

CRS VAT Privacy & Cookie Policy

Introduction

Your privacy and trust are important to us and this Privacy Statement ("Statement") provides important information about how CRS VAT Consulting Limited handles personal information. This Statement applies to our website.

Please read this Statement carefully and contact our Data Protection Lead if you have any questions about our privacy practices or your personal information choices. It is important that you check back often for updates to this Statement. If we make changes we consider to be important, we will contact you using other methods such as email.

This Statement was last updated on 20th April 2018.

Personal information

CRS VAT Consulting Limited is committed to the responsible handling and protection of personal information.

Personal information means any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

We collect, use, disclose, transfer, and store personal information when needed to provide our Services and for our operational and business purposes as described in this Statement. We want to be clear about our privacy practices so that you can make informed choices about the use of your information, and we encourage you to [contact us](#) at any time with questions or concerns.

The types of personal information we collect

We collect personal information from you, for example, if you request information or use our Services. We may ask you to provide information such as your name, address, phone number and email address. Not all of the personal information CRS VAT Consulting Limited holds about you will always come directly from you. It may, for example, come from your employer, other organisations to which you belong, or a professional service provider such as your tax or accounting professional or lawyers, if they use our Services. We also collect personal information from third parties such as our clients, 3rd party service providers, and publicly available websites, to offer Services we think may be of interest and to help us maintain data accuracy and provide and enhance the Services.

In addition, our servers, logs, and other technologies automatically collect certain information to help us administer, protect, improve our Services and improve users' experience. We share personal information with others only as described in this Statement, or when we believe that the law permits or requires it.

Occasionally we collect and process what may be considered sensitive personal information.

Sensitive personal information is a subset of personal information and is generally defined as any information related to racial/ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, and other medical information including biometric and genetic data, or sexual life or preferences. In some instances, sensitive personal information may also include criminal allegations or convictions, precise geolocation information, financial and bank account numbers, or unique identifiers such as government-issued national insurance numbers, driver's license, and passport numbers.

How we use personal information

We process personal information for these Services and business related purposes

- Account setup and administration: We use personal information such as your name, email address, phone number and location to verify your identity, send Service information and newsletters.
- Marketing and events: We use personal information to deliver marketing and event communications to you across various platforms, such as email, telephone, text messaging, direct mail, and online. If we send you a marketing email, it will include instructions on how to opt in, to continue receiving these emails in the future.
- Hosted services: Any information stored by or on behalf of our customers is controlled and managed by and only made accessible by CRS VAT Consulting Limited personnel with a critical business reason.
- Legal obligations: We may be required to use and retain personal information for legal and compliance reasons, such as the prevention, detection, or investigation of a crime; loss prevention; or fraud. We may also use personal information to meet our internal and external audit requirements, information security purposes, and as we otherwise believe to be necessary or appropriate: (a) under applicable law; (b) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence; (c) to enforce our terms and conditions; and (d) to protect our rights, privacy, safety, or property, or those of other persons.

When we share personal information

CRS VAT Consulting Limited shares or discloses personal information when necessary to provide Services or conduct our business operations as described below. When we share personal information, we do so in accordance with data privacy and security requirements. Below are the parties with whom we may share personal information and why.

- Within CRS VAT Consulting Limited personal information will be made available to personnel if necessary for the provision of Services. All of our employees and contractors are required to follow our data privacy and security policies when handling personal information.
- Our third-party service providers: We partner with and are supported by service providers in the United Kingdom. Personal information will be made available to these parties only when necessary to fulfill the services they provide to us, such as direct marketing services and cloud hosting services. Our third-party service providers are not permitted to share or use personal information we make available to them for any other purpose than to provide services to us.
- Third parties for legal reasons: We will share personal information when we believe it is required, such as:
 - To comply with legal obligations and respond to requests from government agencies, including law enforcement and other public authorities, which may include such authorities outside your country of residence.
 - In the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings)
 - To protect our rights, users, systems, and services.

Where we store and process personal information

CRS VAT Consulting Limited is a UK organisation, and we take steps to ensure that the information we collect is processed according to this Privacy Statement and the requirements of applicable law wherever the data is located.

CRS VAT Consulting Limited has networks, databases, servers and systems, located at our office in the UK. We collaborate with third parties such as cloud hosting services, suppliers, and technology support located in UK to serve the needs of our business, workforce, and customers. We take appropriate steps to ensure that personal information is processed, secured, and transferred according to applicable law. CRS VAT Consulting Limited does

not disclose or transfer your personal information outside of the EU, your rights and protections remain with your data.

How we secure personal information

CRS VAT Consulting Limited takes data security seriously, and we use appropriate technologies and procedures to protect personal information. Our information security policies and procedures are closely aligned with widely accepted international standards and are reviewed regularly and updated as necessary to meet our business needs, changes in technology and regulatory requirements.

