Privacy notice

Swift Accountancy Limited | Updated October 2026

This notice explains how Swift Accountancy Limited collects, uses, shares and retains personal information when providing accountancy and related services and running our business. It covers customers, prospective customers, business contacts and people whose information is supplied to us in connection with our work, such as directors, employees, shareholders and subcontractors.

We handle personal information under the UK GDPR, the Data Protection Act 2018 and applicable privacy legislation, as amended. This notice should be read alongside your engagement terms and any additional privacy information we provide for a particular activity. Personal information means information relating to an identified or identifiable living person.

1 Who we are and how to contact us

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 VAT registration number is 413563220 and our Information Commissioner's Office registration number is ZA792741.

Swift is the data controller where we decide why and how personal information is used. For some services, including certain payroll activities, we may process information on a customer's instructions as a data processor. In those cases, the customer is responsible for its own privacy information and our respective responsibilities are addressed in our engagement arrangements.

Adam Clegg is our data protection contact. For questions, requests or complaints about personal information, email **hello@swiftaccountancy.co.uk** or write to the address above, marked for his attention.

2 How information reaches us

We collect information when you ask about our services, request a proposal, become a customer, provide records or contact us by telephone, email, post, our website or social media. We also receive information while carrying out an engagement.

Information may come from your employer, a business you are connected with, your advisers or previous accountant, HMRC, Companies House, public registers, identity verification providers and accounting or payroll systems to which we have authorised access. A customer may provide information about employees, customers, suppliers, family members or other people where relevant to our services.

3 Information we handle

The information needed depends on the services involved. It may include:

- Identity and contact information, including names, addresses, dates of birth, email addresses, telephone numbers and identity verification documents or results.
- Tax identifiers and financial records, including National Insurance numbers, UTRs, income, expenditure, assets, liabilities, bank details, transactions and tax correspondence.
- Business and ownership information, including directorships, shareholdings, beneficial ownership and details of business relationships.
- Employment, payroll and pension information, including pay, deductions, benefits, pension contributions, statutory pay and relevant absence records.
- Engagement records, advice, correspondence, invoices, payment history, complaints and communication preferences.

4 Sensitive information

Some work may involve information requiring additional protection, such as health information relevant to statutory pay or a tax relief, trade union deductions, or criminal offence information arising in compliance checks. We limit its use to what is necessary for the relevant purpose.

Alongside an ordinary lawful basis, we must have a condition permitting the use of special category information. Depending on the circumstances, this may concern employment and social protection obligations, legal claims, a legally recognised substantial public interest condition, or explicit consent. Criminal offence information is handled only where the law permits. Where we act as a processor, we handle this information under the customer's documented instructions and applicable legal requirements.

5 Why we use information and our lawful bases

Providing services and arranging an engagement. We use information to understand your requirements, prepare proposals, deliver accounts, tax, bookkeeping, payroll, company administration and advisory work, communicate with you and administer fees. We rely on contract where the individual is party to that contract. For information about company representatives or other people connected with a customer, we generally rely on legitimate interests in providing and administering the agreed professional services, subject to their rights.

Meeting legal and regulatory obligations. We use information for tax and statutory reporting, customer due diligence, anti-money laundering checks, identity verification where required, record keeping and responding to authorised bodies. The lawful basis is compliance with applicable legal obligations.

Managing and protecting our business. We may use information to maintain records, manage resources, resolve queries and complaints, recover debts, prevent fraud, maintain security and establish or defend legal claims. We rely on legitimate interests in operating a professional practice and protecting our business and customers, unless those interests are outweighed by the individual's rights and interests. Legal obligations may also apply.

Marketing and business development. We use contact details and communication preferences to send relevant updates and information about our services. We rely on consent where required, or legitimate interests where permitted, and comply separately with the electronic marketing rules explained below.

Where consent is the basis for a particular use, you can withdraw it at any time by contacting us. Withdrawal does not affect the lawfulness of earlier processing. Other information may still need to be used under a different lawful basis, such as a legal obligation.

If information needed to perform an engagement or complete mandatory checks is not provided, we may be unable to begin or continue the relevant work. We will explain what is needed and the consequences where appropriate.

6 Newsletters and marketing preferences

People can opt in to receive our newsletters and marketing. We may also send information about our similar services to existing customers where the law permits and the requirements for the existing-customer exception are met, including an opportunity to opt out when contact details are collected and in each marketing message. Different rules apply to corporate subscribers, but we respect marketing objections in all cases.

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 suppression record to ensure your preference is respected. Essential communications about your engagement, deadlines or our services may continue where necessary.

