

## Privacy Notice

PayPartners Limited is a provider of payroll processes to businesses and direct payments/personal health budget service users (clients). PayPartners must process personal data so that it can provide these services and in doing so, we act as a data processor.

## Collection and use of personal data

The information given to us may include your name, address, private and corporate e-mail address and phone number.

PayPartners does not obtain and process any personal data that is not knowingly and voluntarily given to us.

The core service we offer to clients is the management, calculation and processing of payroll.

PayPartners will only collect your personal data and will process it solely for the purposes of providing payroll services.

### The legal bases we rely upon to offer these services to you are:

- **Legitimate interest** – we use this basis for payroll services for clients and their employees. As a payroll management service, we are required to process clients and their employee's payroll data.
- **Contractual obligation** – we use this basis for the exchange of personal data for client contacts and their employees as it is a fundamental and essential part of this process. As a client, and a data controller, you have agreed to PayPartners managing and calculating your employee's payroll.
- **Legal obligation** – when payroll services have ceased we will continue to process and store personal data, for HMRC and other relevant regulatory bodies to fulfil all of our legal obligations, and within our retention periods.

### We use information held about you in the following ways:

- To carry out our obligations arising from any contracts we intend to enter into or have entered into between you or client and us and to provide you with the information, products and services that you request from us or we think will be of interest to you because it is relevant to your payroll needs.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- To comply with a legal or regulatory obligation.
- To provide you with information about other services we offer that are similar to those that you have already been provided with or enquired about. You can withdraw consent for marketing communications at any time by emailing [opt-out@pay-partners.co.uk](mailto:opt-out@pay-partners.co.uk)

Your personal data is stored on hosted servers which are in the UK. Some third party portals are used by PayPartners clients, and from time to time your data may be required to be submitted to these systems. We work closely with third parties including payment and other services, analytics providers, search information providers, credit reference agencies, professional advisors and client managed

service providers. We may receive information about you from them or be required to provide information to them for the purposes of our payroll services and ancillary support services.

Prior to providing your personal data to a third party we will let you know and obtain consent before proceeding with these submissions.

We do not undertake automated decision making or profiling. A person will always be involved in the decision-making process.

We do not collect any sensitive personal data.

We also use your data to notify you about changes to our service, inform you of relevant legislation or to measure client satisfaction as part of our ISO continuous improvement program.

## Data retention

The Company will retain personal data only for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

By law, we have to keep basic information about our clients and their employees (including contact, identity, financial and transactional data) for six years after they cease being clients for tax purposes.

Where PayPartners has obtained your consent to process your personal data, we will do so in line with our retention policy. Upon expiry of that period PayPartners will seek further consent from you. Where consent is not granted the Company will cease to process your personal data.

## Data security

The Company take the security of personal data seriously. We employ security technology, including firewalls and encrypted communications to prevent unauthorised access to our company systems and databases. We have procedures in place and closely monitor the security of data held to protect against unauthorised disclosure, use, loss or damage. The Company hosts its own servers and storage devices but engages a small number of third party applications that utilise external cloud-based storage, and in all cases relevant data is stored on devices located in mainland UK. We only use third party service providers where we are satisfied that they provide adequate security for personal data.

## How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to client needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

## Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy notice. You should exercise caution and look at the privacy notice applicable to the website in question.

## Your rights

Please be aware you have the following data protections rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to PayPartners processing your personal data you have the right to withdraw that consent at any time, or to exercise any of the other rights listed, by contacting our **Data Protection Team**:

**Email-** [dpo@pay-partners.co.uk](mailto:dpo@pay-partners.co.uk)

**Post-** PayPartners Limited, Lancastrian Office, Talbot Road, Stretford, Manchester, M32 0FP.

We want to make sure your information is accurate and we will delete or amend any information that is found to be inaccurate.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information as necessary.

You may choose to restrict the collection or use of your personal information in the following ways:

- whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes
- if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at [opt-out@pay-partners.co.uk](mailto:opt-out@pay-partners.co.uk)

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

## Changes to our Privacy Notice

We keep our policies under regular review and updates to our privacy notice are automatically posted to this page. Please check back frequently to see any updates or changes to our privacy notice.

This policy was last updated 22<sup>nd</sup> May 2018.

## Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact our **Data Protection Team**:

**Email-** [dpo@pay-partners.co.uk](mailto:dpo@pay-partners.co.uk)

**Post-** PayPartners Limited, Lancastrian Office, Talbot Road, Stretford, Manchester, M32 0FP.

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.

