



## **Privacy Policy of Compass Insolvency Limited**

### **1. Purpose of this Notice**

This notice describes how we collect and use personal data about you in accordance with the General Data Protection Regulations (GDPR), the Data Protection Act 2018 and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK (Data Protection Legislation).

Please read the following carefully to understand our practices regarding your personal data.

### **2. About Us**

Compass Insolvency Limited ("CI Ltd", "we", "us", or "our") is committed to protecting your privacy. This privacy statement describes why and how we collect and use personal data and provides information about the rights of individuals. This privacy statement applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this privacy statement or as otherwise stated at the point of collection.

#### **Data Controller**

Our Data Controllers are Amanda Ireland, Alison Collier and Mark Willis of Compass Insolvency Limited, Prospect House, 11-13 Lonsdale Gardens, Tunbridge Wells, TN1 1NU.

### **3. What is personal data?**

The GDPR/Data Protection Act 2018 defines personal data as any information relating to an identified or identifiable living person.

We process personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ. When collecting and using personal data, our policy is to be transparent about how and why we process personal data.

### **4. How we collect your personal data**

We obtain personal data about you, for example when:

- you request a proposal from us in respect of the services we provide;
- you or your employer or our clients engage us to provide our services and also during the provision of those services;
- you contact us by email, telephone, post, fax or social media, when you have a query about our services;

- or from any third parties and/or publicly available resources (for example, from your employer, from HMRC, from Companies House);
- you are a creditor or debtor of an insolvent entity which we are appointed to deal with.

## 5. The type of information we hold about you

The information we hold about you may include the following:

- your personal details, such as your name and address;
- details of your liability to or from insolvent entities we are dealing with;
- details of contact we have had with you in relation to the provision, or the proposed provision of our services or are dealing with an insolvent employer;
- family/spousal information where necessary;
- information about management and personnel;
- payroll information where we act as a payroll bureau or are providing payroll advice and services or are dealing with an insolvent employer;
- accounts, income, taxation information and other relevant financial details such as pensions, savings and investments, etc.;
- details of any services you have received from us;
- our correspondence and communications with you;
- information about any complaints and enquiries you make to us;
- information from research, surveys and marketing activities;
- information we receive from other sources, such as publicly available information;
- information provided by your employer or our clients.
- ID information provided by Veriphy Limited as part of compliance with Money Laundering Regulations. We currently use the services of Veriphy Limited to assist us with performing identification checks on our clients for the purposes of compliance with the Money Laundering Regulations. Any personal information received from Veriphy Limited will be processed only to confirm your ID to us for the purposes of preventing money laundering or terrorist financing. You can access Veriphy Limited privacy policy at [www.veriphy.com/veriphy-privacy-policy/](http://www.veriphy.com/veriphy-privacy-policy/) where you will find information regarding Veriphy Limited's data processing activities.

## 6. How we use personal data

We may process your personal data for purposes necessary for the performance of our contract with you, or your employer, or former employer, or where you have had financial dealings with an insolvent entity over which we are appointed to act to comply with our legal obligations.

We may process your personal data for the purposes necessary for the performance of our functions as insolvency practitioners. This may include processing your personal data where you are a director, member, employee, subcontractor, supplier of an insolvent entity.

We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.

We may process your personal data for certain additional purposes with your consent and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

### **Situations in which we will use your personal data**

We may use your personal data in order to:

- carry out our obligations arising from any appointment of an insolvent entity;
- provide you with information related to our services and our events and activities that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes or it is within your legitimate or legal interest to receive it;
- to maintain and use our IT systems and accounting software platforms;
- to collect data to better understand an industry or sector;
- seek your thoughts and opinions on the services we provide;
- notify you about any changes to our services, and
- to comply with any legal requirement or to satisfy regulatory and Code of Conduct requirements of our professional bodies.

In some circumstances, we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

If you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered into with you. Alternatively, we may be unable to comply with our legal or regulatory obligations.

We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

### **Compass Insolvency Limited directors and staff**

We collect personal data about our partners and staff as part of our administration, management and employment duties. Further details about our privacy policy for directors and staff are located in our Employee Handbook.

### **Recruitment purposes**

We collect data about individuals applying for roles or details on individuals contacting us about possible vacancies or work experience opportunities at Compass Insolvency Limited.

During the recruitment process we will record only the information we require or are legally obligated to capture as part of the recruitment/interview process.

We will seek your consent to retain your details on file for future recruitment drives.

### **Data retention**

We will only retain your personal data for as long as is necessary to fulfil the purpose for which it is collected.

When assessing what retention period is appropriate for your personal data we take into consideration:

- the requirements of our business and the services provided;
- any statutory or legal obligations;
- the purposes for which we originally collected the personal data;
- the lawful grounds on which we based our processing;
- the types of personal data we have collected;
- the amount and categories of your personal data, and
- whether the purpose of the processing could reasonably be fulfilled by other means.

### **Change of purpose**

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis, which allows us to do so before starting any new processing.

