

# Privacy Notice

The following information is provided to comply with the requirements of the General Data Protection Regulation.

This privacy statement describes why and how we collect and use personal data and provides information about individuals' rights. It 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.

<b>Identity and contact details of the controller and where applicable, the controller's representative and the data protection officer</b>	<p>Where an insolvency practitioner of Kirks is not appointed as office holder, the data controller is the company/individual on whose instructions Kirks is acting. For contact details, please contact Kirks, 5 Barnfield Crescent, Exeter, EX1 1QT, tel. no: 01392 474303, email: mail@kirks.co.uk.</p> <p>Where an insolvency practitioner of Kirks is appointed as office holder and the data processing is carried out as part of their statutory duties, the office holder(s) is/are the data controllers. However, where they are processing data on behalf of the company/individual over which they have been appointed, then the data controller is that company/individual. In either case, the data controller(s) can be contacted at: Kirks, 5 Barnfield Crescent, Exeter, EX1 1QT, tel. no: 01392 474303, email: mail@kirks.co.uk.</p>
<b>How we use your personal information</b>	<p>The purpose for which personal information is processed may include any or all of the following:</p> <ul style="list-style-type: none"><li>• deliver services and meet legal responsibilities</li><li>• verify identity where this is required</li><li>• communication by post, email or telephone</li><li>• understand needs and how they may be met</li><li>• maintain records</li><li>• process financial transactions</li><li>• prevent and detect crime, fraud or corruption</li><li>• may also need to use data to defend or take legal actions related to the above</li></ul>
<b>Lawful basis for the processing</b>	<p>To comply with our legal obligations under statute and other regulatory obligations related to the insolvency process. We also believe you have a legitimate interest in the information being supplied.</p>

<b>What personal information we hold</b>	The categories are: contact details, financial information and location.
<b>Who we share our data with</b>	<p>Personal data held by us may be transferred to:</p> <p><b>Other offices</b> Details of our other office locations are available on our website, <a href="http://www.kirks.co.uk">www.kirks.co.uk</a>. We may share personal data with other offices where necessary for administrative purposes and to provide professional services to our clients.</p> <p><b>Third party organisations that provide applications/functionality, data processing or IT services to us</b> We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud based software as a service providers, identity management, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them.</p> <p><b>Third party organisations that otherwise assist us in providing goods, services or information</b></p> <p><b>Auditors and other professional advisers</b></p> <p><b>Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation</b> Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.</p>
<b>How long we retain your personal information</b>	We retain personal data for as long as is necessary to achieve the purpose listed above and for any other permissible related purpose. For example, we retain most records until the time limit for claims arising from the activities has expired or otherwise to comply with statutory or regulatory requirements regarding the retention of such records.
<b>Your rights</b>	<p>The GDPR provides the following rights for individuals:</p> <p><b>Right to inform</b> This privacy notice meets our requirement to inform you of our processing of your data.</p>

	<p><b>Access to personal data</b></p> <p>You have a right of access to personal data held by us as a data controller. This right may be exercised by contacting us at: Kirks, 5 Barnfield Crescent, Exeter, EX1 1QT, tel. no: 01392 474303, email: mail@kirks.co.uk. We will aim to respond to any requests for information promptly, and in any event within one month.</p> <p><b>Amendment of personal data</b></p> <p>To update personal data submitted to us, you may email us at mail@kirks.co.uk or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which you registered.</p> <p><b>Rights that do not apply in these particular circumstances</b></p> <p>Not all of the rights under the GDPR are available as one of the reasons we are holding your data is on the basis of it being a legal obligation and therefore the right to erasure, data portability and to object do not apply.</p>
<b>Right to withdraw consent</b>	The data received was not based upon obtaining consent and therefore the right to withdraw consent does not apply.
<b>Changes to our privacy statement</b>	We keep this privacy statement under regular review and will place any updates on our website. Paper copies of the privacy statement may also be obtained by writing to us at Kirks, 5 Barnfield Crescent, Exeter, EX1 1QT. This privacy statement was last updated on 13 June 2018.
<b>Complaints</b>	<p>Should you want to complain about our use of personal data, please contact us at: Kirks, 5 Barnfield Crescent, Exeter, EX1 1QT, tel. no: 01392 474303, email: mail@kirks.co.uk.</p> <p>You also have the right to lodge a complaint with the Information Commissioner's Office ("ICO") (the UK data protection regulator). For further information on your rights and how to complain to the ICO, please refer to the <a href="#">ICO website</a>.</p>
<b>Who provided the personal data</b>	The personal data we have used to contact you was provided by the company/individual (or persons acting on their behalf) on whose instructions we are acting or in relation to which our insolvency practitioner has been appointed. We also access information from the Registrar of Companies and other similar public-access data providers.