Culverhouse & Co.
CHARTERED ACCOUNTANTS
CHARTERED FINANCIAL PLANNERS

7 High Street
Farnborough Village
Kent BR6 7BQ
T: 01689 86 22 11

John R Culverhouse FCA, FPFS, ASCI
David R Knight BA (Hons), FCA, FCCA

CLIENT PRIVACY POLICY

Purpose of this notice

This privacy notice explains how we collect and use personal data about you, in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act 2018 and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK ('Data Protection Legislation').

By providing your personal data, you agree to the transfer, storing, and processing of it. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

This privacy notice explains how we collect, use, share, store and protect your personal information – including where we use artificial intelligence (AI) or automated tools.

This privacy notice also explains how you can make a complaint with us about how we handle your personal information.

About us

Culverhouse & Co is the trading name of Culverhouse & Co Ltd (Chartered Accountants) and Culverhouse Financial Planning Ltd (Chartered Financial Planners) and our registered office is at 7 High Street, Farnborough Village, Kent, BR6 7BQ. Culverhouse & Co Ltd is registered in England and Wales No. 64236365 and is registered to carry out audit work in the UK by the Institute of Chartered Accountants in England and Wales. Culverhouse Financial Planning Ltd is registered in England and Wales No. 8470047 and is authorised and regulated by the Financial Conduct Authority for financial services – Registration No. 600931.

For the purpose of the Data Protection Legislation and this notice, we are the 'data controller'. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

We have appointed a Data Protection Officer, John Culverhouse, who is our Data Protection Point of Contact and is responsible for assisting with enquiries in relation to this privacy notice or our treatment of your personal data. Should you wish to contact our Data Protection Point of Contact you can do so by using the contact details noted under the section 'Contact Us' on Page 5 of this document.

How we may collect your personal data & the kind of information we hold about you

We collect information about you when you engage with us to provide our accountancy and/ or financial planning services. This information will relate to your, or your company's, personal and/or financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services.

We may also collect information when you contact us through our website, by email, telephone, or post when you have a query about our services, when you voluntarily complete client surveys and/ or provide feedback to us. We have a separate privacy policy for our website which can be found online at https://www.culverhouse-accountants.co.uk/privacy-policy.

The information we hold about you may include your personal details such as your name and/or address, details of contact we have had with you in relation to the provision, or the proposed provision of services, details of any services you have received from us, our correspondence and communications with you, information about any complaints and enquiries you make to us and information we receive from other sources, such as publicly available information.

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. We will provide a copy of this privacy notice for them on request or, where appropriate, ask you to pass the privacy information to them.

Why we need to collect & process your personal data

We may process your personal data for purposes necessary for the performance of our contract with you, your employer, or our clients and to comply with our legal and regulatory obligations. We may process your personal data for the purposes necessary for the performance of our contract with our clients. This may include processing your personal data where you are an employee, subcontractor, supplier, customer, or relation of our client. We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, statistical and management purposes. We may process your personal data for certain additional purposes with your explicit consent such as special category data, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Special category data, such as that relating to health matters, is often required to provide our services. When this is required, we'll obtain your explicit consent to collect and process this information.
Please note that we may process your personal data for more than one lawful basis depending on the specific purposes for which we are using your data.

How we use personal data we hold about you

Situations in which we will use your personal data

We use your personal information to help us deliver the services you've asked for.

This may include :

- Understanding your financial situation so we can give you the right advice.
- Electronically verifying your identity in order to comply with UK anti-money laundering and ani-terrorist funding regulations.
- Offer specific support and guidance.
- Carry out our obligations arising from any contracts entered into between you and us.
- Provide you with information related to our services, our events and activities that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes.
- Investigating and responding to complaints.

Culverhouse & Co. is the trading name of Culverhouse & Co. Ltd. and Culverhouse Financial Planning Ltd. Registered Offices: 7 High Street, Farnborough Village, Kent BR6 7BQ.
Culverhouse and Co Ltd. is registered in England and Wales No. 6426365. Registered to carry on audit work in the UK by the Institute of Chartered Accountants in England and Wales.
Culverhouse Financial Planning Ltd. is registered in England and Wales No. 8470047. Culverhouse Financial Planning Ltd is authorised and regulated by the Financial Conduct Authority for financial services. FCA Registration No. 600931.

In some circumstances we may use anonymised or pseudonymised personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

If you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered into with you. Alternatively, we may be unable to comply with our legal or regulatory obligations. We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

Data retention

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected, subject to our regulatory requirements. We will take all reasonable steps to keep your personal data up to date throughout our relationship.

In principle, if you have provided us with your personal data because you have made an enquiry about our company or the services it provides, your personal data shouldn't be held for longer than is required to service your enquiry. Usually, this period is no longer than 1 year from the point of initial enquiry.