7 Organisations we share information with

We disclose information where necessary for our services, a legal obligation or another lawful purpose. Depending on the engagement, recipients may include:

- HMRC, Companies House, pension providers, regulators, law enforcement agencies and other bodies entitled to receive the information.
- Providers of practice management, accounts and tax, company administration, payroll and customer accounting systems. These include Engager, TaxCalc, Inform Direct and BrightPay, together with accounting software appropriate to the customer.
- Providers supporting our operations, such as IT, email and document storage, identity verification, secure communications, payment administration and professional support services.
- Your authorised representatives, other professional advisers, and a successor accountant where an appropriate handover is requested or otherwise lawfully arranged.
- Our professional advisers, insurers or relevant parties where needed for a complaint, legal claim, regulatory review or business transaction.

We share only information relevant to the purpose. Where a supplier acts as our processor, we require appropriate contractual protection, confidentiality and security, and processing on our documented instructions. Some recipients, including statutory bodies and other professional advisers, act as independent controllers and have their own responsibilities.

A proposed sale, transfer or restructuring of our practice may require controlled disclosure to professional advisers and prospective or actual successors. Any disclosure must be lawful, proportionate and subject to appropriate confidentiality and safeguards.

8 Processing outside the United Kingdom

The use of cloud services and their support arrangements may involve processing outside the UK. Where this amounts to a restricted international transfer, we must ensure an appropriate transfer mechanism is in place, such as UK adequacy regulations or approved contractual safeguards, together with any assessment or additional measures required by law.

You can contact us for information about relevant overseas processing and the safeguards used, including how to obtain a copy of applicable safeguards, subject to necessary redactions for confidentiality and security.

9 How long we retain information

Our general retention period for accounting and tax engagement records is seven years. The starting point depends on the record: normally the end of the relevant accounting period or tax year for work relating to that period, or the end of the engagement for records concerning the overall professional relationship.

This is not a blanket period for every category of information. We consider legal and professional requirements, the purpose of the record and any continuing need, including open enquiries, disputes, legal claims or information relevant to later tax calculations. Some records may therefore need longer retention.

Records obtained specifically for anti-money laundering compliance are generally subject to a five-year retention period after the business relationship ends or the relevant transaction is completed, with deletion afterwards unless a lawful exception permits continued retention. Separate identity verification requirements may also apply.

Enquiries that do not lead to an engagement and marketing records are kept only for as long as justified by their purpose and any applicable obligations. We review information for deletion or secure disposal when it is no longer needed. You can request more information about the period applicable to a particular record.

10 Protecting information

We are responsible for applying technical and organisational measures appropriate to the information and the risks involved. These include controlling access and requiring confidentiality from people handling personal information. Access is limited to those who need it for their work, and suppliers are assessed in relation to the services they provide.

We investigate suspected personal data breaches and take appropriate action. Where the law requires, we report a breach to the ICO and notify affected individuals. No method of electronic communication or storage can be guaranteed completely secure.

11 Your rights and how to use them

Depending on the circumstances and lawful basis, you may have the following rights:

- **Access:** ask whether we use your personal information and obtain a copy, together with information about its use.
- **Correction:** ask us to correct inaccurate information or complete information that is incomplete.
- **Erasure:** ask us to delete information where there is no lawful reason to retain it. This does not override applicable legal retention requirements.
- **Restriction:** ask us to limit use of information in specified circumstances, for example while accuracy is checked.
- **Portability:** receive information you provided in a structured, commonly used, machine-readable format, and request its transfer where processing is automated and based on consent or a contract with you, subject to the applicable conditions.

You can object to processing based on legitimate interests for reasons relating to your circumstances. We must stop unless we demonstrate compelling legitimate grounds overriding your interests, rights and freedoms, or the processing is needed for legal claims. Your right to object to direct marketing is absolute.

To exercise a right or withdraw consent, email hello@swiftaccountancy.co.uk. We may need proportionate information to verify your identity or clarify the request. Please also tell us if information we hold has changed.

We normally respond to rights requests without undue delay and within one month, subject to any lawful extension or adjustment to the time limit. Requests are normally free. Where the law permits, including for manifestly unfounded or excessive requests, we may charge a reasonable fee or refuse the request and explain why.

12 Raising a concern or complaint

Please send data protection complaints to hello@swiftaccountancy.co.uk, marked for Adam Clegg, or write to our address on page 1. Explain your concern and the outcome you are seeking. We will acknowledge your complaint within 30 days, investigate it, keep you informed as appropriate and respond without undue delay.

You also have the right to complain to the Information Commissioner's Office. Visit **ico.org.uk/make-a-complaint**, telephone **0303 123 1113**, or write to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

13 Changes to this notice

We review this notice when our services, processing arrangements or legal requirements change. The current version will be made available on our website, and we will bring material changes to your attention where appropriate. If we propose a new use of information, we will assess whether it is compatible with the original purpose, establish a lawful basis and provide additional privacy information where required.