Albert Goodman

DATA PRIVACY POLICY

1. Introduction and important information

1.1. The privacy of your personal information is very important to us. Albert Goodman Audit LLP ("we", "us" or "our") is committed to protecting and respecting your personal data and privacy.

1.2. This policy applies to the processing of personal data by Albert Goodman Audit LLP. The other associated entities that operate under Albert Goodman brand, including Albert Goodman Financial Planning Limited and Albert Goodman LLP, will be covered by separate privacy notices where they process personal data.

1.3. This Privacy Policy explains how we use and collect personal data from you when you engage with us to provide professional services, access our website, or otherwise engage with us (such as opting into direct marketing or attending an event, for example). It also relates to our use of any personal information you provide to us by telephone (including SMS), in written correspondence (including letter and email) and in person.

1.4. Please note that:

a) our services and our website are not intended for children under the age of 18 and we do not proactively collect data relating to children; and

b) our website and services may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

1.5. Whenever you provide personal data, we are legally obliged to use your information in line with all applicable laws concerning the protection of such information; including but not limited to the Data Protection Act 2018, the General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025 described in this policy as the "Data Protection Laws".

1.6. This Privacy Policy also forms part of our terms of business and is not intended to override them. This policy may be amended or updated from time to time and any revisions will be included to the version of the policy on our website, so please check back regularly. Alternatively, we can provide our most up-to-date Privacy Policy to you upon request.

2. Who are we?

2.1. For the purpose of the Data Protection Laws, the data controller is Albert Goodman Audit LLP. We are a private limited liability partnership registered in England and Wales under registered number OC455317. Our registered office is at Goodwood House, Blackbrook Park Avenue, Taunton, Somerset, United Kingdom, TA1 2PX.

Albert Goodman Audit LLP is a limited liability partnership registered in England and Wales No. OC 455317.
A complete list of the firm's principals can be obtained from Companies House and is included on the firm's website.
Registered Office: Goodwood House, Blackbrook Park Avenue, Taunton, Somerset, United Kingdom, TA1 2PX
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3. Who can you contact for privacy questions or concerns?

3.1. If you want to request more information about our Privacy Policy or information regarding data protection you should contact us using the details provided below:

FAO: Dawn Baker ('Data Protection Officer'), Goodwood House, Blackbrook Park Avenue, Taunton, Somerset TA1 2PX
Email: gdpr@albertgoodman.co.uk

Telephone: 01823 286096 and ask to speak to the Data Protection Officer.

3.2. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

4. What information do we collect about you?

4.1. We collect and process personal data. Typically, the personal data we collect and process will include identity, contract, transactional, technical, profile, usage and marketing and communications data, including but not limited to:

a) Identity Data includes first name, last name, title or other identifier (such as job title), marital status, date of birth, gender and images.

b) Contact Data includes billing address, email addresses and telephone numbers.

c) Transaction Data includes details about services you have engaged us to provide or your visits to our premises.

d) Financial Data includes pay records, bank account details, information about your wealth, assets, credit position, the products you have invested in, tax residency, details of any payments you make or receive, household income, employment status and details of your business interests. This includes information about the source of your wealth and source of funds.

e) Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website. This also includes some personal data when you engage with us on social media.

f) Profile Data includes your username and password, purchases or orders made by you, your interests, preferences (including details about your personal likes and dislikes as identified during your visits to our premises), feedback and survey responses.

g) Usage Data includes information about how you use our website, products and services.

h) Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

i) CCTV Data includes data (including but not limited to images, video and sound) gathered by Closed Circuit Television and other surveillance technologies installed at our premises.

Please note that we may collect and/or process other personal data from time to time.

4.2. We also collect, use and share aggregated data, such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data, but is not considered to be personal data in law as it will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate a percentage of users accessing a specific feature of our services. However, if we combine or connect your aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used solely in accordance with this policy.

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4.3. In certain circumstances, we may collect Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

4.4. We only collect data from you directly or via third parties (see section 5 below).

4.5. Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the services that you have engaged us for or are looking to engage us for. In this case, we may have to terminate all or part of the contracted services that we are providing, but we will notify you if this is the case at the time.

5. How do we collect your personal data?

5.1. We use different methods to collect data from and about you including through:

a) Your interactions with us. You may give us your personal data by filling in forms or by corresponding with us by post, phone, messaging service, email or otherwise. This includes personal data you provide when:

- you or your employer engages us to provide professional services, and also during the provision of those services;
- you request a proposal from us in respect of the services we provide;
- you contact us by email, telephone, post or social media (for example, you submit an enquiry about our services);
- you create an account on our website;
- you provide us with contact details at an event;
- it is made available from third parties and/or public resources (for example, from your employer or from Companies House);
- you request marketing to be sent to you;
- you enter a promotion or survey; or
- you give us feedback or contact us.

b) Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.

c) Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
  - advertising networks; and
  - search information providers.
- Contact, Financial and Transaction Data from providers of technical, or payment services.
- Identity and Contact Data from aggregators, including trade organisations or exhibition organisers.
- Identity and Contact Data from publicly available sources such as Companies House.

