

Fair Processing Notice for Clients

At Initium DBC we respect your personal data. This Fair Processing Notice explains how we will use your personal data when you are a client of ours.

Our contact details

Our office is at Central Point, 45 Beech Street, London, EC2Y 8AD
0800 917 4444
enquiries@andoffices.com

Our Data Protection Officer is Kristy Gouldsmith and she can be contacted at DPO@beoffices.com

What personal data do we collect about you; how do we use that personal data; and what is our legal basis?

When you are a client, we collect and process your personal data in order to fulfil our contract for services with you, to fulfil our legal obligations and with your consent.

We need a legal basis in order to process your personal data. Most of our processing is because we either have a contract for services with you or we have a legal obligation to process the data. On occasion, we will seek your consent to process your personal data but you are free to refuse.

We collect your name, address, date of birth and phone. Our legal basis to do so is because we have a contract with you and need this information for that contract.

We need your bank account details for our contract with you.

In order to comply with our legal obligations to prevent money laundering, we process your:

- passport (name, DOB, facial biometrics, passport number, nationality, gender, place of birth, signature)
- Biometric Residents Permit (name, date and place of birth/ biometrics - fingerprints and a photo of face/ immigration status / access to public funds)
- identity card issued by the Electoral Office for Northern Ireland (name, DOB, photo)
- valid photo card driving license (name, DOB, signature)
- HM Forces Identify Card (name, photo, number)
- firearms certificate or shotgun license (name, address)
- recent evidence of entitlement to a state- or local authority-funded benefit, including housing benefit, council tax benefit, tax credits, state pension, educational or other grant (name, address, DOB, NI number)
- instrument of a court appointment, such as a liquidator or grant of probate (name, address)
- current council tax demand letter or statement (name, address)
- HMRC-issued tax notification (name, address, DOB, NI number)
- end of year tax deduction certificates (name, address, DOB, NI)

- current bank statements or credit/debit card statements (name, address)
- current utility bill (name, address)
- disabled drivers blue badge (name, address)
- current student card (name, photo)
- national identify card (name, photo)

We will send you marketing information and newsletters when you consent for us to do so. We will also send you this type of information because you are a client of ours. You have the right to unsubscribe to marketing at any time. If you do choose to unsubscribe, we will keep your name and email address on a suppression list so that we don't email you again by accident.

How long do we hold your personal data?

We will hold your personal data that was collected for anti-money laundering purposes for five years, after which it will be destroyed.

We will hold the personal data that was collected for the purposes of providing you with the service while you are a client and for seven years, after which it will be destroyed.

When we use your personal data for marketing, we will do so only while we have your consent. If you withdraw your consent, we will hold your name and email on a suppression list for five years.

Do we use any automated decision making?

We do not use any automated decision making.

Who do we share your personal data with?

We share your personal data with the following recipients:

- our software providers
- cloud service providers
- payment providers
- companies that check your anti-money laundering documents
- SOCA

Do we transfer your personal data outside of the EU or EEA?

We do not transfer your personal data outside of the EU.

Your rights

You have rights in respect of our processing of your personal data which are:

- To access to your personal data and information about our processing of it. You also have the right to request a copy of your personal data (but we will need to remove information about other people).
- To rectify incorrect personal data that we are processing.
- To request that we erase your personal data if:
 - we no longer need it;
 - if we are processing your personal data by consent and you withdraw that consent;
 - if we no longer have a legitimate ground to process your personal data; or
 - we are processing your personal data unlawfully
- To object to our processing if it is by legitimate interest.
- To restrict our processing if it was by legitimate interest.
- To request that your personal data be transferred from us to another company if we were processing your data under a contract or with your consent and the processing is carried out automated means.

If you want to exercise any of these rights, please contact us.

If you have any questions or concerns, please email DPO@beoffices.com as most matters can be resolved informally in the first instance.

You also have the right to lodge a complaint about our processing the UK's [Information Commissioner's Office](#).