

Coralmead Solutions Ltd Privacy Notice

Updated May 2018

At Coralmead Solutions Ltd, we're committed to protecting and respecting your privacy. This Privacy Notice covers the collection, processing and other use of personal data under the Data Protection Act 1998 ("DPA") and the General Data Protection Regulations ("GDPR"). It applies to Coralmead Solutions Ltd website and any product, software, or service that links to it (collectively, our "Services"). It is important that the information provided in this policy is read together with our "Terms of Use". By accessing our Website and/or using our Services, you consent to the terms of this Policy and agree to be bound by it and our Terms of Use.

Contents

Who are Coralmead Solutions?	1
What personal data do we collect?	2
How do we use personal data?	3
How is personal data shared?	4
Where we store and transfer your data	5
Your rights	6
How long do we keep personal data?	7
Changes to this policy	8

1. Who are Coralmead Solutions?

Coralmead Solutions provides online accounts software from Quickbooks Online and related services such as data file set up, training, consultancy and support that helps small business owners process their own business bookkeeping, review their business financial position and run a variety of financial management reports. The Service involves the storage of data about a company or individual. That data can include "personal information". "Personal information" is information about an identifiable individual, and may include information such as the individual's name, email address, telephone number, business bank account details, taxation details and accounting and financial information.

The controller for the personal data when you use our services, communicate with us or use our website, is:



Coralmead Solutions Ltd, 1 & 2 Thorley Hall Stables, Church Lane, Bishops Stortford, Herts. CM23 4BE

Contact our Data Protection Officer or exercise your data protection rights (including your right to object) by emailing <u>enquiries@coralmeadsolutions.co.uk</u>

2) What personal data do we collect?

We collect personal data when you use our website, make an inquiry, communicate with us or use our services. We only collect the information that is required by us in the provision of our services.

- We will collect personal data on this website only if it is directly provided to us by you the user (e.g. your name, e-mail address, business name, address and telephone number) and therefore has been provided by you with your consent.
- We may use analytical and statistical tools that monitor details of your visits to our website and the resources that you access, including, but not limited to, traffic data, location data, weblogs and other communication data (but this data will not identify you personally).
- We collect information provided when you communicate with us by phone or email, including records of your email address or other contact information, and other information about the reasons for the communication.
- On registration for our services, we collect personal information directly from you, required to allow us to setup your data file with QuickBooks Online. This may include information about your company's employees, where a payroll data file set up is requested. It is used solely for the purpose of setting up the payroll data file and is not kept or stored anywhere outside of the Quickbooks Online cloud software.
- Through your use of our services, Coralmead Solutions may also collect information from you about third parties. It is your responsibility to let your customers, suppliers and employees aware that Coralmead Solutions has access to their personal data where appropriate.
- Any data you enter on your QuickBooks online data file can be accessed by Coralmead Solutions as the master admin.
- If you provide Coralmead Solutions with personal information about a third party, you must ensure that you have their permission/consent and are authorised to disclose that information to us. We may collect, use and disclose such information only for the purposes described in this policy. Where requested to do so by us, you must also assist us with any requests by the individual to access or update the personal information you have collected from them and entered into our services.



3. How do we use personal data?

We use personal data where it is necessary to provide the services you request.

- We may hold and process personal data that you provide to us in accordance with the DPA and GDPR.
- The information that we collect and store relating to you is primarily used to enable us to provide our services to you, and to meet our contractual commitments to you.
- We use personal data to communicate with you, such as alerting you to changes in the service, providing customer training and support, or to assist with the resolution of technical support issues or other issues relating to the Service. The ways we may contact you include; email, post, telephone, SMS text message or social media.

In addition, we may use the information:

- To notify you about any changes to our website, such as improvements, updates or service/product changes that may affect our service.
- To make sure the products and services we provide to you are correctly administered.
- To provide you with relevant information that may be of use to you or your business.
- To keep you updated about services that you have subscribed to.
- To verify your identity
- To assist fraud protection and minimise credit risk.