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6. How will we use the information we collect about you?

6.1. We use information held about you to:

a) Perform a contract between you and us and provide our services, including any precontractual steps (sending a proposal, answering enquiries etc.);

b) provide you with marketing materials;

c) facilitate professional referrals;

d) carry out feedback and research on our services;

e) notify you about changes to our services; and

f) any other processing which may be required by UK law from time to time.

6.2. We share your data with third parties where there is a legal obligation for us to do so or we have identified a valid lawful basis as set out in the table below (please also see clause 6 below). We may process your personal data without your knowledge or consent where this is required or permitted by law.

6.3. We have set out below in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
To register you as a new client.	Identity Contact Profile	Performance of a contract with you
To provide our services to you and to process related transactions, including: Precontractual actions (sending a proposal, responding to enquires etc.) Manage payments, fees and charges Collect and recover money owed to us	Identity Contact Transaction Usage Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: Notifying you about changes to our terms or privacy policy Asking you to leave a review or take a survey Dealing with your requests, complaints and queries	Identity Contact Profile Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how clients use our products/services)

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To keep our employees, customers, guests and contractors secure.	CCTV Usage	Necessary for our legitimate interests (to ensure our property is secure and fit for use and ensure the wellbeing of employees, customers, guests and contractors while at the property.
To record incidents and accidents occurring at the Property.	Identity Contact Usage Health (Special Category Data)	Necessary to comply with a legal obligation (health and safety) We may also use this information to exercise and defend our legal rights and may be required by law to process this information.
To enable you to partake in a competition or complete a survey	Identity Contact Profile Usage Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business).
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Identity Contact Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with a legal obligation
To measure or understand the effectiveness of the advertising we serve to you	Identity Contact Profile Usage Marketing and Communications Technical	Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical Usage Profile	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity Contact Technical Usage Profile Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

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e: enquiries@albertgoodman.co.uk
albertgoodman.co.uk

ICAEW CHARTERED ACCOUNTANTS
PRAXITY™ Empowering Business Globally
FOREST CARBON
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Creating UK forests, compensating CO2

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7. What lawful reasons do we have for processing personal data?

7.1. We only process your data (which may include providing it to a third party) where we have identified a valid lawful basis to do so. These are as follows:

a) Contractual obligation – We may process personal data that is necessary to comply with our obligations arising out of a contract, for example, where you have engaged with us to provide professional, we will use the personal data you provide to fulfil our contractual obligations.

b) Legitimate Interest – We may rely on legitimate interests based on our evaluation that the processing is fair, reasonable and balanced, and in the interests of conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. 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 for our legitimate interests. Where we use legitimate interests, we will record our decision on making this decision. We rely on legitimate interest where processing of the data we hold on you does not, in our opinion, affect your rights or freedoms and is proportionate to our interests e.g. keeping you up to date with our latest services or obtaining your feedback on our service.

c) Consent – We will seek to obtain your consent to process:

- your data outside our contractual obligations (see above) unless we have identified a Legitimate Interest (see above); and
- any special category data.

d) Legal obligation – We may process your data where we it is necessary for us to do so to comply with the law.

7.2. We may also use your personal data in the following circumstances, which are likely to be rare:

a) Vital Interests - We may process personal data to protect the vital interests of the individual or another natural person; or

b) Public Task - We may process personal data in order to perform a specific task in the public interest or in the exercise of official authority vested in us.

8. Do we share personal data with third parties?

8.1. We will keep your information within the organisation except where disclosure is required or permitted by law or when we use third party service providers (data processors) to supply and support our services to you. We have contracts in place with our data processors. This means that they cannot do anything with your personal data unless we have instructed them to do so. They will not share your personal data with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

8.2. Please see below the list which sets out the categories of service providers that may receive your personal data:

a) IT support services

b) Email provider

c) Website provider

d) Secure document disposal service

e) Banks

f) Online payment providers

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g) Insurers

h) Solicitors

i) Cloud-based software providers

j) Feedback aggregators and collectors

k) Couriers

l) Marketing Agencies

m) Fraud prevention agencies

n) Law enforcement bodies

o) Credit reference agencies

8.3. We may share your personal data with other associated entities that operate under Albert Goodman brand, where this is necessary for to provide, administer, support and improve our services, manage our business, meet our legal and regulatory obligations and ensure appropriate governance and oversight. Where personal data is shared within the group, the relevant group entity will process that personal data in accordance with Data Protection Legislation and only where there is a lawful basis for doing so.

