
- (a) to the extent that we are required to do so by law;
  - (b) to protect rights, property, the safety of us, our clients, users of our website or other persons;
  - (c) in connection with any ongoing or prospective legal proceedings;
  - (d) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
  - (e) to the purchaser (or prospective purchaser) of any business; or asset that we are (or are contemplating) selling; and/or
  - (f) to another organisation if we enter into a joint venture or merge with another organisation.
- 6.3 Additionally, where payroll is outsourced to us, we may disclose Personal Data and Special Category Personal Data to our clients (regarding their respective employees), to government agencies (e.g. HMRC or another governing body, Department for Work and Pensions (DWP), Child Maintenance Service or Child Support Agency (CSA) and courts and tribunals; third parties such as pension providers, dental and medical benefit providers, Cycle to Work Scheme provider, childcare voucher provider and other benefit providers.
- 6.4 Except as provided in this policy, we will not provide Personal Data to third parties without first obtaining Data Subject's consent.
- 6.5 If we wish to pass Special Category Personal Data or Personal Data Relating

to Criminal Convictions and Offences on to a third party other than provided for in paragraph 6.1 above, we will only do so once we have obtained our clients' explicit consent, unless we are required to do so by law.

- 6.6 Any third party who we share Data Subject's Personal Data with are obliged to keep the details securely and when no longer needed, to dispose of them securely or to return the Personal Data to us.

## **7. For how long will we keep Personal Data?**

- 7.1 Personal Data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 7.2 Unless we advise otherwise, we will retain Personal Data in accordance with our retention periods. We determine retention periods for Personal Data based on legal requirements and best practice.

## **8. How we ensure Personal Data is kept securely**

- 8.1 We will take reasonable organisational and technical precautions to prevent the loss, misuse or alteration of personal information.
- 8.2 We will store all the personal information provided on our secure servers.
- 8.3 Transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

## **9. Data Subjects' Rights**

Data Subjects have the following rights regarding the Personal Data which we hold:

- 9.1 right of access – the right to request a copy of the information that we hold about the Data Subject, and to whom it has been disclosed;
- 9.2 right of rectification – a right to correct Personal Data that we hold about the Data Subject that they think is inaccurate or incomplete;
- 9.3 right to erasure ('right to be forgotten') – in certain circumstances the Data Subject can ask for the Personal Data which we hold about them to be erased from our records;
- 9.4 right to restriction of processing – in certain circumstances Data Subjects have a right to restrict the processing of Personal Data;
- 9.5 right to data portability – Data Subjects have a right to have the Personal Data we hold about them provided to them in a machine-readable format, and the right to have that transferred to another organisation;
- 9.6 right to object – Data Subjects have the right to object to direct marketing, which is an absolute right to object and cannot be refused; and
- 9.7 right to object – Data Subjects have the right to object to processing which is

based on the legitimate interests of Chanonry Payroll Solutions. Such objections will be assessed on their respective legal merits.

## **10. What if Data Subjects are not happy?**

- 10.1 In the event that we refuse a request to exercise any Data Subject rights, we will always provide a reason why we have reached that decision.
- 10.2 If a Data Subject wishes to make a complaint about how Personal Data is being processed by us, or any third party on our behalf, we would be grateful if they would, in the first instance, contact Hayley Mudge, using the contact details provided in paragraph 15 below, who will endeavour to resolve the issue to the Data Subject's satisfaction.
- 10.3 A Data Subject also have the right to complain directly to the Information Commissioner's Office and seek other legal remedies.

## **11. Links to other websites**

- 11.1 Our website may include hyperlinks to, and details of, third party websites.
- 11.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **12. Updating Personal Data**

Please let us know if any Data Subject's details change, need to be corrected or updated. We will then be able to change our records, we cannot do so unless we are notified of any alterations. You can contact us by post, email or telephone using the contact details provided in paragraph 15 below.

## **13. Transfers of Personal Data to a Country outside of the UK, EU or EEA**

If we need to transfer Personal Data for processing to a country outside of the UK, EU or EEA, we will generally only do so where:

- (a) the European Commission have taken an adequacy decision in respect of the country;
- (b) lawful binding corporate rules are in place;
- (c) lawful model contract clauses are in place;
- (d) we have obtained specific consent to the proposed transfer, and advised of the possible risks of such transfers;
- (e) the transfer is necessary for the performance of a contract, or are part of the implementation of pre-contractual measures;
- (f) the transfer is necessary for the conclusion or performance of a contract concluded in the interests of the Data Subjects, and us, and another party;
- (g) the transfer is necessary for important reasons of public interest;
- (h) the transfer is necessary for the establishment, exercise or defence of legal claims; and/ or
- (i) the transfer is necessary in order to protect the vital interests of the Data Subjects or others, where the Data Subjects are physically or legally

incapable of giving legal consent.

## **14. Cookies**

14.1 Our website uses cookies.

14.2 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

14.3 Cookies may be either “persistent” cookies or “session” cookies. A persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

14.4 We use persistent and session cookies on our website.

14.5 Most browsers allow you to refuse to accept cookies. Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you may not be able to use all the features on our website. You can delete cookies already stored on your computer.

14.6 We also use Google Analytics on our website.

## **15. Contact Us**

15.1 You can contact us:

- (a) by post, at 4 Mario Place, Fortrose, Ross-shire, IV10 8RR;
- (b) using our website contact form ([www.chanonrypayroll.co.uk](http://www.chanonrypayroll.co.uk));
- (c) by telephone on 01381 621 779 and 07734 322 909; and/or
- (d) by email [info@chanonrypayroll.co.uk](mailto:info@chanonrypayroll.co.uk).

15.4 Any queries relating to data protection can be referred to Hayley Mudge.

## **16. How we will notify you of any changes to our Privacy Notice**

16.1 We may update this policy from time to time by publishing a new version on our website.

16.2 Please check this page occasionally to ensure that you are happy with any changes to this policy.

16.3 We may also notify you of changes to this policy, by email or through the private messaging system on our website.

This Policy is generally available to clients/customers and third parties on our website. If a hard copy or email version of this policy is required by any person, it will be sent to them without delay.

<b>Document Details</b>	
Date of Approval	17 Feb 2025
Approved by	Hayley Paterson
Date for next review	17 Feb 2028
Version Number	2019/03