Coralmead Solutions will only use your personal information for the purposes described in this policy or with your express permission. When we do, we make sure we understand and work to minimise its privacy impact. For example, we limit the data to what is necessary and control access to the data.

4. How is personal data shared?

We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy.

- We may disclose your personal information:
 - a) To fulfil your requests for services.
 - b) To the extent that we are required to do so by law;
 - c) In connection with any ongoing or prospective legal proceedings;

d) In good faith 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) In connection with a merger, acquisition, or liquidation of the business.
- Except as provided in this policy, we will not provide your personal information to third parties.

5. Where we store and transfer your data

As part of the services offered to you, for example through our Website, the information you provide to us may be transferred to and stored in countries outside of the European Economic Area (EEA) as we use remote website server hosts to provide the website and some aspects of our service, which may be based outside of the EEA, or use servers based outside of the EEA – this is generally the nature of data stored in "the Cloud". It may also be processed by staff operating outside the EEA who work for one of our suppliers, e.g. our website server host, or work for us when temporarily outside of the EEA.

A transfer of your personal data may happen if any of our servers are located in a country outside of the EEA or one of our service providers is located in a country outside of the EEA. If we transfer or store your personal data outside the EEA in this way, we will take steps with the aim of ensuring that your privacy rights continue to be protected, as outlined in this privacy policy and in accordance with the DPA and GDPR. If you use our service while *you* are outside the EEA, your personal data may be transferred outside the EEA in order to provide you with these services.

All QuickBooks Online data is hosted in Intuit-managed data centres located in the US. QuickBooks Online uses 2-key 3DES for sensitive key storage and AES256 for encryption of data at rest. TLS is used to encrypt data in transit. Please refer to their own privacy policy at:

https://quickbooks.intuit.com/global/privacy/

6. Your Rights

You have certain rights under the law with regards to how your personal information is processed. These rights are:

- The right to be informed how your personal information is being used
 - This is detailed in section 3 'How do we use personal data?'
- The right of access to your personal information
 - If you wish to request a copy of our records on you please contact: enquiries@coralmeadsolutions.co.uk
- The right to rectification if your personal information is incorrect
 - If you want to change the information we hold on you please contact: <u>enquiries@coralmeadsolutions.co.uk</u>



- The right to erasure of your personal information
 - If you wish for us to delete your records please contact: enquiries@coralmeadsolutions.co.uk
 - If there is a legal basis for retaining your data we may be unable to process your request but we will comply wherever reasonable.
- The right to restrict processing of your personal information
 - If you wish to request this please contact <u>enquiries@coralmeadsolutions.co.uk</u>
- The right to data portability
 - The data we hold can be exported and transferred to yourself or a nominated third party by your request in a format suitable for most accounting software providers.
- The right to object to how your personal information is used
 - If you wish to object please contact <u>enquiries@coralmeadsolutions.co.uk</u>

The Internet is not in itself a secure environment and we cannot give an absolute assurance that your information will be secure at all times. Transmission of personal information over the internet is at your own risk and you should only enter, or instruct the entering of, personal information to our services within a secure environment. We will advise you at the first reasonable opportunity upon discovering or being advised of a security breach where your personal information is lost, stolen, accessed, used, disclosed, copied, modified, or disposed of by any unauthorised persons or in any unauthorised manner. We will inform both yourself and the ICO if we discover a data breach has occurred within 72 hours of the discovery.

7. How long do we keep personal data?

Coralmead Solutions Ltd keeps personal data for as long as necessary to provide our services. We also keep personal data for other legitimate business purposes, such as complying with our legal obligations, resolving disputes, preventing fraud, and enforcing our agreements. Because these needs can vary for different data types used for different purposes, retention times will also vary. We will keep any data required for the normal operation of our services for a maximum of nine years.

8. Changes to this Policy

Coralmead Solutions Ltd reserves the right to change this Privacy Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Web Site and you are deemed to have accepted the terms of the Policy on your first use of the Web Site following the alterations.