For example:

Policies and procedures

- We have measures in place to protect against accidental loss and unauthorised access, use, destruction or disclosure of data.
- We have a Business Continuity and Disaster Recovery strategy that is designed to safeguard the continuity of our service to our clients and to protect our people and assets.
- We place appropriate restrictions on access to personal information.
- We implement appropriate measures and controls, including monitoring and physical measures, to store and transfer data securely.

Training for employees and contractors

- We conduct privacy, information security, and other applicable training on a regular basis for our employees and contractors who have access to personal information and other sensitive data.
- We take steps to ensure that our employees and contractors operate in accordance with our information security policies and procedures and any applicable contractual conditions.
- We require, through the use of contracts and security reviews, our third-party vendors and providers to protect any personal information with which they are entrusted in accordance with our security policies and procedures.

How long we keep personal information

CRS VAT Consulting Limited retains personal information for as long as we reasonably require it for legal or business purposes. In determining data retention periods, CRS VAT Consulting Limited takes into consideration

UK laws, contractual obligations, and the expectations and requirements of our customers. When we no longer need personal information, we securely delete or destroy it.

Your right to access and correct your personal information

We respect your right to access and control your information, and we will respond to requests for information and, where applicable, will correct, amend, or delete your personal information.

- **Access to personal information:** If you request access to your personal information, we will gladly comply, subject to any relevant legal requirements and exemptions, including identity verification procedures. Before providing data to you, we will ask for proof of identity and sufficient information about your interaction with us so that we can locate any relevant data. We may also charge you a fee for providing you with a copy of your data (except where this is not permissible under local law).
- **Correction and deletion:** You have the right to correct or amend your personal information if it is inaccurate or requires updating. You also have the right to request deletion of your personal information; however, this is not always possible due to legal requirements and other obligations and factors. Remember that you can update your account information by using the “Contact Us” form on our website.
- **Marketing preferences:** Where you have provided your consent to opt in to receiving our newsletter and other marketing material, to opt out of newsletter and other marketing material, you can use the “Contact Us” form on our website to submit your request.
- **Filing a complaint:** If you are not satisfied with how CRS VAT Consulting Limited manages your personal data, you have the right to make a complaint to the UK data protection authority.

Cookies and similar technologies

CRS VAT Consulting Limited and our third-party providers set and use cookies and similar technologies to store and manage user preferences, deliver targeted advertising, enable content, and gather analytic and usage data.

The use of cookies and other tracking technologies is standard across websites and apps through which information is collected about your online activities across applications, websites, or other services.

What is a cookie?

A cookie is a small text file that is placed on a computer or other device when you visit web pages, they are created by your browser and are used to identify the user or device and to collect information. Cookies are typically assigned to one of four categories, depending on their function and intended purpose: absolutely necessary cookies, performance cookies, functional cookies, and cookies for marketing purposes.

Types of cookies and why we use them

- Preference cookies: These cookies are essential to enable you to move around a website and use its features.
- Performance cookies: These cookies collect information about how you use our websites. Information collected includes, for example, the Internet browsers and operating systems used, the domain name of the website previously visited, the number of visits, average duration of visit, and pages viewed. These cookies do not collect information that personally identifies you and only collect aggregated and anonymous information. Performance cookies are used to improve the user-friendliness of a website and enhance your experience.
- Functionality cookies: These cookies allow the website to remember choices you make (such as your username or ID, language preference, or the area or region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts, and other customizable parts of web pages. They may also be used to provide services you have asked for, such as watching a video or commenting on a blog. The information these cookies collect may be anonymised, and they cannot track your browsing activity on other websites.

Managing cookies

You can manage website cookies in your browser settings, and you always have the choice to change these settings by accepting, rejecting, or deleting cookies. If you choose to change your settings, you may find that certain functions and features will not work as intended. All browser settings are slightly different, so to manage cookies, you should refer to the relevant settings within your browser.

We understand that you may want to know more about cookies. Here are some useful resources that provide detailed information about types of cookies, how they are used, and how you can manage your cookie preferences: www.aboutcookies.org or www.allaboutcookies.org. Please click below for detailed information on how to disable and delete cookies in some commonly used browsers:

- [Mozilla Firefox®](#)
- [Microsoft® Internet Explorer](#)
- [Google Chrome™](#)
- [Safari®](#)

Links and connections to third-party services

Our Services may contain links to and may be used by you in conjunction with third-party apps, services, tools, and websites that are not affiliated with, controlled, or managed by us. Examples include Facebook, LinkedIn, Twitter® and, third-party apps like voice software and readers. The privacy practices of these third parties will be governed by the parties' own Privacy Statements. We are not responsible for the security or privacy of any information collected by these third parties. You should review the privacy statements or policies applicable to these third-party services.

Children's privacy

CRS VAT Consulting Limited provides accounting and VAT solutions for organisations, and our Services are generally not aimed at children. If, however we collect and use information about children, we will comply with industry guidelines and applicable laws.

How to contact us

We understand that you may have questions or concerns about this Statement or our privacy practices or may wish to file a complaint. Please feel free to contact us.

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