

# Numerus Accountancy

Chartered Accountants & Business Advisors

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## Privacy Policy

This Privacy Policy sets out how Numerus Accountancy Ltd, collects, uses, stores, and protects personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other applicable UK data protection laws. It applies to all personal data provided to us by individuals and businesses in connection with our accountancy and tax services.

Last updated: 28th February 2026

### 1. Who We Are

Numerus Accountancy Ltd acts as a data controller for the personal data we process. Our contact details are:

- Registered Address: 124 City Road, London, EC1V 2NX
- Email: [info@numerusaccountancy.com](mailto:info@numerusaccountancy.com)

### 2. What Personal Data We Collect

We collect and process various types of personal data depending on the services we provide, including:

- Names, addresses, contact details (email, phone)
- Date of birth, National Insurance number
- Bank account details
- Business and financial information (e.g. tax records, payroll data, accounting records)
- Identification documents
- Information received from HMRC or as a result of acting as your agent
- Records of meetings, phone calls, and correspondence
- Special category data (e.g. health information) where necessary and only with appropriate safeguards.

### 3. How We Collect Your Data

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We collect personal data through:

- Forms you complete
- Information you provide via phone, email, post, or in person
- Documents and records provided to us for contracted services
- Information from third parties (e.g. HMRC, Companies House) as required to fulfil our services.

## 4. Purposes and Legal Bases for Processing

We process your personal data for the following purposes and under these legal bases:

| Purpose                                       | Legal Basis                                    |
|-----------------------------------------------|------------------------------------------------|
| Providing accountancy and tax services        | Contractual necessity; Legal obligation        |
| Compliance with legal and regulatory duties   | Legal obligation                               |
| Managing our relationship with you            | Contractual necessity; Legitimate interests    |
| Communicating with you (including marketing)* | Consent (where required); Legitimate interests |
| Record keeping and billing                    | Contractual necessity; Legal obligation        |
| Improving our services                        | Legitimate interests                           |

\*You may withdraw your consent for marketing communications at any time.

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## 5. How We Use and Share Your Data

We use your data solely for the purposes outlined above. We may share your data with:

- HMRC, regulators, or law enforcement agencies as required by law
- Our professional advisers, auditors, and insurers
- Third-party technology and business service providers (for example, IT, cloud storage, and tax, accounting and payroll software providers)
- Other parties with your explicit consent or where necessary to fulfil our contract with you.

We do not sell your data to third parties.

## 6. Data Retention

We retain personal data only as long as necessary to fulfil our legal, regulatory, and contractual obligations. Typically, this is for a minimum of 7 years after the end of our business relationship or as required by law (e.g. HMRC requirements). After this period, data will be securely deleted or anonymised.

## 7. International Data Transfers

We do not normally transfer your personal data outside the EEA. Where this changes, we will ensure that any international transfer is made in accordance with UK data protection law and that appropriate safeguards are in place.

## 8. Your Rights

You have the following rights under data protection law:

- Access to your personal data
- Correction of inaccurate or incomplete data
- Erasure of your data ("right to be forgotten") in certain circumstances
- Restriction or objection to processing
- Data portability (where applicable)

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- Withdrawal of consent (where processing is based on consent)
- The right to lodge a complaint with the Information Commissioner's Office (ICO).

To exercise your rights, please contact us using the details above.

## 9. Data Security

We implement appropriate technical and organisational measures to protect your data against unauthorised access, loss, or misuse, including encryption, secure storage, access controls, and staff training.

## 10. Cookies and Website Usage

Our website uses cookies to improve user experience and analyse website traffic.

## 11. Requesting Personal Data We Hold About You (Subject Access Requests)

You have the right to request access to any personal data we hold about you. These requests are known as 'subject access requests' (SARs).

To make a SAR, please submit your request in writing and address it to Numerus Accountancy. To help us process your request efficiently, please provide sufficient details to verify your identity and locate the relevant information. This may include:

- Your full name and date of birth
- Any previous names you have used
- Your current and previous addresses (covering the past five years)
- Any reference numbers we may have provided to you (such as a client number, national insurance number, tax reference, or VAT registration number)
- A clear description of the information you are seeking

If you do not have a national insurance number or other reference, please include copies of:

- The photo page of your passport or your driving licence
- A recent utility bill showing your current address

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We are required by the Data Protection Act 2018 and UK GDPR to respond to SARs promptly and in any event within one month of receipt. In certain circumstances, such as complex or numerous requests, this period may be extended by up to two further months; we will notify you if this applies.

There are some situations where we may lawfully refuse to provide access to personal data, for example, if a similar request has been made previously and there has been little or no change to the data since our last response, or where disclosure would adversely affect the rights and freedoms of others.

We do not charge a fee for handling subject access requests.

If you wish, you may nominate someone else (such as a solicitor, friend, or relative) to make a SAR on your behalf. If you do so, we require your written authority to release information to them. This can be provided by signing a letter confirming your consent. Where we act as a data processor on your behalf (for example, for payroll services), we will assist you in responding to SARs in accordance with our contractual and legal obligations.

## 12. Changes to This Policy

We may update this policy from time to time. The latest version will always be available on our website.

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## 13. Contact Us

If you have any questions about this Privacy Policy or how we handle your data, please contact our Data Protection Officer at [info@numerusaccountancy.com](mailto:info@numerusaccountancy.com)

Numerus Accountancy Ltd is committed to protecting your privacy and handling your personal data transparently, fairly, and lawfully in accordance with professional and legal standards.

Philip Feng, Director

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