If you have provided us with permission to use your data for marketing purposes, we usually hold this data for 2 years from that point of submission. At this point we will ask you to update your marketing preferences.

If you become a client, you will be asked for your communication preferences at this point. Your data will then be subject to our regulatory requirements.

We are subject to regulatory requirements to retain your data for specified minimum periods. These are, generally:

- Three years for insurance business
- Five years for investment business
- Seven years for accountancy services & tax returns
- Indefinitely for pension transfers and opt-out business.

Copies of documents and information obtained to verify your identity for the purposes of UK anti money laundering legislation will be retained for a minimum of five years after our relationship with you has ended

These are **minimum** periods, during which we have a legal obligation to retain your records. We reserve the right to retain data for longer that these requirements where we believe it is in our legitimate interests to do so.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- The requirements of our companies and the services provided;
- Any statutory or legal obligations;
- The purposes for which we originally collected the personal data;
- The lawful grounds on which we based our processing;
- The types of personal data we have collected;
- The amount and categories of your personal data; and
- Whether the purposes of the processing could reasonably be fulfilled by other means.

You have the right to request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

Changes of purpose

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose. Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

Data sharing

If you agree, we may contact you about other products or services that we think may be of interest to you.

If you agree, we'll share your personal information between our companies so that they may offer you their products and services.

We won't share your information for marketing purposes with companies outside of our own.

In order to deliver our services to you effectively we may send your details to third parties such as those that we engage for professional compliance or legal services as well as product and platform providers that we use to arrange financial products for you.

Where third parties are involved in processing your data we'll have a contract in place with them to ensure that the nature and purpose of the processing is permitted, that they are subject to a duty of confidence in processing your data and that they'll only act in accordance with our written instructions. All of our third-parties are required to take commercially reasonable and appropriate security measures to protect your personal data.

Where it's necessary for your personal data to be forwarded to a third party we'll use appropriate security measures to protect your personal data in transit. In addition, to comply with the UK's General Data Protection Regulation we will encrypt any personal identifiable data we send to you or to third parties and will provide means for you to send any personal identifiable data to us using electronic secure messaging.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime we may send your details to third party agencies for identity verification purposes. We may also need to share your personal data with a regulator or to otherwise comply with the law.

Marketing

We would like to send you information about our products and services which may be of interest to you. If you have agreed to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contact for marketing purposes, please contact us by email, post, or through our website.

Data security

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Using Cookies

We use cookies to:

- Understand how visitors use our website.
- Where consent is not required, you can still control or opt out of cookies through your browser settings at any time.

If you'd like to learn more about cookies, you can visit; http://www.allaboutcookies.org/. You can change your browser settings to block or delete cookies at any time. The website above explains how to do this. Please note that if you choose to block cookies, some parts of our website may not work as expected.

Using artificial intelligence (AI) / automated tools to process your personal information

We do not use systems that make decisions about you without human involvement. Any outputs from automated tools or AI are reviewed by a human adviser before being used or relied on.

When we do:

Purpose of AI use

AI tools may be used to:

- Draft or summarise internal documents (e.g., meeting notes)
- Identify patterns or errors in data
- Enhance compliance monitoring
- Support risk assessments or vulnerability detection (non-decision-making)

Rights of access, correction, erasure and restriction

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details shown at the end of this document.

Your rights in connection with personal data

You have several rights under data protection law. This helps you understand and control how your personal information is used.

- **Right to be informed** - You can ask us to explain how we collect, use, share, and store your personal information.

- **Right of access** - You can request a copy of the personal information we hold about you, along with details of how we use it.

- **Right to rectification** - If you think any of your information is wrong or incomplete, you can ask us to correct or update it.

- **Right to erasure** – This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing.

- **Right to restrict processing** - You can ask us to limit how we use your information in certain circumstances.

- **Right to object** - You can object to us using your personal information, for example for direct marketing.

- **Right to data portability -** You can ask us to send your personal information to you, or directly to another organisation, in a structured, commonly used electronic format.

- **Rights related to automated decision-making and profiling -** If a significant decision about you is ever made without meaningful human involvement, you have the right to request human review, ask for an explanation and challenge the decision.

If you want to exercise any of these rights, please contact our Data Protection Point of Contact on the details provided at the end of this document.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please use any of the contact details provided below.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Changes to this notice

Any significant changes we may make to our privacy notice in the future will be provided to you through an appropriate method of communication.

This privacy policy was last updated on 31st July 2026.

Contact us

If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please contact our Data Protection Point of Contact, John Culverhouse, using the following contact details:

- Email: info@culverhouse-accountants.co.uk
- Telephone: 01689 86 22 11
- Postal Address: 7 High Street, Farnborough Village, Kent, BR6 7BQ.
- Website: www.culverhouse-accountants.co.uk

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone – 0303 123 1113
Website: https://www.ico.org.uk/make-a-complaint