

## BROWNS TREE SOLUTIONS– PRIVACY POLICY

We at Browns Tree solutions understand that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits our site, [www.brownstreesolutions.co.uk](http://www.brownstreesolutions.co.uk) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. You will be deemed to have accepted our Privacy Policy when you first use our site. If you do not accept and agree with this Privacy Policy, you must stop using our site immediately.

### 1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

“**Cookie**” means a small text file placed on your computer or device by our site when you visit certain parts of our site and/or when you use certain features of our site. Details of the Cookies used by our site are set out in section 12, below; “**Personal data**” means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to us when you use our site. This definition shall, where applicable, incorporate the definitions provided in the General Data Protection Regulation 2016/679 (“GDPR”); and “**We/Us/Our**” means Browns Tree solutions, a company registered in England and Wales under company number, 12060974 and VAT number 327 8965 52 whose registered address is at Unit 3 Blundells Road Bradville Milton Keynes

### 2. Contacting Us

Our main point of contact for data protection related queries is Suzanne Brown and can be contacted by email at [suzanne@brownstreesolutions.co.uk](mailto:suzanne@brownstreesolutions.co.uk) by telephone 08008620863 or by post 17 Farholme, Middleton, Milton Keynes, MK109RS. If you have any questions about this Privacy Policy or our site, please contact us using this email address. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you (as under section 12).

### 3. What Does This Policy Cover?

2.1 This Privacy Policy applies to our use of personal data collected when you become a service user, when you enquire about our services or when you visit our website.

2.2 Our Site may contain links to other websites, including social media links. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### 4. Your Rights

4.1 As a data subject, you have the following rights under the GDPR, which this Policy and our use of personal data have been designed to uphold:

4.1.1 The right to be informed about our collection and use of your personal data;

4.1.2 The right of access to the personal data we hold about you (see section 12);

4.1.3 The right to rectification if any personal data we hold about you is inaccurate or incomplete (please contact us using the details above);

4.1.4 The right to be forgotten – i.e. the right to ask us to delete any personal data we hold about you (we only hold your personal data for a limited time, as explained in section 6 but if you would like us to delete it sooner, please contact us using the details above);

4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;

- 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
  - 4.1.7 The right to object to us using your personal data for particular purposes; and
  - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 13 and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office who can be contacted via its website [www.ico.org.uk](http://www.ico.org.uk), or telephone 0303 123 1113.

## 5. What Data Do We Collect?

- 5.1 Depending upon your use of our site, we may collect some or all of the following personal and non-personal data (please also see section 13 on our use of Cookies and similar technologies):
- 5.1.1 name;
  - 5.1.2 Telephone number
  - 5.1.3 Email address
- 5.2 If you use our site to provide us with the personal data of any other person, it is your responsibility to ensure you have gained consent from that person to transfer their personal data to us.

## 6. How Do We Use Your Data?

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times.
- 6.1.1 Your personal data will be deleted 5 years after the service has ended
  - 6.1.2 Where we have a legal obligation to keep it longer, we will delete it as soon as our legal obligation has expired.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, we may use your data for the following purposes:
- 6.2.1 Providing and managing your access to our site;
  - 6.2.2 Update to our services if you have opted in to receive emails from us.
- 6.3 Where our processing of your data is based on our legitimate interests, we will have ensured that such processing is necessary and will not do so where our interests are over-riden by yours.
- 6.4 Our legitimate interests include
- 6.4.1 Fraud prevention
  - 6.4.2 Ensuring network and information security
  - 6.4.3 Indicating possible criminal acts or threats to public security
  - 6.4.4 Processing employee/volunteer or service user data
  - 6.4.5 Administrative transfers within a group of Health care professionals
- 6.5 With your permission and/or where permitted by law, we may use your data for marketing purposes which may include contacting you by email with information, news and offers on our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 6.6 You have the right to opt-out or unsubscribe at any time.
- 6.7 Third parties whose content appears on our site may use third party Cookies, as detailed below in section 13. Please refer to section 13 for more information on controlling Cookies. Please note that we do not control the activities of such third parties, nor the data they collect and use, and we advise you to check the privacy policies of any such third parties.

## 7. How Do We Store Your Data?

- 7.1 Data security is very important to us and to protect your data, we have taken suitable measures to safeguard and secure data collected through our site.
  - 7.2 We store your data on Xero UK LTD and their privacy policy can be found <https://www.xero.com/uk/>
  - 7.3 We only keep your personal data for as long as we need to in order to use it as described above in clause 6, and/or for as long as we have your permission to keep it.
  - 7.4 We endeavour to keep all of your personal information in the European Economic Area (EEA). The EEA includes all EU Member States plus Norway, Iceland, and Liechtenstein.
8. Do We Share Your Data?
- 8.1 We may sometimes contract with other third parties to supply services to you on our behalf. These include Insurance groups and other commercial contracts only if authorised to do so. In some cases, these third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.
  - 8.2 We may compile statistics about the use of our site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
  - 8.3 We may sometimes use third party data processors that are located outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where we transfer any personal data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.
  - 8.4 In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal requirements, a court order, or a governmental authority.
9. What Happens If Our Business Changes Hands?
- 9.1 We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by us.
  - 9.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.
10. How Can You Control Your Data?
- 10.1 In addition to your rights under the GDPR, set out in section 3, when you submit personal data to us via email or via our site, you may be given options to restrict our use of your data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails, at the point of providing your details and by contacting us).
  - 10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.
11. Your Right to Withhold Information
- 11.1 You may access certain areas of our site without providing any data at all. However, to use all features and functions available on our site you may be required to submit or allow for the collection of certain data.

11.2 You may restrict our use of Cookies. You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

12. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Please contact us for more details using the contact details above.

13. Our Use of Cookies

13.1 Like many other websites, ours uses cookies. Cookies are small pieces of information sent by an organisation to your computer or device and stored on your computer or device to allow a website to recognise you when you visit. They help us collect statistical data about your browsing actions and patterns but should not contain personal data (other than the cookie itself, which is defined as personal data under GDPR).

13.2 All Cookies used by and on our site are used in accordance with current Cookie law.

13.3 Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of our site may not function fully or as intended.

13.4 We may place and access the following Cookies on your computer or device, to facilitate and improve your experience of our site and to provide and improve our services:

Cookie Name	Description & purpose

13.5 Certain features of our site depend on Cookies to function there are four types of cookies.

13.5.1 Strictly Necessary Cookies –These are essential to make a website work and provide features you’ve asked for. Generally, these are used to provide shopping baskets and similar. Without these cookies the website may not work as intended.

13.5.2 Performance Cookies – These collect anonymous information about users for the purposes of tracking the performance of a website. Common uses include well known analytics tools such as Google Analytics.

13.5.3 Targeting / Advertising Cookies – These are similar to performance cookies. However they are used to track users’ behaviour and that information is then used on a “per user” basis to advertise products / services on the basis of the behavioural information collected.

13.5.4 Functionality Cookies – These are used to remember automatically the choices that users have made in order to improve their experience on the website; for example selecting desired layout or language.

13.6 Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings, but please be aware that our site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

- 13.7 Our site uses Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how our site is used. This, in turn, enables us to improve our site and the services offered through it. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of our site, it does enable us to continually improve our site, making it a better and more useful experience for you. Google's privacy policy is available at: [www.google.com/policies/privacy](http://www.google.com/policies/privacy).
- 13.8 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access our site more quickly and efficiently.
- 13.9 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

#### 14. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our site following the alterations. We recommend that you check this page regularly to keep up-to-date.