

## Client privacy notice

This privacy notice tells you how we look after your personal data when you visit our website or become our client. It explains what personal data we collect about you, what we use it for and who we share it with. It also explains your rights and what to do if you have any concerns.

**Who we are** Arcos Tax Advisory Services Limited is the controller for your personal data, which means that we're responsible for how we collect and use any information that does, or could be used to, identify you.

Our registered office is: 1<sup>st</sup> Floor, Senator House, 85 Queen Victoria Street, London, EC4V 4AB. We are registered with the Information Commissioner's Office (**ICO**), which regulates compliance with data protection law in the UK, under number ZA924876.

### What personal data we collect

When you interact with our website, we collect or create:



**your name and email address** if you subscribe to our newsletter



**technical data about the device you used to access our website** which we obtain through server logs and the use of cookies and similar technologies (see below), including the internet protocol (IP) address of the device and characteristics of such device



**usage data about your visit**, which we obtain through server logs and the use of cookies and similar technologies (see below), including the pages viewed by you, how you moved about our website and how you interacted with particular pages

When you become our client, we collect or create:



**identity information** – name, date of birth, nationality, gender, marital status, passport number, visa details



**contact details** – home and work address, email address, telephone numbers, social media profile



**financial details** – your tax code, tax returns, national insurance number, social security number, bank account details, information relating to your assets, investments and personal finances



**profile information** – your interests, preferences, feedback



**marketing** – record of whether you do or do not want to receive marketing from us

### **Sensitive Personal Data**

Anti-Money Laundering checks may include criminal offence data and ethnic origin (which may be inferred from passport details). Information relating to Politically Exposed Persons may involve information about their political opinions.

Otherwise, we do not intend to intentionally collect sensitive data; however, it may be sometimes inferred from the personal data received (e.g. health data by disability payments or reasonable adjustment measures, sexual orientation by marital status).

### **How we use your personal data**

- to provide our tax advice services to you
- to submit tax returns to the relevant tax authority
- to perform mandatory anti-money laundering checks
- to comply with regulatory and legal obligations
- to tailor our communications (and provide better customer service to you)
- where you've subscribed to our mailing list, to send you our email newsletter and other communications
- to administer and protect our website through security monitoring, reporting and testing
- where you've accepted advertising cookies, delivering relevant content and advertisements through LinkedIn and understanding the effectiveness of such adverts
- to improve and optimise our service, website and marketing

### **Who we share your personal data with**

- **our staff** (which may include self-employed consultants)
- **our supply chain** (other organisations that help us provide our services. We ensure these organisations only have access to the information required to provide the support we use them for, and have a contract with them that contains confidentiality and data protection obligations)
- **our technical service providers** (e.g. our cloud service providers that host our business systems)
- **regulatory authorities**
- **our professional advisers** (e.g. the accountants or legal advisors we sometimes use to help us conduct our business)
- **other professional advisors** (e.g. tax practitioners qualified in foreign jurisdictions)
- **any actual or potential buyer of our business**

If we are asked to provide personal data in response to a court order or legal request (e.g., from the policy), we would seek legal advice before disclosing any information and carefully consider the impact on your rights when giving a response.

### **International Transfers**

We are based in the UK, which is also where we store your personal data.

We may need to make your personal data accessible to our supply chain outside the UK to provide our services. We will only allow your personal data to be accessed outside the UK where we have a valid legal mechanism in place (e.g. by using the International Data Transfer Agreement or other contract approved by the UK Secretary of State).

- Lawful basis** Data protection law requires us to identify [a legal justification](#) whenever we collect or use your personal data. These are the lawful basis that we rely on when we use your personal data:
- to enter into and perform our **contract** with you
  - to comply with a **legal obligation** that we have
  - to pursue our **legitimate interests** (our justifiable business aims) but only if those interests are not outweighed by your other rights and freedoms (for example, your right to privacy) – the legitimate interests we rely on are set out above under “How we use your personal data”
  - to do something that you have given your **consent** for

**How does our website use cookies?** Cookies are small text files which are stored on your device when you access and use certain features of our website. Apart from those cookies which are strictly necessary, we only store cookies on your device if you’ve consented to this when you first access our website and every time thereafter.

As cookies are unique, we can use them to distinguish you from other users, however we have configured our analytical cookies so that your IP address is anonymised.

To find out more about cookies, how to refuse them and how to change your device’s cookie settings, you should read the [ICO Cookie Guidance](#).

Our website uses the following cookies:

**Necessary Cookies:**

Cookie Name	Expiry	Notes
elementor	persistent	Used in context with the website’s WordPress theme. The cookie allows the website owner to implement or change the website’s content in real-time
rc::a	persistent	Google Maps – this cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website

rc::C	session	Google Maps – This cookie is used to distinguish between humans and bots
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#### **Statistical Cookies:**

Cookie Name	Expiry	Notes
_ga	2 months	Registers a unique ID that is used to generate statistical data on how the visitor uses the website
_ga_#	2 months	Used by Google Analytics to collect data on the number of times a user has visited the website as well as dates for the first and most recent visit

#### **How long we keep your personal data**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

If you are not a client and you browse our website, we keep personal data collected through our analytics tools for 2 months.

If you are not a client and you have asked for information from us or you have subscribed to our mailing list, we keep your details until you ask us to stop contacting you.

If you are a client, we keep your personal data for 7 years from the date that you cease to be our client.

For a list of all retention periods please email [info@arcostax.com](mailto:info@arcostax.com)

#### **Your rights**



**Access:** You must be told if your personal data is being used and you can ask for a copy of your personal data as well as information about how we are using it to make sure we are abiding by the law



**Correction:** You can ask us to correct your personal data if it is inaccurate or incomplete. We might need to verify the new information before we make any changes.



**Deletion:** You can ask us to delete or remove your personal data if there is no good reason for us to continuing holding it or if you have asked us to stop using it (see below). If we think there is a good reason to keep the information you have asked us to delete (e.g. to comply with regulatory requirements), we will let you know and explain our decision.



**Restriction:** You can ask us to restrict how we use your personal data and temporarily limit the way we use it (e.g. whilst you check that the personal data we hold for you is correct)



**Objection:** You can object to us using your personal data if you want us to stop using it. We always comply with your request if you ask us to stop sending you marketing communications but in other cases, we decide whether we will continue. If we think there is a good reason for us to keep using the information, we will let you know and explain our decision.



**Portability:** You can ask us to send you or another organisation an electronic copy of your personal data



**Complaints:** If you are unhappy with the way we collect and use your personal data, you can complain to the ICO but we hope we can help in the first instance. If you have any concerns you can email us at [info@arcostax.com](mailto:info@arcostax.com)

If you want to make any of the right requests above, you can reach us at [info@arcostax.com](mailto:info@arcostax.com).

It is usually free for you to exercise your rights and we aim to respond within one month.

It might take us longer to deal with more complicated requests or where multiple requests are made at the same time, but we will always let you know first and will only ever extend the deadline by a maximum of two months.

The only time we charge a fee or refuse to respond is if we feel the request is unfounded or excessive, but we will always let you know and explain our decision.