

Overview

This Privacy Policy is designed to help you understand what Personal Information we collect, why we collect it, how we use it and who we share it with. It also explains the rights you have in connection with your Personal Information, including how to contact us or make a complaint.

This Policy applies to Achisomoch Aid Company Ltd (AAC), who we also refer to throughout as "we", "us" or "our." See below for our Contact Information.

AAC is registered as a data controller with the Information Commissioner's Office, which is the UK's independent body set up to uphold information rights. As a data controller we are responsible for ensuring that when we process Personal Information we comply with EU and UK data protection law and use it in accordance with our client's instructions.

If you have any questions about this Privacy Policy, please be touch with your usual AAC contact or see below for our Contact Notice.

This Privacy Policy may be altered from time to time and particularly in response to guidance and best practice advice issued by the Information Commissioner's Office with regards to the change in data protection law in the UK on 25 May 2018. We will inform you of changes via our website and if you are a client we will inform you of any key changes in writing. This Privacy Policy was last updated on 8 May 2018.

Glossary of key terms used in this Privacy Policy;

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| We, us, our | Achisomoch Aid Company Ltd, Registered address: New Burlington House, 1075 Finchley Road, London, NW11 0PU |
| Data Protection Officer | Mark Katz |
| Our Services | Our service provision to our clients as outlined within our Terms and Conditions |
| Personal Information | Also referred to as 'personal data' and means information about a living person by which that person can be identified. Some of that information will identify the individual directly, for example by giving their name and email address. It may also be possible to identify someone indirectly, from information in which their name is not given, for example by naming their job title and employer, or by using another form of identifier such as their IP address. See below in "what Personal Information do we collect and use?" for examples of the type of information which would fall within this definition. |
| Special Category Personal Information | Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership. Genetic and biometric data. Data concerning health, sex life or sexual orientation. |
| Website | The website at this address: www.achisomoch.org |

What Personal Information do we collect and use?

The type of Personal Information we collect and process depends on our relationship with you and the context in which we obtain and use it. The information below sets out the Personal Information we will or may collect depending on the circumstances.

Personal Information we may collect;

- 1** Your name, address and telephone number;
- 2** Information to enable us to check and verify your identity, e.g. your date of birth and passport details;
- 3** Electronic contact details, e.g. your email address and mobile phone number;
- 4** Information relating to Our Services;
- 5** Information about your use of our IT, communication and other systems, and other monitoring information, e.g. if you use our secure online client portals.

Further personal Information we may collect depending on our relationship with you.

If you are a business client:

- 1** Director & shareholder names, dates of birth and addresses;
- 2** Information provided by you about yourself or other individuals in connection with the provision of Our Services.

If you are an individual:

- 1** Your tax details;
- 2** Your bank and/or building society details;
- 3** Your nationality and immigration status and information from related documents, such as your passport or other identification, and immigration information.

If you are a Charity:

- 1** Trustee names, dates of birth and addresses;
- 2** Information provided by you about yourself or other individuals in connection with the provision of Our Services.

How Personal Information is collected and your responsibilities:

We will collect Personal Information from you in person, via telephone or email communication from your initial enquiry about Our Services and throughout the ongoing provision of Our Services. This may be in person, via telephone, email or via our Website (see - Visitors to our Website) and secure online client portal.

Third parties may pass Personal Information to us to use in the course of providing Our Services. The processing of this Personal Information may be necessary for the provision of Our Services.

The sources we may also collect Personal Information from include:

- publicly accessible sources, e.g. Companies House, sanctions screening providers, etc.;
- direct from a third party, e.g. from a client or charity;
- a third party with your consent, e.g. your solicitors, accountants, and other professionals we may engage with in provision of Our Services;
- our information technology systems, e.g., case management, document management our Website;
- automated monitoring of our Website and other technical systems, such as our computer networks and connections, communications systems, email, voicemail and instant messaging systems.

When we provide Our Services to you, we may hold and use Personal Information about you. When you provide Personal Information to us relating to a third party, you confirm that you have any necessary permission or authority to do so. You are also responsible for ensuring that the provision of that Personal Information complies with data protection and other applicable law. You must have the authority to disclose personal data if it relates to someone else and all data disclosed should be complete, accurate and up to date.

