Data protection policy

Swift Accountancy Limited | Updated October 2026

Swift Accountancy Limited is committed to handling personal information responsibly and protecting the privacy of the people whose information we use. This policy explains the principles and standards that govern our approach to data protection.

It applies to personal information handled through our professional services, business administration and website, whether held electronically or on paper. It covers information about customers, prospective customers, directors, employees, business contacts and other people whose details are relevant to our work.

Please read this policy alongside our **privacy notice**, which explains the information we collect, how and why we use it, who receives it, how long it is retained and your rights. Our website terms separately govern use of the website.

1 About Swift and responsibility for data protection

Swift Accountancy Limited is registered in England and Wales under company number **12734066**. Our address is **Swift Accountancy, 6 Hembrow, Evegate, Ashford, TN25 6SX**. Our ICO registration number is **ZA792741**.

Adam Clegg, Director, is responsible for overseeing data protection at Swift. You can contact him about this policy, your information or a data protection concern at **hello@swiftaccountancy.co.uk** or by writing to the address above.

Swift acts as a data controller where it determines why and how personal information is used. For some activities we may act as a data processor on a customer's documented instructions. Our responsibilities depend on the particular activity and are reflected in the relevant engagement arrangements.

2 Our data protection principles

Our policy is to:

- Use personal information lawfully, fairly and openly, and explain our purposes in clear privacy information.
- Collect information for specified and legitimate purposes, and assess any proposed new use before proceeding.
- Limit the information we collect and use to what is relevant and necessary for those purposes.
- Take reasonable steps to keep information accurate and correct it when necessary.
- Keep identifiable information only for as long as there is a justified need, taking account of applicable obligations.
- Apply security proportionate to the risks, and keep appropriate records demonstrating how we meet our responsibilities.

3 The legal framework

We handle personal information under applicable UK data protection and privacy legislation, including the UK GDPR, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003, as amended, including relevant changes made by the Data (Use and Access) Act 2025.

Professional confidentiality obligations also apply to our work. This policy does not override legal duties to retain information, make statutory disclosures or comply with restrictions on disclosure.

4 Lawful use and information requiring extra protection

Every use of personal information must have a lawful basis. Depending on the purpose, this may be performance of a contract with the individual, compliance with a legal obligation, legitimate interests or consent. The basis for using information must be appropriate to the person and activity concerned; a contract with a company does not automatically provide a contractual basis for every individual connected with it.

Where we rely on legitimate interests, our policy is to consider whether the use is necessary and balance those interests against the individual's rights and reasonable expectations. Where consent is required, it must be an informed and freely given choice that can be withdrawn.

Some information needs additional protection, including health and other special category information, and criminal offence information. Such information may be relevant to payroll, statutory pay, tax reliefs or compliance checks. Its use must satisfy the additional legal conditions that apply, with access and disclosure limited to what is necessary.

5 Openness accuracy and individual choice

Our privacy information explains how we use personal information and how people can contact us. Where information comes from another source, we consider the applicable requirements for informing the individual and any lawful exceptions.

We seek information relevant to the services and obligations concerned. Please tell us if information you have supplied changes or if you believe a record is inaccurate. We consider correction requests promptly and preserve appropriate records of significant changes where necessary.

Marketing must comply with both data protection law and the relevant electronic communications rules. We use consent where required and only rely on an existing-customer exception where its conditions are met. Automatically adding a customer to a mailing list does not itself amount to consent.

You can object to direct marketing at any time. Use the unsubscribe option in a marketing email or contact hello@swiftaccountancy.co.uk. We may retain a limited record of your objection to ensure that it is respected. Necessary communications about an engagement may continue where appropriate.

6 Security confidentiality and service providers

Our policy requires technical and organisational protection appropriate to the information and risks involved. This includes limiting access to authorised people who need the information for their work, confidentiality obligations, appropriate working practices and consideration of the security of the systems and providers used.

These standards apply to information handled at our office, remotely and through service providers. Security arrangements should be reviewed when systems, services or risks change. No electronic transmission or storage method can be guaranteed completely secure.

We use professional software and supporting services to deliver and administer our work. These include Engager, TaxCalc, Inform Direct, BrightPay and accounting software appropriate to the customer. Information is shared only for a lawful purpose and to the extent needed. Our privacy notice describes the relevant categories of recipients.

Where a provider processes information on our behalf, our policy is to assess its suitability and require appropriate contractual protection, including confidentiality, security and processing on documented instructions. Other organisations, such as HMRC, may receive information as independent controllers.

Where overseas processing amounts to a restricted international transfer, an appropriate legal transfer mechanism and any required additional safeguards must be in place. You can contact us for information about relevant arrangements and how to obtain a copy of applicable safeguards.

7 Retention and disposal

Our general retention period for accounting and tax engagement records is **seven years**. This normally runs from the end of the relevant accounting period or tax year, or from the end of the engagement for records relating to the overall professional relationship.

Different rules apply to some records. Information obtained specifically for anti-money laundering compliance is generally retained for five years after the business relationship ends or the relevant transaction completes, then deleted unless a lawful exception applies. Where we verify identity for Companies House as an ACSP, the required verification records must be kept for seven years from completion of the checks.

Some records may need longer retention for continuing tax matters, enquiries, disputes or legal claims. Enquiry, marketing, recruitment and employment records require periods appropriate to their purpose and applicable obligations. Seven years is therefore not a blanket rule for everything we hold.

Our policy is to review retention needs and securely dispose of information when it is no longer required, subject to legal preservation duties and practical arrangements for protected backups. Further details are available in our privacy notice or on request.

8 Your rights and requests

Depending on the circumstances, you may have rights to access, correct or erase information, restrict its use, receive qualifying information in a portable format, object to processing or withdraw consent. There are also safeguards for certain significant decisions made solely through automated processing. The applicable rights depend on the activity and lawful basis.

You can raise a request at hello@swiftaccountancy.co.uk or by writing to us. We may need proportionate information to verify your identity or clarify the request. We normally respond without undue delay and within one month, subject to lawful extensions or adjustments. Requests are normally free, although the law permits a reasonable fee or refusal in specified circumstances.

A right to erasure does not automatically override a legal obligation to retain information. Where Swift is acting as a processor, we will assist the relevant controller in responding as appropriate. Our privacy notice provides further information about your rights.

9 Personal data incidents

Our policy is to assess suspected personal data breaches promptly, take appropriate containment and corrective action and record the circumstances and decisions made. A breach can include loss, unauthorised access, accidental disclosure, alteration or destruction of information.

Where Swift is controller, a reportable breach must be notified to the ICO without undue delay and, where feasible, within 72 hours of awareness. Affected individuals must also be informed without undue delay where the breach is likely to create a high risk, unless a lawful exception applies. Where Swift is processor, we must notify the relevant controller without undue delay.

10 Complaints and policy review

If you are concerned about how we have handled information, please contact Adam Clegg at **hello@swiftaccountancy.co.uk**. We will acknowledge a data protection complaint within 30 days, investigate it, keep you appropriately informed and respond without undue delay.

You may also complain to the Information Commissioner's Office at **ico.org.uk/make-a-complaint**, by telephone on **0303 123 1113**, or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

We review this policy periodically and when material changes to our work or legal requirements make an update necessary. The current version will be made available on our website. Further information about the way Swift processes personal information is set out in our privacy notice.