



# ATTFIELD JAMES

Banking Advisers

## *General Data Protection Regulation (GDPR) Privacy Policy*

13/2/18

Attfield James Ltd is committed to protecting and respecting the privacy of our contacts and clients. This policy sets out the basis on which any personal data that we collect or is provided is kept secure and let our clients know what we do with the information. The term 'personal data' as used in this policy refers to information such as names, email address, mailing address, telephone number, or any other data that can be used to identify you as an individual or company.

We take the security and confidentiality of your personal data very seriously. All processors of the data and any third parties we engage to process your personal information are obligated to respect the confidentiality of your information (you will be informed of this beforehand). We keep your personal data for only as long as reasonably necessary for the purposes for which it was collected or to comply with an applicable legal reporting or document retention requirements.

Attfield James Ltd will keep all information sent to us by a client/contact for a maximum period of 10 years. This will include eg copies of bank statements, accounts, or non-core cost invoices etc. This information will be used as a reference point for banking or non-core cost reviews during an Annual Health Check.

If during the 10 year period a Health Check occurs and subsequent, more up to date, information is received we may request the client gives us approval to hold the previous information for a longer period of 10 years, again for reference, if this is deemed necessary.

Any information that we receive eg phone number, job title reference, email address will be held on our Access Database for reference or mailing, however when we receive changes or updates we will update the database and spreadsheets (if applicable). We will not pass your details to a third party without your prior consent.

All filing will be labelled with the date of the oldest information/correspondence/file notes in order to be able to easily destroy out dated information in the future.

If we are asked by a client/contact to delete any information held on them then we will comply in an orderly and timely manner and all files and documents will be deleted. If we are asked not to contact a company we will keep a record of that request in order to comply. However we will keep a record of monies owed to us and bad debtors both past and present in order to take action accordingly.

Our data storage company will be GDPR compliant by May 25<sup>th</sup> 2018. They are certified as being compliant with the most widely accepted security and privacy standards and regulations in the world, such as ISO 27001/2, ISO27018/17 and SOC2. They place the utmost importance on data protection and have a track record of staying ahead of the compliance curve. They were one of the first cloud service providers to achieve ISO 27018 (the internationally recognised standard for leading practices in cloud privacy and data protection). They have carefully analysed the GDPR and are undertaking the necessary steps to ensure that they comply with the requirements by 25<sup>th</sup> May 2018. We also ensure that our computers have the latest firewall and have anti-virus and anti-malware protection; this is monitored daily by our IT specialists.

In the unlikely event that a breach should occur to our systems we will notify you as soon as practicable and we will report this breach to Information Commissioners Office.

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