Visitors to our website

We use Google Analytics to collect statistical information about the number of visitors to our Website. This information includes, pages visited and content searched. Further information can be obtained from the Google Privacy Policy . We use this information to maintain and improve our Website and the services we provide and to analyse and understand what is of interest to our Website visitors, so we can improve and tailor the content and this data will not directly or indirectly reveal your identity.

We use technology to track the patterns of behaviour of visitors to our Website. This can include using a "cookie" which would be stored on your browser or the hard drive of your computing device.

Our Website is not intended for children and, other than in connection with work experience applicants we do not knowingly collect data relating to children via the Website.

How and why we use your Personal Information

Under data protection law, we can only use your Personal Information if we have a proper reason for doing so, for example:

- to comply with our legal and regulatory obligations;
- for our legitimate interests (see below) or those of a third party;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- you have given consent.

A legitimate interest is when we have a business or commercial reason to use your Personal Information, so long as this is not overridden by your own rights and interests. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights, before we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

In general terms we will collect Personal Information to:

- provide our services to you, to manage our relationship and comply with our legal obligations arising from it;
- provide you with information about our business and the services we offer including relevant communications;
- help us improve our business and the services we offer.

This does not apply to any Special Category Personal Information which you may have provided to us or authorised us to obtain from a third party, and which we will usually only process with your explicit consent. However, in some circumstances in connection with Our Services we may receive Special Category Personal Information from yourself or third parties and we can lawfully process it without your consent where it is necessary in the course of us providing you with Our services.

Change of purpose

We will only use your Personal Information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may process your Personal Information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Marketing communications

Where you have requested that we do so, we may use your Personal Information to send you updates (by email, telephone or post) that might be of interest to you and/or information about our services, including new services.

We will always treat your Personal Information with the utmost respect and, other than within AAC, we will never sell or share it with other organisations for marketing purposes.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us by via our website, email or by telephone +44 (0) 208 731 8988
- using the 'unsubscribe' link in our emails.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

Who we share your Personal Information with

We share Personal Information with:

- other third parties where necessary to carry out your instructions;
- our bank/s, foreign exchange partners, or other professional advisors (such as compliance advisors);
- external service suppliers, representatives and agents that we use to make our business more efficient.

Our IT support and service providers may also access your Personal Information as a consequence of them providing support to us.

We only allow our service providers to handle your Personal Information if we are satisfied they take appropriate measures to protect your Personal Information. We also impose contractual obligations on service providers to ensure they can only use your Personal Information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some Personal Information with other parties. For example, if we, in the course of our own business operations, sell or buy any business or assets we may disclose Personal Information held by us to the prospective seller or buyer of those businesses or assets.

Where possible, information will be anonymised but the recipient of the information will be bound by confidentiality obligations. If we are acquired, or substantially all of our assets are acquired, by a third party (or are subject to a reorganisation), Personal Information held by us will be one of the assets which is transferred.

Where your Personal Information is held

Information may be held at our offices, third party agencies, service providers, representatives and agents as described above (see Who we share your Personal Information with).

We also hold your Personal Information in secure data centers in the UK (and in relation to personal data held in our client relationship management system only, in secure data centers in the UK, EU, USA and Israel) with all reasonable technological and operational measures put in place to safeguard it from unauthorised access.

For more information, including on how we safeguard your Personal Information when this occurs, see below Transferring your Personal Information out of the EEA and How we protect your personal information.

Transferring your Personal Information out of the EEA

To deliver services to you, it is necessary for us to share your Personal Information outside the European Economic Area (EEA), e.g.:

- with offices outside the EEA;
- with your and our service providers located outside the EEA;
- if you are based outside the EEA;
- where there is an international dimension to the Services in which we are advising you;
- if one of our staff or contractors needs to access it remotely while they are travelling outside the EEA.

These transfers are subject to special rules under European and UK data protection law. In those circumstances, we undertake an assessment of the level of protection in light of the circumstances surrounding the transfer. We will make sure that any transfers are not repetitive and only limited to the minimum amount of information possible and will always take steps to ensure that your Personal Information is adequately protected. In certain circumstances we may need to seek your consent unless there is an overriding legal need to transfer the Personal Information.