8.4. We never sell your data to third parties or allow third parties to contact you without your permission.

8.5. We may disclose your personal data to other third parties in the context of a possible sale, merger, restructuring or financing, or investment scenario. In this event we will take appropriate measures to ensure that the security of your personal data continues to meet our high standards.

9. How do we use your personal data for marketing purposes?

9.1. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on whether we think you may want or need additional services, or if we believe that a topic might be of interest to you, e.g. changes in accounting regulations. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

9.2. You will receive marketing communications from us if you have requested information from us or engaged us to provide services to us, and you have not opted out of receiving that marketing.

9.3. We strive to provide you with choices regarding certain personal data uses, namely around marketing and advertising. In particular:

a) We will always obtain your express opt-in consent before we share your personal data with any third party for marketing purposes; and

b) You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out or unsubscribe links on any marketing message sent to you or by contacting us at any time.

10. Do we transfer your personal data outside the UK

10.1. Your data is stored by us in the UK. However, several of our external third parties (data processors) are based outside of the UK, including in the European Economic Area.

10.2. Whenever we transfer your personal data to the EEA, we ensure a similar degree of protection is afforded to it by ensuring we only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.

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10.3. Whenever we transfer your personal data to countries outside of the UK and EEA, where we use certain service providers (see clause 8.2), we will rely on an appropriate international data transfer mechanism approved by the UK regulatory authority, the Information Commissioner's Office.

10.4. Please contact us using the details provided in clause 2.1 for further information on the specific international data transfer mechanisms that we rely on when sending personal data outside of the UK.

11. What about personal data security?

11.1. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

11.2. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

12. How long do we retain personal data?

12.1. We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

12.2. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

12.3. By law we have to keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for 6 years after they cease being clients.

12.4. In some circumstances you can ask us to delete your data (see below for further information).

12.5. We may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you. Please see clause 3.2.

13. What are your data protection rights?

13.1. Under the data protection laws your rights are:

a) To be informed – We must make this Privacy Policy available to you and be transparent over how we process your data.

b) Access – You are entitled to know what details we hold about you and why. We strive to be as open as we can be in terms of giving people access to their personal data. You can find out if we hold any of their personal data by making a formal request under the data protection laws. Such requests should be made using the contact details provided in this policy. If we do not hold information about you we will confirm this in writing at the earliest opportunity. If we do hold your personal data we will respond in writing. Our response will:

- confirm that your data is being processed;
- verify the lawfulness and the purpose of the processing;

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- confirm the categories of personal data being processed;
- confirm the type of recipient to whom the personal data have been or will be disclosed; and
- let you have a copy of the data in format we deem suitable or as reasonably required by you.

c) Rectification – We are obliged to correct or update your details. We will correct or update your data without delay provided you make the request in writing to the contact details provided in this policy, clearly specifying which data is incorrect or out of date.

d) Erasure – This is also known as the right to be forgotten. Under Data Protection Laws you have the right to require us to erase your personal data under specific circumstances. A request for your personal data to be deleted will be decided on a case by case basis and should be submitted in writing to the contact details provided in this policy.

e) Restrict processing – You have the right to 'block' or suppress the processing by us of your personal data.

f) Data portability – You have the right to obtain the personal data that you have provided to us in a commonly used machine-readable format and reuse it with a different provider.

g) Right to object – You have the right to object to us processing your data in certain circumstances. You have an absolute right to stop your data being used for direct marketing, but in other circumstances we may still be allowed (or required) to process your personal data if we can show you that we have a compelling reason for doing so.

h) Rights in relation to automated decision making and profiling – We do not use automatic decision making or profiling.

i) Right to withdraw consent - Where you have given us consent to process your personal data, you can withdraw that consent at any time either by contacting us using the details set out in this policy, or by following the opt-out links in electronic messages where relevant. We do not penalise individuals who wish to withdraw consent and we act on withdrawals of consent as soon as we can.

j) Right to complain – you have the right to raise a complaint with us in relation to how we handle your personal data. We are obligated by the Data (Use and Access) Act 2025 to acknowledge your complaint within thirty (30) days and provide a comprehensive response without undue delay. As set out in our Standard Terms of Business, we will endeavour to handle complaints in relation to the handling of your personal data, in accordance with our usual complaints procedure.

13.2. Please note that you may need to provide identification in order to prove who you are if you wish to invoke any of your rights as provided by the data protection laws and as summarised above.

13.3. If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

14. Applications to work for us

14.1. If you apply to work for us (directly or indirectly) in any role we may receive data about you from third parties. In addition, we will keep the details of your application and any additional information provided to us by you or others during your application so that we can keep you informed of future opportunities that you may be interested in. If you do not wish for us to keep your details for this reason, please let us know by contacting us using the details provided in this policy.

15. Changes to the Privacy Policy

15.1. We keep our Privacy Policy under regular review. This version was last updated on 1 November 2026.

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