Where we have been released from a formal insolvency procedure, and in the absence of specific legal, regulatory or contractual requirements, we will retain records for up to 12 years after our release. We review our data retention policies on an annual basis.

## **7. Data Sharing**

### **Why might we share your personal data with third parties?**

We will share your personal data with third parties where we are required by law, where it is necessary to administer the insolvent estate or where we have another legitimate interest in doing so.

### **Which third-party service providers process your personal data?**

“Third parties” includes third-party service providers.

The following activities are carried out by third-party services providers:

- IT and cloud services;
- professional advisory services;
- administration services;
- marketing services, and
- banking services.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our

third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

### **What about other third parties?**

We may share your personal data with other third parties, for example the Secretary of State, Creditors, The Court, The Insolvency Service. We may also need to share your personal data with a regulator or to otherwise comply with the law.

## **8. Transferring Personal Data outside the European Economic Area (EEA)**

For the majority of our insolvency cases we do not transfer data outside the EEA. However, should the circumstances of a case require this we always follow the Information Commissioner's guidance and those of the GDPR supervisory body in the relevant country.

## **9. Data Security**

We have put in place commercially reasonable and 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.

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

### **Visitors to our website**

We collect data from our site in the following ways:

<b>Type of data collected</b>	<b>How we use this data</b>
<b>Contact form/get in touch &amp; booking a free consultation</b>	You can contact us via telephone or email. Our contact details are easy to find on our Contact page. You can also contact us by completing the contact form contained in the contact page. We will use this information to contact you to answer your query or in order to book a free consultation for you, if you have requested a free consultation in the relevant opt-in box. We will not share this information with any third parties and use this for the purposes of answering your enquiry.
<b>Cookies</b>	A cookie is a small text file written to your hard drive that contains information about you. Cookies do not contain any personal information about users. Once you close your browser, the cookie simply terminates. We use cookies so that we can collect statistical information for analytical purposes. If you set up your browser to reject the cookie, you may still use the Compass Insolvency Limited website.

<b>Setting your browser not to accept cookies</b>	You can always set your browser to not accept cookies. Please note, however, that this may mean that some of our website features may not function as a result.
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## **How we use personal information gained via our website**

We use your information in the following ways:

- to provide you with updates on our products and services which you have either requested from us or which we feel would be of interest and benefit to you;
- to be able to track the services we provide you with or have subscribed to;
- to enable us to continually improve our services. This can include client satisfaction surveys;
- to notify you of any changes to our services;
- to notify you of any legislation changes including tax and legal updates;
- for recruitment and selection for interview purposes, where you have indicated an interest in working for Compass Insolvency Limited.
- to review and update the content of our website, including our blog and news area, so that we can keep our website content updated and relevant for our clients;
- to review the types of questions we receive in order to post relevant blog and social media updates;

## **Due diligence – website security**

We take all reasonable care to ensure our website is secure. However, as no data transmissions over the internet can ever be guaranteed as being 100% secure we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk

## **External website links**

To help you get a better user experience on our website we add in, where relevant and useful, links to external websites, for example R3 and the Insolvency Practitioners Association. Please note that we are not responsible for the security and information contained on other websites. If you click on these external links then you will need to review and abide by the terms & conditions and privacy policies of the website you are visiting, as our terms & conditions and privacy policy does not cover other websites.

## **Website hosting**

Our website is securely hosted in the UK.

## **10. Your rights under GDPR**

### **Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please notify us should your personal information change. Please contact us by emailing us at [insolvency@compassinsolvency.co.uk](mailto:insolvency@compassinsolvency.co.uk) or telephoning us on 01795 433655 to update your personal details.

## Your rights in connection with personal data

Under certain circumstances, by law, you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing. For further details visit details on the ICO website <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-erasure/>
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on content carried out by automated means and this is technically feasible.

If you want to exercise any of the above rights please email our data protection point. Please refer to the contact details at the foot of this notice.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of our other rights). This is another appropriate security measure to ensure that your personal information is never disclosed to any person who has no right to receive it.

### 11. Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from Compass Insolvency Limited), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent please email us the can be found at the foot of this notice.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## 12. Changes to this Notice

Our Privacy Policy is reviewed annually each year in April. Our next Privacy Policy update is April 2024. Our Privacy Policy is available to view at [www.compassinsolvency.co.uk](http://www.compassinsolvency.co.uk).

## 13. How you can contact us

If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please email our data protection point. Please refer to the contact at the foot of this notice.

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

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

Telephone: 0303 123 1113 (local rate) or 01625 545 745

Website: <https://ico.org.uk/concerns>

### **Compass Insolvency Limited contact information**

#### **Data Controllers**

Amanda Ireland, Alison Collier and Mark Willis  
Compass Insolvency Limited  
Prospect House  
11-13 Lonsdale Gardens  
Tunbridge Wells  
TN1 1NU

[Insolvency@compassinsolvency.co.uk](mailto:Insolvency@compassinsolvency.co.uk)

Tel 01795 433655 or 01892 530600