Our current IT support is provided from across the world and when support is provided remotely, your Personal Data may be accessed from and therefore transferred to that country. One of the countries to which we may transfer Personal Information in connection with IT support is the United States; this has been assessed by the European Commission as providing an adequate level of protection for Personal Information. We may also receive IT support from South Africa and Australia and these do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all Personal Information will be secure.

How long your Personal Information will be kept

We will only retain your personal information 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.

When it is no longer necessary to retain your Personal Information, we will delete or anonymise it. In some circumstances we may anonymise your Personal Information (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.

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

In some circumstances you can ask us to delete your data: see Your rights with respect to your Personal Information.

Clients

We only keep Personal Information connected to Our Services for as long as is necessary to:

- carry out Our Services for you;
- respond to any questions, complaints or claims made by you or on your behalf;
- show that we treated you fairly;
- keep records required by law to comply with our legal obligations and our duties to our regulator. Anti-money laundering legislation requires us to retain records, documents and information relating to Our Services, including a copy of your identity documentation, for five years from conclusion of Our Services or when our business relationship with you ends.

For most types of Services, we retain your file, which will include your Personal Information, for up to fifteen years from the date of your final activity although this may vary depending on the nature of Our Services. Further information about the likely retention period will be provided to you when Our Services conclude.

Complaints or requests

If you are not a client of ours but you complain to us about how we have processed your Personal Information or you seek to exercise a data protection right such as a data subject access request, we will retain details of your complaint or request. We will only use the Personal Information we collect to process the complaint or request, to audit the level of service we have provided and to provide information to our insurers or regulator.

We will keep information in connection with the complaint or request in line with our retention policy. In most cases this means we will retain the information for six years.

How we protect your Personal Information

Keeping information secure is a key part of data protection compliance. We have put in place appropriate security measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know and they are subject to a duty of confidentiality.

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 or where we have otherwise agreed with you that we will.

We also maintain our own internal audit programme to verify that our staff are familiar with and adhere to our policies and procedures.

If we have given you a username and password which allows you to access certain parts of Our Services via our systems, you are responsible for keeping it confidential.

Your rights with respect to your Personal Information

You are entitled at any time to ask us for a copy of Personal Information we hold about you, known as a data subject access request. You are also entitled to ask that any information we hold about you is supplemented, updated or rectified. You can make any of these requests free of charge by contacting us - see Contact Information.

In certain circumstances you can also ask us to restrict our processing of your Personal Information, e.g. if you contest the accuracy of it. We will always review your request and will inform you if we decide we are not required to action it. If you require us to restrict or stop processing your Personal Information in any way, this may impact on our ability to provide our legal or professional services to you. Depending on the nature of your requests we may have to stop acting for you but you will still have to pay any unpaid fees and disbursements which we have incurred on your behalf until that date.

You are entitled to ask that we send a copy of the Personal Information we hold about you to another organisation for your own purposes, for example if you intend to instruct another service provider instead of us. If you want us to move, copy or transfer your Personal Information in these circumstances, please let your usual AAC contact know or contact us, see Contact Information.

We will aim to respond to your request within one month once we have assessed how feasible your request is, taking into account the technical capability of the other organisation involved.

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

We do not use your Personal Information for automated decision making.

How to complain

We hope that we can resolve any query or concern you may raise about our use of your information. If you want to complain about how we have handled your Personal Information, please follow the procedure in our Complaints Policy which is available on our website. We will investigate your complaint but if you are not satisfied with our response or believe we are processing your Personal Information unlawfully, you can complain to the UK Information Commissioner's Office. Further information is available on the ICO website or telephone 0303 123 1113.

The EU General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or EEA) State where you work, normally live or where any alleged infringement of data protection laws occurred. The UK supervisory authority is the Information Commissioner.

Contact Information

Please contact us or our Data Protection Officer by post, email or telephone if you have any questions about this Privacy Policy or the information we hold about you.

Telephone Number +44 (0) 208 731 8988

Email address compliance@achisomoch.org

Address 35 Templars Avenue, London, NW11 0NU

Do you need extra help?

If you would like this Policy in another format (for example large print) please contact us using the details above.